

Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

DEC 28 2017

Ms. Nicole Opela  
EH&S Coordinator  
Pittsburgh Corning Corporation  
2700 West 16th St  
Sedalia, MO 65301

RE: New Source Review Permit Amendment - Permit Number: 082014-015A  
Confidential Project: 2016-05-027; Public Project: 2016-04-052; Installation: 159-0009

Dear Ms. Opela:

This amendment is in response to the application received April 26, 2016, complete August 12, 2016. Pittsburgh Corning requested confidentiality for the Tank 7 process, and it was granted. This is the redacted public amendment. A confidential version is available under project 2016-05-027. Table 1 summarizes updated emission units. There is no MHDR increase or PTE increase associated with this amendment. The amendment addresses the following items,

- Rail receiving (S-01) and truck receiving (S-01A) capture and control efficiencies. Permit 082014-015 did not require capture and control devices, however the devices exist.
- Addition of existing silo vents (S-03A, S-03B, S-03C) as emission units.
- Conveying (S-02A) capture efficiency within the mix building. Permit 082014-015 required 100% capture efficiency, but that is not occurring. Notice of Violation KC2016011507471907.
- On August 18, 2017, Pittsburgh Corning communicated that in the future it will remove or render inoperable the Tank 7 melting furnace and associated processes. Initially, Pittsburgh Corning plans to remove the [REDACTED]. Tank 7 cannot physically operate with this tank removed. A special condition has been added requiring equipment to be removed or rendered inoperable.
- Relocation of off-line salvage saw (S-44).
- Changes to finishing saws and grinders (S-13) exhaust duct.
- Updated emission factors for the installation-wide NO<sub>x</sub> and SO<sub>2</sub> emission limits.
- Replacement of pre-anneal grinding (S-41) baghouse #35 with baghouse #71 to be obtained from Tank 7. Replacement is proposed for improved employee working conditions.
- Tank 4 furnace emission testing.



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Table 1: Updated Emission Units

Emission Unit	Description	True MHDR	Bottlenecked MHDR	Control Device
S-01	Rail receiving (Only █, █, █. Other additives are supersacks.)	█ tph	█ tph is the sum of Tank 4 █, █, and █ MHDR.  █ tph is the sum of all Tank 4 raw materials MHDR.	Choke flow from railcar to pit and baghouse intake inside pit 80% capture, routed to baghouse DC#5 (C-1)
S-01A	Truck receiving (Only █, █, █. Other additives are supersacks.)	Project 2008-02-048 calculation s state █ tph.	█ and █ tph (see above)	Partial enclosure 25% capture, routed to baghouse DC#5 (C-1)
S-03A, S-03B, S-03C	Silo filling air displacement (█, █, █)	N/D	█ and █ tph (see above)	Partial enclosure routed to baghouse DC#5 (C-1)
S-02A	Conveying within mix building (all raw materials)	N/D	█ tph	Partial enclosure 90% capture, routed to baghouse DC#5 (C-1)
S-02	Batch mixer	█ tph	█ tph	Partial enclosure 90% capture, routed to baghouse DC#6 (C-3).
S-44	Salvage saw previously part of S-13. Salvage saw relocated on-site with new dust collector	N/D	N/D	Partial enclosure 90% capture, routed to dust collector DC#44 (C-44)
S-13	Finishing saws and grinders. Make changes to duct work allowing emissions to be routed to either baghouse DC#1 or DC#13	N/D	N/D	Partial enclosure 90% capture, routed to baghouse DC#1 or baghouse DC#13
S-41	Replace existing pre-anneal grinding baghouse DC#35	N/D	N/D	Baghouse DC#71

N/D = not determined

Table 2: Potential Emission Summary (tpy)

Pollutant	De minimis Level / SMAL	Limited Installation wide PTE
PM	25.0	N/D
PM <sub>10</sub>	15.0	N/D
PM <sub>2.5</sub>	10.0	N/D
SO <sub>2</sub>	40.0	< 250.0
NO <sub>x</sub>	40.0	< 250.0
VOC	40.0	N/D
CO	100.0	N/D
Sulfuric Acid Mist	7.0	N/D
GHG (mass)	0	N/D
GHG (CO <sub>2</sub> e)	75,000	N/D
Combined HAPs	25.0	N/D
Manganese	0.8	N/D

N/A = Not applicable. N/D = Not determined.

Truck receiving (S-01A) partial enclosure and air intake has been assigned 25% capture efficiency. The reduced monitoring requirements in Special Condition 5.C. reflect this low capture. Silo filling air displacement (S-03A, B, and C) occurs in an enclosed headhouse with air draw and has been assigned 90% capture efficiency. The headhouse is designated as respirator required for entry, giving justification to its degree of enclosure and reduced monitoring requirements in Special Condition 5.E. Actual headhouse capture may be higher than 90%.

Submittal of an application to amend the Part 70 operating permit is required within one year of this amendment's issuance.

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* applies to conveying (S-02A). The process weight rate is █ tph. The calculated emission limit is 15.1 lb/hr. The PM PTE is 5.33 lb/hr. The PTE is less than the rule limit, therefore the emission unit is in compliance. The rule also applies to silo air displacement (S-03A, B, and C), and the units are in compliance.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified

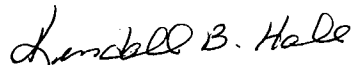
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mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions regarding this amendment, please do not hesitate to contact David Little, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:dlj

Enclosures

c: Kansas City Regional Office  
PAMS File: 2016-04-052

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Pittsburgh Corning Corporation  
Pettis County, S5, T45N, R21W

1. **Superseding Condition**  
The conditions of this permit supersede all special conditions in construction permit 082014-015 issued by the Air Pollution Control Program.
2. **Tank 7 Inoperable**  
Pittsburgh Corning Corporation shall within 30 days of this amendment's issuance either remove, dismantle, or render inoperable Tank 7. Pittsburgh Corning Corporation shall keep records on site of the activity performed and date.
3. **Installation-wide NO<sub>x</sub> Emission Limit**
  - A. Pittsburgh Corning Corporation shall emit less than 250.0 tons of NO<sub>x</sub> in any consecutive 12-month period from the following emission units, inclusive of startup, shutdown, and malfunction.
    - 1) Tank 4 glass pulled (S-06A)
    - 2) Forehearth/tube draw (S-07A)
    - 3) Cellulating natural gas combustion 3, 4, 5, 6, 7 (S-10)
    - 4) Annealing lehrs 3, 4, 5, 6, 7 (S-24)
    - 5) Cullet dryers natural gas combustion (S-34A, S-34B, S-34C)
    - 6) Space heaters natural gas combustion (S-25)
    - 7) Emergency diesel engine (S-28)
  - B. Pittsburgh Corning Corporation shall develop and use forms to demonstrate compliance with Special Condition 3.A. The forms shall contain at a minimum the following information,
    - 1) Installation name
    - 2) Installation ID
    - 3) Permit number
    - 4) Emission unit
    - 5) Current month
    - 6) Current 12-month date range
    - 7) Respective monthly throughput of the emission units (tons glass pulled, MMCF natural gas, gallons LP gas, gallons diesel)

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

- 8) Respective NO<sub>x</sub> emission factors  
 a) At the time of this amendment's issuance the NO<sub>x</sub> emission factors in Table 3 shall be used.

Table 3: NO<sub>x</sub> Emission Factors

Emission Unit	NO <sub>x</sub> Emission Factor	Units of Measure
Tank 4 glass pulled	■	lb / ton glass pulled
All natural gas combustion, for this permit exclusive of Tank 4 usage	100	lb / MMCF
All LP gas combustion, excluding fork lifts	0.019	lb / gal
Diesel combustion in emergency engine	0.604	lb / gal

- b) When Pittsburgh Corning Corporation tests NO<sub>x</sub> emissions in accordance with Special Condition 7, Pittsburgh Corning Corporation shall develop a new NO<sub>x</sub> emission factor as indicated in Table 6 to demonstrate compliance with Special Condition 3.A.
- 9) Monthly emissions for each emission unit calculated using the following equations:

$$NOx \text{ emissions (tons)} = \text{natural gas fired (MMCF)} \times 100 \left( \frac{\text{lb NO}_x}{\text{MMCF of fuel fired}} \right) \times \left( \frac{1 \text{ ton NO}_x}{2000 \text{ lbs NO}_x} \right)$$

Except do not include the Tank 4 natural gas usage as natural gas is already represented in the ■ lb/ton glass emission factor. When the lb/ton glass (exclusive of NO<sub>x</sub> portion from natural gas combustion) emission factor is developed from stack testing, then separately include the Tank 4 natural gas usage.

$$NOx \text{ emissions (tons)} = \text{Tank 4 glass pulled (tons)} \times \left( \frac{\text{lb NO}_x}{\text{ton glass pulled}} \right) \times \left( \frac{1 \text{ ton NO}_x}{2000 \text{ lbs NO}_x} \right)$$

$$NOx \text{ emissions (tons)} = \text{propane combusted (gal)} \times 0.019 \left( \frac{\text{lb NO}_x}{\text{gal propane}} \right) \times \left( \frac{1 \text{ ton NO}_x}{2000 \text{ lbs NO}_x} \right)$$

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The permittee is authorized to construct and operate subject to the following special conditions:

$$NO_x \text{ emissions (tons)} = \text{engine diesel usage (gal)} \times 0.604 \left( \frac{\text{lb } NO_x}{\text{gal diesel}} \right) \times \left( \frac{1 \text{ ton } NO_x}{2000 \text{ lbs } NO_x} \right)$$

- 10) Monthly NO<sub>x</sub> emissions calculated by summing NO<sub>x</sub> emissions from all emission units
- 11) 12-month rolling total NO<sub>x</sub> emissions and the sum of all NO<sub>x</sub> emissions from startup, shutdown, and malfunction as reported to the Air Pollution Control Program's Compliance/Enforcement Section
- 12) Indication of compliance with Special Condition 3.A.

**4. Installation-wide SO<sub>2</sub> Emission Limit**

A. Pittsburgh Corning Corporation shall emit less than 250.0 tons of SO<sub>2</sub> in any consecutive 12-month period from the following emission units, inclusive of startup, shutdown, and malfunction.

- 1) Tank 4 melting furnace (S-06A)
- 2) Tank 4 furnace natural gas combustion (S-06A)
- 3) Tank 4 ■ (S-06A)
- 4) Forehearth/tube draw (S-07A)
- 5) Cellulating aluminum sulfate (S-10)
- 6) Cellulating natural gas combustion 3, 4, 5, 6, 7 (S-10)
- 7) Annealing lehrs 3, 4, 5, 6, 7 (S-24)
- 8) Cullet dryers natural gas combustion (S-34A, S-34B, S-34C)
- 9) Space heaters natural gas combustion, other not listed elsewhere (S-25)
- 10) Emergency diesel engine (S-28)

B. Pittsburgh Corning Corporation shall develop and use forms to demonstrate compliance with Special Condition 4.A. The forms shall contain at a minimum the following information,

- 1) Installation name
- 2) Installation ID
- 3) Permit number
- 4) Emission unit
- 5) Current month
- 6) Current 12-month date range
- 7) Respective monthly throughput of the emission units (tons of glass produced, MMCF natural gas, tons ■, gallons LP gas, gallons diesel)

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

- 8) Respective SO<sub>2</sub> emission factors  
 a) At the time of this amendment's issuance the SO<sub>2</sub> emission factors in Table 4 shall be used.

**Table 4: SO<sub>2</sub> Emission Factors**

Emission Unit	SO <sub>2</sub> Emission Factor	Units of Measure
Tank 4 glass pulled	* ■	lb / ton glass
■ addition	■ x S	lb / ton ■
All natural gas combustion	0.6	lb / MMCF
All LP gas combustion, except fork lifts	0.0015	lb / gal
Diesel combustion in emergency engine	2.12E-04	lb / gal

\* ■ is from raw material mass balance exclusive of ■ addition and natural gas combustion

- b) When Pittsburgh Corning Corporation tests SO<sub>2</sub> emissions in accordance with Special Condition 7, Pittsburgh Corning Corporation shall develop a new SO<sub>2</sub> emission factor as indicated in Table 6 to demonstrate compliance with Special Condition 4.A.
- 9) Monthly emissions for each emission unit calculated using the following equations:

$$SO_2 \text{ emissions (tons)} = \text{natural gas fired (MMCF)} \times 0.6 \left( \frac{\text{lb SO}_2}{\text{MMCF of fuel fired}} \right) \times \left( \frac{1 \text{ ton SO}_2}{2000 \text{ lbs SO}_2} \right)$$

$$SO_2 \text{ emissions (tons)} = \text{Tank 4 glass pulled (ton)} \times \left( \frac{\text{lb SO}_2}{\text{ton glass pulled}} \right) \times \left( \frac{1 \text{ ton SO}_2}{2000 \text{ lbs SO}_2} \right)$$

$$SO_2 \text{ emissions (tons)} = \text{■ usage (tons)} \times \left( \frac{\text{lb SO}_2}{\text{ton ■ used}} \right) \times \left( \frac{1 \text{ ton SO}_2}{2000 \text{ lbs SO}_2} \right)$$

Where S equals the sulfur weight percent of the ■ with the % sign removed, e.g. if the sulfur weight percent is 1.2%, then S = 1.2.

However, when the lb/ton glass (exclusive of SO<sub>2</sub> portion from natural gas combustion) emission factor is developed from stack testing, then do not separately include the Tank 4 ■ addition.



**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

$$SO_2 \text{ emissions (tons)} = \text{propane combusted (gal)} \times 0.0015 \left( \frac{\text{lb } SO_2}{\text{gal propane}} \right) \times \left( \frac{1 \text{ ton } SO_2}{2000 \text{ lbs } SO_2} \right)$$

$$SO_2 \text{ emissions (tons)} = \text{engine diesel usage (gal)} \times 0.000212 \left( \frac{\text{lb } SO_2}{\text{gal ULSD}} \right) \times \left( \frac{1 \text{ ton } SO_2}{2000 \text{ lbs } SO_2} \right)$$

- 10) Monthly SO<sub>2</sub> emissions calculated by summing SO<sub>2</sub> emissions from all emission units
- 11) 12-month rolling total SO<sub>2</sub> emissions and the sum of all SO<sub>2</sub> emissions from startup, shutdown, and malfunction as reported to the Air Pollution Control Program's Compliance/Enforcement Section
- 12) Indication of compliance with Special Condition 4.A.

**5. Capture Device Requirement**

- A. Pittsburgh Corning Corporation shall capture emissions from the emission units in Table 5. 100% capture is not required.

**Table 5: Emission Units with Capture Efficiency, but not 100%**

Emission Unit	Emission Unit Description	Control Device
S-01	Rail receiving	Baghouse DC#5 (C-1)
S-01A	Truck receiving	Baghouse DC#5 (C-1)
S-02A	Raw material conveying (non-pneumatic)	Baghouse DC#5 (C-1)
S-03A, S-03B, S-03C	silos silo air displacement from filling	Baghouse DC#5 (C-1)
S-02	Batch mixer	Baghouse DC#6 (C-3)
S-44	Salvage saw	Dust collector DC#44 (C-44)
S-13	Finishing saws and grinders	Baghouse DC#1 or baghouse DC#13
S-41	Pre-anneal grinding	Baghouse DC#71

- B. Rail receiving (S-01) shall be operated with choke flow, and dust intake drawing from inside the pit/under grate. Pittsburgh Corning Corporation shall monitor and record at least once quarterly the presence of choke flow from the bottom of the railcar to the pit grate. Monitoring may consist of visual observation. Recording may consist of electronic documents indicating choke flow status.
- C. Truck receiving (S-01A) shall be operated with an enclosure of three sides and a roof, and dust intake duct drawing from within the partial enclosure.
- D. Conveying (non-pneumatic) (S-02A) shall be operated with complete enclosure surrounding the transfer points. The enclosure flanges need not be sealed.

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The permittee is authorized to construct and operate subject to the following special conditions:

- E. ■, ■, and ■ silo filling air displacement (S-03A, S-03B, S-03C) shall vent to a totally enclosed, but not sealed headhouse. Dust intake shall draw from within the headhouse.
  - F. Batch mixer (S-02) shall be operated using an enclosed mixer design. An additional enclosure outside of the mixer is not required. Dust intake shall draw from within the mixer enclosure.
  - G. Salvage saw (S-44) and finishing saws and grinders (S-13) shall be operated with partial enclosures, and dust intake duct drawing from within the partial enclosures.
  - H. Pittsburgh Corning Corporation shall maintain an operating and maintenance log for the capture devices which shall include the following:
    - 1.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
    - 2.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
    - 3.) Dates of all above schedules, incidents, activities, and actions.
6. Control Device Requirement - Baghouses
- A. Pittsburgh Corning Corporation shall control particulate emissions from the emission units in Table 5 using the control devices indicated.
  - B. The control devices, except DC#71, shall be operated and maintained in accordance with the manufacturers' specifications. DC#71 shall be operated and maintained in accordance with a written standard operating procedures (SOP) developed by Pittsburgh Corning Corporation. The SOP shall incorporate baghouse industry design standards. Each control device shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
  - C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). The replacement filter material type and weight shall meet or exceed the specifications of the existing filter. The air to cloth ratio or air to filter ratio shall not be increased when filter replacement is performed.

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The permittee is authorized to construct and operate subject to the following special conditions:

- D. Pittsburgh Corning Corporation shall monitor and record the operating pressure drop across the control devices at least once daily. Days with no production shall be indicated. The operating pressure drop shall be maintained within the design conditions specified by the filter manufacturer's performance warranty, except for DC#71 within the SOP.
  - E. Pittsburgh Corning Corporation shall maintain a copy of the baghouse and filter manufacturers' performance warranties on site. In the case of DC#71, a copy of the SOP shall be maintained on site in lieu of the baghouse manufacturer's performance warranty.
  - F. Pittsburgh Corning Corporation shall maintain an operating and maintenance log for the control devices which shall include the following:
    - 1.) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
    - 2.) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
    - 3.) Dates of all above schedules, incidents, activities, and actions.
7. Emission Testing
- A. Pittsburgh Corning Corporation shall test NO<sub>x</sub>, SO<sub>2</sub>, SO<sub>3</sub>, sulfuric acid mist, PM filterable, PM<sub>10</sub> total (filterable plus condensable), and PM<sub>2.5</sub> total (filterable plus condensable) emissions from Tank 4 furnace (EU S-06A).
  - B. Testing shall be performed at the maximum Tank 4 furnace capacity, ■ tph of glass pulled. If it is impractical to test at maximum capacity, an emission unit may be tested at less than the maximum capacity; in this case, subsequent operation of the emission unit is limited to 110 percent of the test rate until a new test is conducted. Once the emission unit is so limited, operation at higher capacities is allowed for no more than 15 total days for the purpose of additional compliance testing to regain the authority to operate at the maximum capacity.
  - C. All test methods shall be preapproved by the Air Pollution Control Program.
  - D. The following data shall be recorded during the tests,
    - 1) Input rate of total materials into the furnace, including ■ (tph)
    - 2) Input rate of each material into the furnace, including ■ (name, weight %)
    - 3) Nitrogen content of each material into the furnace (name, weight %)
    - 4) Sulfur content of each material into the furnace, including ■ (name, weight %)

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

- 5) Glass pull rate (tph)
  - 6) Natural gas usage rate (MMBtu/hr, MMCF/hr)
  - 7) Lb/hr emission rate for each pollutant
- E. Initial testing shall be performed within 180 days of this amendment's issuance.
- F. Subsequent testing shall be performed at least once every five years, or at a frequency established in a future permit. Testing may be conducted during testing required by MACT Subpart SSSSSS.
- G. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
- H. One electronic copy of a written report of the performance test results shall be submitted to [StackTesting@dnr.mo.gov](mailto:StackTesting@dnr.mo.gov) within 60 days of completion of any required testing. The report must include
- 1) legible copies of the raw data sheets
  - 2) analytical instrument laboratory data
  - 3) complete sample calculations from the required U.S. EPA Method for at least one sample run
  - 4) all information in Special Condition 7.D.
  - 5) calculated emission factors as indicated in Table 6

**Table 6: Emission Factors to be Calculated from Emission Tests**

Pollutant	Lb pollutant/ton glass pulled	Lb pollutant/ton glass pulled, excluding pollutant portion from natural gas combustion
PM filterable		x
PM <sub>10</sub> total		x
PM <sub>2.5</sub> total		x
SO <sub>2</sub>		x
SO <sub>3</sub>	x	
Sulfuric acid mist	x	
NO <sub>x</sub>		x

When calculating emission factors by excluding the pollutant portion from natural gas combustion:

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

PM<sub>10</sub> total and PM<sub>2.5</sub> total: assume 7.6 lb PM<sub>10</sub> total and 7.6 lb PM<sub>2.5</sub> total / MMCF natural gas combustion.  
SO<sub>2</sub>: assume 0.6 lb SO<sub>2</sub> / MMCF natural gas combustion.  
NO<sub>x</sub>: assume 100 lb NO<sub>x</sub> / MMCF natural gas combustion.

- I. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations.
8. Record Keeping and Reporting Requirements
- A. Pittsburgh Corning Corporation shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
  - B. Pittsburgh Corning Corporation shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.