Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: **OP2011-052**
Expiration Date: JUN 03 2017
Installation ID: **071-0230**
Project Number: **2011-02-024**

Installation Name and Address
Plaze, Inc. - Pacific
1000 Integram Dr.
Pacific, MO 63069-3450
Franklin County

Parent Company's Name and Address
Plaze, Inc.
105 Bolte Ln.
St. Clair, MO 63077-3219

Installation Description:
Plaze, Inc. – Pacific is a new custom aerosol can packager located in Pacific, Missouri. The installation was still under construction during the 2010 reporting year. Some chemicals will be blended onsite while other chemicals will be received preblended. The blended products will then be transported to the production lines to fill cans and bottles. The filled cans and bottles will then be sent to a gassing house for pressurization with propellants. The final product will be date coded and weighed. Some cans may then be screen printed. Prior to shipping a final pressure test will be conducted in hot water baths to ensure the cans adhere to Department of Transporation specifications. The installation is a synthetic minor source of Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), Hexane (110-54-3), Trichloroethylene (79-01-6), Methanol (67-56-1), and Tetrachloroethylene (127-18-4).

JUN 04 2012
Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Plaze, Inc. – Pacific is a new custom aerosol can packager located in Pacific, Missouri. The installation was still under construction during the 2010 reporting year. Some chemicals will be blended onsite while other chemicals will be received preblended. The blended products will then be transported to the production lines to fill cans and bottles. The filled cans and bottles will then be sent to a gassing house for pressurization with propellants. The final product will be date coded and weighed. Some cans may then be screen printed. Prior to shipping a final pressure test will be conducted in hot water baths to ensure the cans adhere to Department of Transporation specifications. The installation is a synthetic minor source of Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), Hexane (110-54-3), Trichloroethylene (79-01-6), Methanol (67-56-1), and Tetrachloroethylene (127-18-4).

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

Emission Unit	Description
EP-01	9,000 gallon Chemical Bulk Storage Tank
EP-02	9,000 gallon Chemical Bulk Storage Tank
EP-03	9,000 gallon Chemical Bulk Storage Tank
EP-04	9,000 gallon Chemical Bulk Storage Tank
EP-05	9,000 gallon Chemical Bulk Storage Tank
EP-06	9,000 gallon Chemical Bulk Storage Tank
EP-07	9,000 gallon Chemical Bulk Storage Tank
EP-08	9,000 gallon Chemical Bulk Storage Tank
EP-09	9,000 gallon Chemical Bulk Storage Tank
EP-10	9,000 gallon Chemical Bulk Storage Tank
EP-11	9,000 gallon Chemical Bulk Storage Tank
EP-12	9,000 gallon Chemical Bulk Storage Tank
EP-13	9,000 gallon Chemical Bulk Storage Tank
EP-14	9,000 gallon Chemical Bulk Storage Tank
EP-15	9,000 gallon Chemical Bulk Storage Tank
EP-16	9,000 gallon Chemical Bulk Storage Tank
EP-19a	Batch Mixing Room #1
EP-19b	Batch Mixing Room #2
EP-20	6.5 MMBtu/hr Natural Gas Fired Steam Boilers
EP-21	Silk Screen Printing

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Emission Unit	Description
EP-17	Losses From Gassing Aerosol Cans
EP-18	Coding Ink For Cans And Boxes

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 042010-017, Issued April 28, 2010

Emission Limitation:
Special Condition 1.A: The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

Operational Limitation:
Special Condition 3: The permittee shall keep all ink, solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on inks, solvent and cleaning solution containers used at the installation.

Monitoring/Record Keeping:
1. Special Condition 1.B: Attachments A and B or equivalent forms generated by the permittee and approved by the Air Pollution Control Program shall be used to demonstrate compliance. The permittee shall retain all records 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 Material Safety Data Sheets (MSDS) for all VOC containing materials used at the installation.
2. Records may be kept in either written or electronic form.

Reporting:
1. Special Condition 1.C: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the VOC emission limitation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/record keeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitations:
1. The permittee shall emit less than ten tons of each individual Hazardous Air Pollutant (HAP) from the installation in any consecutive 12-month period.
2. The permittee shall emit less than twenty-five tons combined of HAPs from the installation in any consecutive 12-month period.

Monitoring/Record Keeping:

1. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAP using Attachments B, C, D, and E or equivalent forms generated by the permittee.
2. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all HAP containing materials at the installation.
3. Records may be kept in either written or electronic form.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of either of the HAP emission limitations.
2. The permittee shall report any deviations from the emission limitations, monitoring/record keeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW003

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart VVVVVV – National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources

Definitions: [§63.11502(b)]

1. *Batch process vent* means a vent from a CMPU or vents from multiple CMPUs within a process that are manifolded together into a common header, through which a HAP-containing gas stream is, or has the potential to be, released to the atmosphere. Batch process vents include vents with intermittent flow from continuous operations that are not combined with any stream that originated as a continuous gas stream from the same continuous process. Examples of batch process vents include, but are not limited to, vents on condensers used for product recovery, reactors, filters, centrifuges, and process tanks. The following are not batch process vents for the purposes of this subpart:
   a) Continuous process vents;
   b) Bottoms receivers;
   c) Surge control vessels;
   d) Gaseous streams routed to a fuel gas system(s);
   e) A gas stream routed to other processes for reaction or other use in another process (i.e., for chemical value as a product, isolated intermediate, byproduct, or coproduct, or for heat value).
   f) Vents on storage tanks or wastewater systems;
   g) Drums, pails, and totes; and
   h) Emission streams from emission episodes that are undiluted and uncontrolled containing less than 50 ppmv HAP are not part of any batch process vent. The HAP concentration may be determined using any of the following: process knowledge, an engineering assessment, or test data.
2. *Chemical manufacturing process* means all equipment which collectively functions to produce a product or isolated intermediate. A process includes, but is not limited to any, all, or a combination of reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment

which are used to produce a product or isolated intermediate. A process is also defined by the following:

a) Routine cleaning operations conducted as part of batch operations are considered part of the process;
b) Each nondedicated solvent recovery operation is considered a single process;
c) Each nondedicated formulation operation is considered a single process;
d) Quality assurance/quality control laboratories are not considered part of any process;
e) Ancillary activities are not considered a process or part of any process; and
f) The end of a process that produces a solid material is either up to and including the dryer or extruder, or for a polymer production process without a dryer or extruder, it is up to and including the die plate or solid-state reactor, except in two cases. If the dryer, extruder, die plate, or solid-state reactor is followed by an operation that is designed and operated to remove HAP solvent or residual monomer from the solid, then the solvent removal operation is the last step in the process. If the dried solid is diluted or mixed with a HAP-based solvent, then the solvent removal operation is the last step in the process.

3. *Deviation* means any instance in which an affected source subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart, including, but not limited to any emissions limitation or management practice; or fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit.
4. *Equipment* means each pump, compressor, agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector, and instrumentation system in or associated with a CMPU.
5. *Process vessel* means each vessel, except hand-held containers, used in the processing of raw materials to chemical products. Examples include, but are not limited to reactors, distillation units, centrifuges, mixing vessels, and process tanks.

Management Practices:

1. Each process vessel in organic HAP service shall be equipped with a cover or lid that shall be in place at all times when the vessel contains HAP, except for material addition and sampling. [§63.11495(a)(1)]
2. The permittee shall conduct inspections of process vessels and equipment for each CMPU in organic HAP service at least quarterly to demonstrate compliance with these requirements and to determine that the process vessels and equipment are sound and free of leaks. For these inspections, detection methods incorporating sight, sound, or smell are acceptable. The inspection shall include direct and proximal (thorough) inspection of all areas of potential leak within the CMPU. Indications of a leak identified using such method constitutes a leak unless the permittee demonstrates that the indications of a leak are due to a condition other than loss of HAP. Alternatively, Method 21 of 40 CFR Part 60, Appendix A–7, with a leak definition of 500 parts per million by volume (ppmv), may be used for detection of leaks or to determine if the indications of a leak are due to a condition other than loss of HAP. If indications of a leak are determined not to be HAP in one quarterly monitoring period, the permittee shall still perform the inspection and demonstration in the next quarterly monitoring period. Inspections shall be conducted while the subject CMPU is operating. No inspection is required in a calendar quarter during which the subject CMPU does not operate for the entire calendar quarter and is not in organic HAP service. If the CMPU operates at all during a calendar quarter, an inspection is required. [§63.11495(a)(3)]

3. The permittee shall repair any leak within 15 calendar days after detection of the leak, or document the reason for any delay of repair. For the purposes of this paragraph, a leak will be considered "repaired" if one of the following conditions is met: [§63.11495(a)(4)]
   a) The visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated, or [§63.11495(a)(4)(i)]
   b) No bubbles are observed at potential leak sites during a leak check using soap solution, or [§63.11495(a)(4)(ii)]
   c) The system will hold a test pressure. [§63.11495(a)(4)(iii)]
4. The permittee shall retain records of the dates and results of each inspection event, the dates of equipment repairs, and, if applicable, the reasons for any delay in repair. [§63.11495(a)(5)]
5. Startup, shutdown, and malfunction (SSM) provisions in subparts that are referenced in Paragraph (a) of this section do not apply. [§63.11495(c)]

Standards:

1. *Organic HAP emissions from batch process vents.* The permittee shall comply with the requirements in Paragraphs (a)(1) through (4) of this section for organic HAP emissions from batch process vents for each CMPU using Table 1 organic HAP. If uncontrolled organic HAP emissions from all batch process vents from a CMPU subject to this subpart are equal to or greater than 10,000 lb/yr, the permittee shall also comply with the emission limits and other requirements in Table 2 to this subpart. [§63.11496(a)]
   a) The permittee shall determine the sum of actual organic HAP emissions from all batch process vents within a CMPU subject to this subpart using process knowledge, engineering assessment, or test data. Emissions for a standard batch in a process may be used to represent actual emissions from each batch in that process. The permittee shall retain records of the calculations. Calculations of annual emissions are not required if the permittee meets the emission standards for batch process vents in Table 2 to this subpart. [§63.11496(a)(1)]
   b) As an alternative to calculating actual emissions for each affected CMPU, the permittee may elect to estimate emissions for each CMPU based on the emissions for the worst-case CMPU. The worst-case CMPU means the CMPU at the affected source with the highest organic HAP emissions per batch. The worst-case emissions per batch are used with the number of batches run for other affected CMPU. Process knowledge, engineering assessment, or test data may be used to identify the worst-case process. The permittee shall retain records of the information and procedures used to identify the worst-case process. [§63.11496(a)(2)]
   c) If estimated emissions from batch process vents from a CMPU are less than 10,000 lb/yr, then the permittee shall retain a record of the number of batches of each process operated per month. Also, the permittee shall reevaluate total emissions from batch process vents prior to making any process changes that affect emission calculations in Paragraphs (a)(1) and (2) of this section. If projected emissions increase to 10,000 lb/yr or more, the permittee shall comply with the requirements for batch process vents in Table 2 to this subpart upon initiating operation under the new operating conditions. The permittee shall retain records documenting the results of all updated emissions calculations. [§63.11496(a)(3)]
   d) As an alternative to determining HAP emissions, the permittee may elect to demonstrate that the amount of organic HAP used in the process is less than 10,000 lb/yr. The permittee shall retain monthly records of organic HAP usage. [§63.11496(a)(4)]
2. *Alternative standard for organic HAP.* Exceptions to the requirements for the alternative standard requirements specified in Table 2 to this subpart and §63.2505 as follows: [§63.11496(e)]

a) When §63.2505 of Subpart FFFF refers to Tables 1 and 2 to Subpart FFFF and §63.2455 and §63.2460, it means Table 2 to this subpart and §63.11496(a). [§63.11496(e)(1)]
b) Sections 63.2505(a)(2) and (b)(9) do not apply. [§63.11496(e)(2)]
c) When §63.1258(b)(5)(ii)(B)(2) refers to a "notification of process change" report, it means the semi-annual compliance report required by §63.11501(d) for the purposes of this subpart. [§63.11496(e)(5)]

3. *Startup, shutdown, and malfunction (SSM).* References to SSM provisions in subparts that are referenced in Paragraphs (a), (e), and (h) of this section or Table 2 to this subpart do not apply. [§63.11496(i)]

Table 1 to Subpart VVVVVV of Part 63 — *Hazardous Air Pollutants Used To Determine Applicability of Chemical Manufacturing Operations*

As required in §63.11494(a), chemical manufacturing operations that process, use, or produce the HAP shown in the following table are subject to Subpart VVVVVV.

Type of HAP	Chemical name	CAS No.
Organic compounds	Methylene chloride	75-09-2

Table 2 to Subpart VVVVVV of Part 63 — *Emission Limits and Compliance Requirements for Batch Process Vents*

Emission Source	Requirements	Exceptions
Batch process vents in a CMPU at a new source for which the total organic HAP emissions are equal to or greater than 10,000 lb/yr	Reduce collective uncontrolled total organic HAP emissions from the sum of all batch process vents by ≥90 percent by weight or to ≤20 ppmv by routing emissions from a sufficient number of the batch process vents through a closed vent system to any combination of control devices (except a flare) in accordance with the requirements of §63.982(c) and the requirements referenced therein; or	Compliance may be based on either total organic HAP or total organic carbon (TOC); and as specified in §63.11496(g).
	Route emissions from batch process vents containing at least 90 percent of the uncontrolled total organic HAP through a closed-vent system to a flare (except that a flare may not be used to control halogenated vent streams) in accordance with the requirements of §63.982(b) and the requirements referenced therein; or	Not applicable.
	Comply with the alternative standard specified in §63.2505 and the requirements referenced therein; or	As specified in §63.11496(e) of this subpart.
	Comply with combinations of the above for different groups of batch process vents	The information specified above, as applicable.
Halogenated batch process vent stream at a new or existing source that is controlled through combustion	Comply with the requirements for halogen scrubbers in §63.11496(d).	

Compliance Options:

1. For any CMPU subject to the provisions of both this subpart and another rule, the permittee may elect to comply only with the more stringent provisions as specified in Paragraph (a) of this section. The permittee shall consider all provisions of the rules, including monitoring, record keeping, and reporting. The permittee shall identify the subject CMPU and the provisions with which the permittee shall comply in their NOCS report required by §63.11501(b). The permittee shall also demonstrate in their NOCS report that each provision with which the permittee shall comply is at least as stringent as the otherwise applicable requirement in this Subpart VVVVVV. The permittee is responsible for making accurate determinations concerning the more stringent standards and noncompliance with this rule is not excused if it is later determined that the permittee's determination was in error and, as a result, the permittee is violating this subpart. Compliance with this rule is the permittee's responsibility and the NOCS report does not alter or affect that responsibility. [§63.11500]
   a) *Compliance with other subparts of this Part 63.* If any part of a CMPU that is subject to the provisions of this subpart is also subject to the provisions of another subpart of 40 CFR Part 63, then compliance with any of the requirements in the other subpart of this Part 63 that are at least as stringent as the corresponding requirements in Subpart VVVVVV constitutes compliance with this Subpart VVVVVV. [§63.11500(a)]

Notifications, Record Keeping, and Reporting:

1. *General provisions.* The permittee shall meet the requirements of the General Provisions in 40 CFR Part 63, Subpart A, as shown in Table 9 to this subpart. The General Provisions in other parts do not apply except when a requirement in an overlapping standard, which is at least as stringent as Subpart VVVVVV and with which the permittee has opted to comply, requires compliance with general provisions in another part. [§63.11501(a)]
2. *Notification of compliance status (NOCS).* The NOCS required by §63.9(h) shall include the following additional information as applicable: [§63.11501(b)]
   a) This certification of compliance, signed by a responsible official: [§63.11501(b)(1)]
      i) "This facility complies with the management practices in §63.11495." [§63.11501(b)(1)(i)]
      ii) "This facility complies with the requirements in §63.11496 for HAP emissions from process vents." [§63.11501(b)(1)(ii)]
   b) If the permittee elects to comply with the alternative standard as specified in Table 2 to this subpart, include the information specified in §63.1258(b)(5), as applicable. [§63.11501(b)(2)]
   c) If the permittee complies with provisions in an overlapping rule in accordance with §63.11500, the permittee shall identify the affected CMPU; provide a list of the specific provisions with which the permittee will comply; and demonstrate that the provisions which the permittee will comply with are at least as stringent as the otherwise applicable requirements, including monitoring, record keeping, and reporting requirements, in this Subpart VVVVVV. [§63.11501(b)(5)]
3. *Record keeping.* The permittee shall retain all information required by this subpart for at least five years following the date of each occurrence according to the requirements in §63.10(b)(1). The permittee shall comply with the record keeping requirements of §63.10(b)(2) and the following applicable requirements: [§63.11501(c)]
   a) For each CMPU subject to this subpart the permittee shall retain the following records, as applicable: [§63.11501(c)(1)]
      i) Records of management practice inspections, repairs, and reasons for any delay of repair, as specified in §63.11495(a)(5). [§63.11501(c)(1)(i)]

ii) If batch process vent emissions are less than 10,000 lb/yr for a CMPU, records of batch process vent emission calculations, as specified in §63.11496(a)(1), the number of batches operated each month, as specified in §63.11496(a)(3), and any updated emissions calculations, as specified in §63.11496(a)(3). Alternatively, keep records of the worst-case processes or organic HAP usage, as specified in §63.11496(a)(2) and (4), respectively. [§63.11501(c)(1)(iii)]

b) For batch process vents subject to Table 2 to this subpart, the permittee shall retain the following records, as applicable: [§63.11501(c)(2)]

i) If the permittee routes emissions to a control device other than a flare, the permittee shall retain records of performance tests, if applicable, as specified in §63.998(a)(2)(ii) and (4), the permittee shall retain records of the monitoring system and the monitored parameters, as specified in §63.998(b) and (c), and the permittee shall retain records of the closed-vent system, as specified in §63.998(d)(1). [§63.11501(c)(2)(i)]

ii) If the permittee routes emissions to a flare, the permittee shall retain records of the flare compliance assessment, as specified in §63.998(a)(1)(i), the permittee shall retain records of the pilot flame monitoring, as specified in §63.998(a)(1)(ii) and (iii), and the permittee shall retain records of the closed-vent system, as specified in §63.998(d)(1). [§63.11501(c)(2)(ii)]

4. *Semi-annual Compliance Reports.* The permittee shall submit semi-annual compliance reports that contain the information specified in Paragraphs (d)(1) through (7) of this section, as applicable. Reports are required only for semi-annual periods during which the permittee experienced any of the events described in Paragraphs (d)(1) through (7) of this section. [§63.11501(d)]

a) *Deviations.* The permittee shall clearly identify any deviation from the requirements of this subpart. [§63.11501(d)(1)]

b) *Delay of leak repair.* The permittee shall provide the following information for each delay of leak repair beyond 15 days for any process equipment: information on the date the leak was identified, the reason for the delay in repair, and the date the leak was repaired. [§63.11501(d)(3)]

c) *Process change.* The permittee shall report each process change that affects a compliance determination and submit a new certification of compliance with the applicable requirements in accordance with the procedures specified in Paragraph (b) of this section. [§63.11501(d)(4)]

d) *Data for the alternative standard.* If the permittee elects to comply with the alternative standard, as specified in Table 2 to this subpart, the permittee shall report the information required in §63.1258(b)(5). [§63.11501(d)(5)]

e) *Overlapping rule requirements.* The permittee shall report any changes in the overlapping provisions with which the permittee complies. [§63.11501(d)(6)]

5. Records may be kept in either written or electronic form.
6. Records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
7. The permittee shall report any deviations from the management practices, standards, notifications, record keeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Table 9 to Subpart VVVVVV of Part 63 — *General Provisions Applicable to Subpart VVVVVV*

General Provision	Applies to Subpart VVVVVV?
Applicability 63.1(a)(1)-(4), (a)(6), (a)(10)-(12); (b)(1), (3); (c)(1), (2), (5); (e)	Yes
Definitions 63.2	Yes
Units and Abbreviations 63.3	Yes
Prohibited Activities and Circumvention 63.4	Yes
Preconstruction Review and Notification Requirements 63.5	Yes
Compliance with Standards and Maintenance Requirements 63.6(a); (b)(1)-(5), (7); (c)(1)-(2), (5); (e)(1)(iii); (g); (i); (j)	Yes
Performance Testing Requirements 63.7(a)(1), (3)-(4); (c); (e)(4); (f)-(h)	Yes
Monitoring Requirements 63.8(a)(1), (4); (b); (c)(1)-(3); (f)(1)-(5)[1]	Yes
63.8(c)(6)-(8); (d); (e); (f)(6)[2]	Yes
63.8(g)(1)-(4)[3]	Yes
Notification Requirements 63.9(a); (b)(1)-(2), (4)-(5); (c)-(e); (i)	Yes
63.9(g)[4]	Yes
63.9(h)(1)-(3), (5)-(6)[5]	Yes
Change in Information Already Provided 63.9(j)[6]	No
Record keeping Requirements 63.10(a)	Yes
63.10(b)(1)	Yes
63.10(b)(2)(i)-(v)[7]	Yes
63.10(b)(2)(vi), (x), (xi), (xiii)[8]	Yes
63.10(b)(2)(vii)-(ix), (xii), (xiv)	Yes
63.10(b)(3)	Yes
63.10(c)(1), (5)-(6), (13)-(14)[8]	Yes
63.10(c)(7)-(8), (10)-(12), (15)[7]	Yes
Reporting Requirements 63.10(d)(1)-(2), (4); (e)(1)-(2); (f)	Yes
63.10(e)(1)-(2)[8]	Yes
63.10(e)(3)	Yes
Control Device Requirements 63.11	Yes
State Authorities and Delegations 63.12	Yes
Addresses 63.13	Yes
Incorporations by Reference 63.14	Yes
Availability of Information and Confidentiality 63.15	Yes
Performance Track Provisions 63.16	Yes

[1] References to SSM in §63.8(c) do not apply.
[2] Requirements apply only if you use a continuous emission monitoring system (CEMS) to demonstrate compliance with the alternative standard in §63.11496(e). References to SSM in §63.8(d) do not apply.
[3] Data reduction requirements apply only if you use CEMS to demonstrate compliance with alternative standard in §63.11496(e). COMS requirements do not apply. Requirement in §63.8(g)(2) does not apply because data reduction for CEMS are specified in 40 CFR Part 63, Subpart FFFF.
[4] Additional notification requirement applies only if the permittee uses a CEMS to demonstrate compliance with alternative standard in §63.11496(e).
[5] Except Subpart VVVVVV does not contain opacity or VE limits.
[6] Notification of process changes that affect a compliance determination are required in §63.11501(d)(4).
[7] Any references to SSM do not apply.
[8] Apply only if the permittee uses a CEMS to demonstrate compliance with alternative standard in §63.11496(e).

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION 001
EP-20 Steam Boilers
10 CSR 10-5.030 Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating

Emission Unit	Description	Fuel	Heat Input (MMBtu/hr)
EP-20	Steam Boilers	Natural Gas	6.5

Emission Limitation:
The permittee shall not emit particulate matter in excess of 0.40 pounds per million BTU of heat input.

Operational Limitation:
The permittee shall calibrate, maintain and operate the emission units according to the manufacturer's specifications and recommendations.

Monitoring/Record Keeping:
1. Maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment F or an equivalent form generated by the permittee.
2. Attachment G contains calculations which demonstrate that the emission unit will never exceed the emission limitation while burning the specified fuel.
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

Reporting:
1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/record keeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002

EP-21 Silk Screen Printing

10 CSR 10-6.060 Construction Permits Required

Construction Permit 042010-017, Issued April 28, 2010

Emission Unit	Description
EP-21	Silk Screen Printing

Operational Limitation:

Special Condition 2.A: The permittee shall screen print (EP-21) less than 18,000,000 cans in any consecutive 12-month period.

Monitoring/Record Keeping:

1. Special Condition 2.B: Attachment B or an equivalent form generated by the permittee and approved by the Air Pollution Control Program shall be used to demonstrate compliance. The permittee shall retain all records for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
2. Records may be kept in either written or electronic form.

Reporting:

1. Special Condition 2.C: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten days after the end of the month during which records indicate an exceedance of the production limitation.
2. The permittee shall report any deviations from the operational limitation, monitoring/record keeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003

EP-19 Batch Mixing Rooms

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Unit	Description
EP-19a	Batch Mixing Room #1
EP-19b	Batch Mixing Room #2

Operational Limitations:

1. The total capacity of each batch mixing room shall not exceed 50,000 gallons.
2. The batch mixing rooms shall not contain any tank in excess of 19,812 gallons.

Monitoring/Record Keeping:

1. The permittee shall track the total capacity of each batch mixing room using Attachment H or an equivalent form generated by the permittee. The permittee shall revise Attachment H with each addition and removal of a tank from one of the batch mixing rooms.
2. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all VOC and HAP containing materials within each batch mixing room.
3. Records may be kept in either written or electronic form.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of either of the operational limitations.
2. The permittee shall report any deviations from the operational limitations, monitoring/record keeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004
Emission Points EP-01 thru EP-16 Chemical Bulk Storage Tanks
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Unit	Description
EP-01	9,000 gallon Chemical Bulk Storage Tank
EP-02	9,000 gallon Chemical Bulk Storage Tank
EP-03	9,000 gallon Chemical Bulk Storage Tank
EP-04	9,000 gallon Chemical Bulk Storage Tank
EP-05	9,000 gallon Chemical Bulk Storage Tank
EP-06	9,000 gallon Chemical Bulk Storage Tank
EP-07	9,000 gallon Chemical Bulk Storage Tank
EP-08	9,000 gallon Chemical Bulk Storage Tank
EP-09	9,000 gallon Chemical Bulk Storage Tank
EP-10	9,000 gallon Chemical Bulk Storage Tank
EP-11	9,000 gallon Chemical Bulk Storage Tank
EP-12	9,000 gallon Chemical Bulk Storage Tank
EP-13	9,000 gallon Chemical Bulk Storage Tank
EP-14	9,000 gallon Chemical Bulk Storage Tank
EP-15	9,000 gallon Chemical Bulk Storage Tank
EP-16	9,000 gallon Chemical Bulk Storage Tank

Operational Limitation:

The permittee shall only store liquids which have the same or lower emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) than Hexane (Cas No. 110-54-3) within these tanks. Where Hexane (CAS No. 110-54-3) has a maximum true vapor pressure of 3.906 psia at 90^{o}F.

Monitoring/Record Keeping:

1. The permittee shall maintain a log for each chemical bulk storage tank documenting the tank contents and the maximum true vapor pressure of the contents. The maximum true vapor pressure of the contents shall be obtained from AP-42's Table 7.1-3 or TANKS.
2. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all chemicals stored in these bulk storage tanks.
3. The permittee 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.
4. Records may be kept electronically or in paper form.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring/record keeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
   a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exception:
      i) St. Louis metropolitan area. The open burning of household refuse is prohibited;
   b) Yard waste, with the following exception:
      i) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
4) Plaze, Inc. - Pacific may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Plaze, Inc. - Pacific fails to comply with the provisions or any condition of the open burning permit.
   a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS

40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.

6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the Department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2) The permittee may be required by the Director to file additional reports.
3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
5) Full paper EIQs shall be submitted to the Air Pollution Control Program by no later than April 1st after the end of the reporting year. Full electronic EIQs shall be submitted via MoEIS by no later than May 1st after the end of the reporting year.
6) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.

7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from theses sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.

d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the Director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and

c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
   b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

1) June 21, 1999;
2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

The installation is permitted to change out tanks within each batch mixing room (EP-19a and EP-19b) provided the following conditions are met:

1) No tank within either batch mixing room shall have a capacity in excess of 19,812 gallons.
2) The total capacity of each batch mixing room shall not exceed 50,000 gallons.
3) Each tank's VOC and HAP emissions are still calculated to demonstrate compliance with the 10 ton plantwide individual HAP limit, 25 ton plantwide combined HAP limit, and 100 ton plantwide VOC limit.
4) All tanks containing or used to mix materials containing methylene chloride shall meet the requirements of 40 CFR Part 63, Subpart VVVVVV or 40 CFR Part 63, Subpart CCCCCCC.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;

d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Gary L. Myers, Regulatory Affairs Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental

permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A
Plantwide VOC Tracking Sheet

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.)[1]	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)[2]	VOC Emissions (lbs/month)
EP-01	Chemical Bulk Storage Tanks				
EP-02					
EP-03					
EP-04					
EP-05					
EP-06					
EP-07					
EP-08					
EP-09					
EP-10					
EP-11					
EP-12					
EP-13					
EP-14					
EP-15					
EP-16					
EP-19a	Batch Mixing Room #1				
EP-19b	Batch Mixing Room #2				
			(cans)	**(lbs/can)**	**(lbs/month)**
EP-17	Losses From Charging Aerosol Cans			0.0012	
			(tons)	**(lbs/ton)**	**(lbs/month)**
EP-18	Coding Ink For Cans and Boxes			2000	
			(MMscf)	**(lbs/MMscf)**	**(lbs/month)**
EP-20	Steam Boilers			5.5	
			(gallons)	**(lbs/gallon)**	**(lbs/month)**
EP-21	Silk Screening Inks			5.2	
Monthly VOC Emissions (lbs/month):					

[1]The permittee shall document the chemical stored/used during the reporting period. When multiple chemicals were stored/used, the permittee shall list the chemical stored/used which has the highest volatility for VOCs.
[2]Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

Attachment A Continued
Plantwide VOC Tracking Sheet

Tank Standing Losses					
Emission Unit	**Description**	**Chemical Stored/Used (Name and CAS No.)[1]**	**Tank Capacity (1000 gallons)**	**Emission Factor (lbs/1000 gallons-years)[2]**	**VOC Emissions (tons/year)**
EP-01	Chemical Bulk Storage Tanks		9		
EP-02			9		
EP-03			9		
EP-04			9		
EP-05			9		
EP-06			9		
EP-07			9		
EP-08			9		
EP-09			9		
EP-10			9		
EP-11			9		
EP-12			9		
EP-13			9		
EP-14			9		
EP-15			9		
EP-16			9		
EP-19a	Batch Mixing Room #1		50[3]		
EP-19b	Batch Mixing Room #2		50[3]		
Annual Tank Standing Losses (tons/year):					

[1]The permittee shall document the chemical stored/used during the reporting period. When multiple chemicals were stored/used, the permittee shall list the chemical stored/used which has the highest volatility for VOCs.
[2]Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.
[3]Each of the batch mixing rooms contain many small tanks, but each is limited to a maximum total tank capacity of 50,000 gallons by Permit Condition 003.

Attachment B
Plantwide 12- Month Rolling Totals

Month and Year	VOC Emissions (tons/year)[1]	Combined HAP Emissions (tons/year)[1]	Hexane Emissions (tons/year)[1]	Trichloroethylene Emissions (tons/year)[1]	Methanol Emissions (tons/year)[1]	Tetrachloroethylene Emissions (tons/year)[1]	EP-21 Silk Screen Printing	
							Monthly Production (cans/month)	Annual Production (cans/year)

[1]Emissions (tons/year) = Annual Tank Standing Losses (tons/year) + $\frac{\text{the sum of the most recent 12 Monthly Emissions (lbs/month)}}{\text{2000 (lbs/ton)}}$

The permittee is in compliance with Permit Condition PW001 if VOC emissions are less than 100 tons/year.
The permittee is in compliance with Permit Condition PW002 if Combined HAP emissions are less than 25 tons/year, Hexane (110-54-3) emissions are less than 10 tons/year, Trichloroethylene (79-01-6) emissions are less than 10 tons/year, Methanol (67-56-1) emissions are less than 10 tons/year, and Tetrachloroethylene (127-18-4) emissions are less than 10 tons/year.
The permittee is in compliance with Permit Condition 002 if EP-21 Silk Screen Printing has an annual production of less than 18,000,000 cans.

Attachment C
Plantwide Combined HAP Tracking Sheet

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.)[1]	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)[2]	HAP Emissions (lbs/month)
EP-01	Chemical Bulk Storage Tanks				
EP-02					
EP-03					
EP-04					
EP-05					
EP-06					
EP-07					
EP-08					
EP-09					
EP-10					
EP-11					
EP-12					
EP-13					
EP-14					
EP-15					
EP-16					
EP-19a	Batch Mixing Room #1				
EP-19b	Batch Mixing Room #2				
			(tons)	**(lbs/ton)**	**(lbs/month)**
EP-18	Coding Ink For Cans and Boxes			1300	
			(MMscf)	**(lbs/MMscf)**	**(lbs/month)**
EP-20	Steam Boilers			1.89	
			(gallons)	**(lbs/gallon)**	**(lbs/month)**
EP-21	Silk Screening Inks			4.79	
Monthly HAP Emissions (lbs/month):					

[1]The permittee shall document the chemical stored/used during the reporting period. When multiple chemicals were stored/used, the permittee shall list the chemical stored/used which has the highest volatility for HAPs.
[2]Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

Attachment C Continued
Plantwide Combined HAP Tracking Sheet

Tank Standing Losses					
Emission Unit	**Description**	**Chemical Stored/Used (Name and CAS No.)[1]**	**Tank Capacity (1000 gallons)**	**Emission Factor (lbs/1000 gallons-years)[2]**	**HAP Emissions (tons/year)**
EP-01	Chemical Bulk Storage Tanks		9		
EP-02			9		
EP-03			9		
EP-04			9		
EP-05			9		
EP-06			9		
EP-07			9		
EP-08			9		
EP-09			9		
EP-10			9		
EP-11			9		
EP-12			9		
EP-13			9		
EP-14			9		
EP-15			9		
EP-16			9		
EP-19a	Batch Mixing Room #1		50[3]		
EP-19b	Batch Mixing Room #2		50[3]		
Annual Tank Standing Losses (tons/year):					

[1]The permittee shall document the chemical stored/used during the reporting period. When multiple chemicals were stored/used, the permittee shall list the chemical stored/used which has the highest volatility for combined HAPs.
[2]Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.
[3]Each of the batch mixing rooms contain many small tanks, but each is limited to a maximum total tank capacity of 50,000 gallons by Permit Condition 003.

Attachment D
Plantwide Hexane (110-54-3) and Trichloroethylene (79-01-6) Tracking Sheets

Hexane (110-54-3)

Emission Unit	Description	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)	Hexane Emissions (lbs/month)
EP-01 thru EP-16	Chemical Bulk Storage Tanks		0.98	
EP-19a	Batch Mixing Room #1		1.07	
EP-19b	Batch Mixing Room #2		1.07	
		(MMscf)	**(lbs/MMscf)**	**(lbs/month)**
EP-20	Steam Boilers		1.89	
Monthly Hexane Emissions (lbs/month):				

Tank Standing Losses				
Emission Unit	**Description**	**Total Tank Capacity (1000 gallons)[1]**	**Emission Factor (lbs/1000 gallons-years)**	**Hexane Emissions (tons/year)**
EP-01 thru EP-16	Chemical Bulk Storage Tanks		33.66	
EP-19a	Batch Mixing Room #1		19.01	
EP-19b	Batch Mixing Room #2		19.01	
Annual Tank Standing Losses (tons/year):				

[1]Total tank capacity holding Hexane (110-54-3).

Trichloroethylene (79-01-6)

Emission Unit	Description	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)	Trichloroethylene Emissions (lbs/month)
EP-01 thru EP-16	Chemical Bulk Storage Tanks		0.63	
EP-19a	Batch Mixing Room #1		0.69	
EP-19b	Batch Mixing Room #2		0.69	
Monthly Trichloroethylene Emissions (lbs/month):				

Tank Standing Losses				
Emission Unit	**Description**	**Total Tank Capacity (1000 gallons)[2]**	**Emission Factor (lbs/1000 gallons-years)**	**Trichloroethylene Emissions (tons/year)**
EP-01 thru EP-16	Chemical Bulk Storage Tanks		22.11	
EP-19a	Batch Mixing Room #1		13.58	
EP-19b	Batch Mixing Room #2		13.58	
Annual Tank Standing Losses (tons/year):				

[2]Total tank capacity holding Trichloroethylene (79-01-6).

Attachment E

Plantwide Methanol (67-56-1) and Tetrachloroethylene (127-18-4) Tracking Sheets

Methanol (67-56-1)

Emission Unit	Description	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)	Methanol Emissions (lbs/month)
EP-01 thru EP-16	Chemical Bulk Storage Tanks		0.27	
EP-19a	Batch Mixing Room #1		0.30	
EP-19b	Batch Mixing Room #2		0.30	
		(tons)	**(lbs/ton)**	**(lbs/month)**
EP-18	Coding Ink For Cans and Boxes		1300	
Monthly Methanol Emissions (lbs/month):				

Tank Standing Losses				
Emission Unit	**Description**	**Total Tank Capacity (1000 gallons)[1]**	**Emission Factor (lbs/1000 gallons-years)**	**Methanol Emissions (tons/year)**
EP-01 thru EP-16	Chemical Bulk Storage Tanks		10.01	
EP-19a	Batch Mixing Room #1		5.82	
EP-19b	Batch Mixing Room #2		5.82	
Annual Tank Standing Losses (tons/year):				

[1]Total tank capacity holding Methanol (67-56-1).

Tetrachloroethylene (127-18-4)

Emission Unit	Description	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)	Tetrachloroethylene Emissions (lbs/month)
EP-01 thru EP-16	Chemical Bulk Storage Tanks		0.20	
EP-19a	Batch Mixing Room #1		0.22	
EP-19b	Batch Mixing Room #2		0.22	
Monthly Tetrachloroethylene Emissions (lbs/month):				

Tank Standing Losses				
Emission Unit	**Description**	**Total Tank Capacity (1000 gallons)[2]**	**Emission Factor (lbs/1000 gallons-years)**	**Tetrachloroethylene Emissions (tons/year)**
EP-01 thru EP-16	Chemical Bulk Storage Tanks		6.90	
EP-19a	Batch Mixing Room #1		4.65	
EP-19b	Batch Mixing Room #2		4.65	
Annual Tank Standing Losses (tons/year):				

[2]Total tank capacity holding Tetrachloroethylene (127-18-4).

Attachment F
Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # or CVM # _____

Date/ Time	Inspection/ Maintenance Activities	Malfunction Activities					
		Malfunction	Impact	Duration	Cause	Action	Initials

Attachment G
10 CSR 10-5.030 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating.* Installation's Total Heat Input (Q) in MMBtu/hr:

Emission Unit	Description	Heat Input (MMBtu/hr)
EP-20	Steam Boilers	6.5
Total Q		6.5

Allowable PM emission limitation for new indirect heating sources at an installation having a total heat input rate of less than 10 MMBtu/hr is 0.40 lbs/MMBtu. [10 CSR 10-5.030(3)(B)1]

Emission Unit	Description	Emission Factor (lbs/MMscf)	Emission Factor (lbs/MMBtu)	Emission Limit (lbs/MMBtu)
EP-20	Steam Boilers	7.6	0.007	0.40

The emission factor was taken from FIRE for Process SCC 10200603. The average heating value of 1,050 Btu/scf for natural gas used to convert the emission factor from lbs/MMscf to lbs/MMBtu was taken from AP-42 Appendix A. The calculations demonstrate that the emission unit has worst-case emissions far below the applicable emission limit while being properly maintained and operated; therefore, no further monitoring or record keeping is required while combusting natural gas. The emission unit is in compliance with the emission limit without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

Attachment H

EP-19 Batch Mixing Rooms Capacity Tracking Sheet

Date:

EP-19a Batch Mixing Room #1	
Tank Description	**Tank Size (gallons)[1]**
EP-19a Batch Mixing Room #1 Total Tank Capacity (gallons)[2]:	

[1]The permittee is in compliance with Permit Condition 003 if no tank within EP-19a Batch Mixing Room #1 is larger than 19,812 gallons.

[2]The permittee is in compliance with Permit Condition 003 if EP-19a Batch Mixing Room #1's total tank capacity is less than 50,000 gallons.

EP-19b Batch Mixing Room #2	
Tank Description	**Tank Size (gallons)[3]**
EP-19b Batch Mixing Room #2 Total Tank Capacity (gallons)[4]:	

[3]The permittee is in compliance with Permit Condition 003 if no tank within EP-19b Batch Mixing Room #2 is larger than 19,812 gallons.

[4]The permittee is in compliance with Permit Condition 003 if EP-19b Batch Mixing Room #2's total tank capacity is less than 50,000 gallons.

STATEMENT OF BASIS

Voluntary Limitations
In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid Part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a Part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a Part 70 operating permit.

Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Intermediate Operating Permit Application, received February 14, 2011
2) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
3) U.S. EPA's Factor Information Retrieval (FIRE) Date System 6.25
4) Construction Permit 042010-017, Issued April 28, 2010

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-5.220 *Control of Petroleum Liquid Storage, Loading, and Transfer* is not applicable to the installation and has not been applied within this permit. The installation does not meet the applicablity requirements of 10 CSR 10-5.220(3)(A)1 as the installation does not contain any storage tanks with a capacity of 40,000 gallons or more. The installation is restricted from storing any substance with a vapor pressure in excess of 3.906 psi at 90^{o}F (Hexane is the most volatile substance allowed) within their storage tanks; thus, gasoline with a true vapor pressure of at least 6.2 psi at 90^{o}F is not allowed to be stored within the installation's tanks.

10 CSR 10-5.390 *Control of Emissions From Manufcature of Paints, Varnishes, Lacquers, Enamels, and Other Allied Surface Coating Products* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to installations which have the uncontrolled potential to emit 250 kg/day or 100 tons/year of VOCs from the manufacture of paints, varnishes, lacquers, enamels, and other allied surface coating products. The installation does not manufacture paints, varnishes, lacquers, enamels, or other allied surface coating products; the installation receives these products preblended and places them in aerosol cans (i.e. fills and gasses the cans).

10 CSR 10-5.420 *Control of Equipment Leaks From Synthetic Organic Chemical and Polymer Manufacturing Plants* is not applicable to the installation and has not been applied within this permit. The installation does not meet the applicability requirements of 10 CSR 10-5.420(2)(B) as they do not produce as an intermediate or final product any of the chemicals listed within 40 CFR Part 60,

Subpart VV. The installation does handle acetone, methylene chloride, xylene, methanol, hexane, tetrachloroethylene, trichloroethylene, and toluene; however, none of these chemicals are produced on site, instead the chemicals are purchased elsewhere and transferred to the installation.

10 CSR 10-5.500 *Control of Emissions From Volatile Organic Liquid Storage* is not applicable to the installation and has not been applied within this permit. The installation does not meet the applicability requirements of 10 CSR 10-5.500(1)(B) as the installation does not operate any storage tanks with a capacity equal to or exceeding 40,000 gallons.

10 CSR 10-5.520 *Control of Volatile Organic Compound Emissions From Existing Major Sources* is not applicable to the installation and has not been applied within this permit. The installation does not meet the applicability requirements of 10 CSR 10-5.520(1) as the installation is not an existing source. 10 CSR 10-6.020(2)(E)11 defines existing for Franklin County as installed on or prior to January 18, 1972. The installation did not begin operations until 2011.

10 CSR 10-5.540 *Control of Emissions From Batch Process Operations* is not applicable to the installation and has not been applied within this permit. The installation does not meet the applicability requirements of 10 CSR 10-5.540(1)(B) as the installation does not operate a batch process operation which emits 100 tons/yr or more of VOC. The installation does perform batch blending process operations within Batch Mixing Rooms #1 and #2 (EP-19a and EP-19b); however, the entire installation is subject to a 100 tons/yr VOC limitation.

10 CSR 10-5.570 *Control of Sulfur Emissions From Stationary Boilers* is not applicable to the installation and has not been applied within this permit. The installation does not meet the applicability requirements of 10 CSR 10-5.570(A) as the installation does not operate any boiler with a nameplate capacity greater than 50 MMBtu/hr.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. The only sulfur emitting source at the installation is EP-20 Steam Boilers; however, this source is exempt from this regulation as it exclusively combusts pipeline grade natural gas. [10 CSR 10-6.260(1)(A)2]

Construction Permits

Construction Permit 042010-017, Issued April 28, 2010:

- This construction permit is for the installation of a new facility consisting of:

Emission Unit	Description
EP-01 thru EP-16	(16) 9,000 Gallon Chemical Bulk Storage Above Ground Tanks
EP-17	Losses From Gassing Aerosol Cans
EP-18	Coding Ink For Cans And Boxes
EP-19	(2) Batch Mixing Rooms each with total capacity of 50,000 gallons
EP-20	6.5 MMBtu/hr Natural Gas Fired Steam Boilers
EP-21	Silk Screen Printing

- Special Conditions 1 and 3 were applied within Permit Condition PW001.
- Special Condition 2 was applied within Permit Condition 002.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts D, Da, Db, and Dc – *Standards of Performance for Steam Generating Units* are not applicable to the installation and have not been applied within this permit. Subparts D and Da are only applicable to steam generating units with a heat input rate greater than 250 MMBtu/hr. [§60.40(a) and §60.40a(a)] Subpart Db is only applicable to steam generating units with a heat input rate greater than 100 MMBtu/hr. [§60.40b(a)] Subpart Dc is only applicable to steam generating units with a heat input rate greater than 10 MMBtu/hr. [§60.40c(a)] EP-20 Steam Boilers is the installation's only steam generating unit with a total heat input of 6.5 MMBtu/hr.

40 CFR Part 60, Subparts K, Ka, and Kb – *Standards of Performance for Storage Vessels* are not applicable to the installation and have not been applied within this permit. Subparts K and Ka are only applicable to storage vessels greater than 40,000 gallons in capacity. [§60.110(a) and §60.110a(a)] Subpart Kb is only applicable to storage vessels greater than 75 m^3 in capacity. [§60.110b(a)] All of the chemical bulk storage tanks at the installation (EP-01 thru EP-16) have capacities less than 75 m^3 (19,182 gallons). All of the mixing tanks/vats within EP-19a Batch Mixing Room #1 and EP-19b Batch Mixing Room #2 are restricted to 19,812 gallons or less (see Permit Condition 003).

40 CFR Part 60, Subparts VV and VVa – *Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry* are not applicable to the installation and have not been applied within this permit. The installation does not produce as an intermediate or final product any of the chemicals listed within §60.489. [§60.480(a) and §60.480a(a)] The installation does handle acetone, methylene chloride, xylene, methanol, hexane, tetrachloroethylene, trichloroethylene, and toluene; however, none of these chemicals are produced on site, instead the chemicals are purchased elsewhere and transferred to the installation.

40 CFR Part 60, Subpart NNN – *Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations* is not applicable to the installation and has not been applied within this permit. The installation does not produce as product, co-product, by-product, or intermediate any of the chemicals listed within §60.667. [§60.660(a)] The installation does handle acetone, methylene chloride, xylene, methanol, hexane, tetrachloroethylene, trichloroethylene, and toluene; however, none of these chemicals are produced on site, instead the chemicals are purchased elsewhere and transferred to the installation.

40 CFR Part 60, Subpart RRR – *Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes* is not applicable to the installation and has not been applied within this permit. The installation does not produce as product, co-product, by-product, or intermediate any of the chemicals listed within §60.707. [§60.700(a)] The installation does handle acetone, methylene chloride, xylene, methanol, hexane, tetrachloroethylene, trichloroethylene, and toluene; however, none of these chemicals are produced on site, instead the chemicals are purchased elsewhere and transferred to the installation.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subparts F, G, and H – *National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Manufacturing Industry* are not applicable to the installation and

have not been applied within this permit. The installation does not manufacture as a primary product any of the chemicals listed in Table 1 to Subpart F and is not a major source of Hazardous Air Pollutants (HAPs). [§63.100(b)] The installation does acetone, methylene chloride, xylene, methanol, hexane, tetrachloroethylene, trichloroethylene, and toluene; however, none of these chemicals are produced on site, instead the chemicals are purchased elsewhere and transferred to the installation.

40 CFR Part 63, Subpart I – *National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks* is not applicable to the installation and has not been applied within this permit. The installation is not a major source and does not possess any of the listed production processes. [§63.190(b)] The installation does handle acetone, methylene chloride, xylene, methanol, hexane, tetrachloroethylene, trichloroethylene, and toluene; however, neither of these chemicals are produced on site, instead the chemicals are purchased elsewhere and transferred to the installation.

40 CFR Part 63, Subpart EEEE – *National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)* is not applicable to the installation and has not been applied within this permit. The installation is not a major source of Hazardous Air Pollutants (HAPs) distributing organic liquids. [§63.2334(a)] The installation is a synthetic minor source of Hazardous Air Pollutants (see Permit Condition PW002).

40 CFR Part 63, Subpart FFFF – *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing* is not applicable to the installation and has not been applied within this permit. The installation is not a major source of Hazardous Air Pollutants (HAPs) operating a chemical manufacturing process unit. [§63.2435(a)] The installation is a synthetic minor source of Hazardous Air Pollutants (see Permit Condition PW002).

40 CFR Part 63, Subpart HHHHH – *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing* is not applicable to the installation and has not been applied within this permit. The installation does not blend materials to produce paint. The installation receives all of its paints and allied products preblended. [§63.7985(a)]

40 CFR Part 63, Subpart VVVVVV – *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources* is applicable to the installation and has been applied within this permit (see Permit Conditions PW003). This regulation is applicable to chemical manufacturing process units (CMPU) using or producing one of the HAPs listed in Table 1 to Subpart VVVVVV at an area source. [§63.11494(a)] The only chemical on Table 1 which the installation uses is methylene chloride.(75-09-2). The installation does operate a CMPU as §63.11502(b) defines process vessel as "each vessel, except hand-held containers, used in the processing of raw materials to chemical products. Examples include, but are not limited to reactors, distillation units, centrifuges, mixing vessels, and process tanks."

40 CFR Part 63, Subpart BBBBBBB – *National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry* is not applicable to the installation and has not been applied within this permit. The installation is an area source of HAPs; however, the installation does not handle any of the target HAPs – metal compounds of chromium, lead, manganese, and/or nickel. [§63.11579(a) and §63.11588]

40 CFR Part 63, Subpart CCCCCCC – *National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to paints and allied products manufacturing at area source which process, use, or generate materials containing benzene, methylene chloride, cadmium compounds, chromium compounds, lead compounds and/or nickel compounds. [§63.11599(a)] The only listed chemical which the installation uses is methylene chloride.(75-09-2). The permittee does not perform paints and allied products manufacturing. The installation receives all of its paints and allied products preblended. None of the paints and allied products canned at the installation contain methylene chloride. The methylene chloride used by the installation is found in their non-paint products.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*
The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Greenhouse Gas Emissions

On May 13, 2010 EPA issued the GHG Tailoring Rule which set the major source threshold for CO_2e to be 100,000 tons/yr within 40 CFR Part 70. As of July 1, 2011 all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO_2e) for this installation are calculated to be 3,424.33 tons, classifying the installation as a minor source of GHGs. Please note that the potential emissions of greenhouse gases from this installation are only for stationary sources as §70.2 defines emission unit as “any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act.”

Other Regulatory Determinations

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyone the Premises of Origin* is applicable to the installation, but has not been applied within this permit. The installation’s potential emissions of particulate matter were calculated to be 0.22 tons/yr (0.05 lbs/hr). As the installation’s potential emissions of particulate matter are quite low, the installation is assumed to always be in compliance with this regulation while being properly maintained and operated; therefore, no further monitoring, record keeping, or reporting is required at this time.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit. The installation does have visible air emissions sources; however, the installation has potential emissions of particulate matter of 0.22 tons/yr (0.05 lbs/hr) and is not expected to exceed the opacity limit while being properly maintained and operating.. No further monitoring, record keeping, or reporting is required at this time.

An updated potential to emit for the installation is provided in the following table:

Pollutant	Potential to Emit (tons/year)[1]
CO	2.39
CO_2e	3,424.33
NH_3	0.09
NO_x	2.85
PM_{10}	0.22
$PM_{2.5}$	0.22
SO_x	0.02
VOC	140.45
HAP	39.16
Hexane (110-54-3)	37.00
Trichloroethylene (79-01-6)	23.99
Methanol (67-56-1)	10.75
Tetrachloroethylene (127-18-4)	7.62
Toluene (108-88-3)	6.94
Xylene (1330-20-7)	2.12
Glycol Ethers (20-10-0)	2.11
Dichloromethane (75-09-2)	1.06
Ethylene Glycol (107-21-1)	0.44
Formaldehyde (50-00-0)	0.05

[1]Each emission source was evaluted at 8,760 hours of uncontrolled annual operation unless otherwise noted:

- The breathing losses from batch mixing tanks within EP-19a Batchin Mixing Room #1 were evaluated based upon the 50,000 gallon maximum capacity limitation within Permit Condition 003.
- The breathing losses from batch mixing tanks within EP-19b Batchin Mixing Room #2 were evaluated based upon the 50,000 gallon maximum capacity limitation within Permit Condition 003.
- Hexane was assumed as the worst case VOC and HAP for all chemical bulk storage tanks. Dichloromethane was not considered as the worst case as it is not stored in bulk at the installation, but is received within totes.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

1) The specific pollutant regulated by that rule is not emitted by the installation.
2) The installation is not in the source category regulated by that rule.
3) The installation is not in the county or specific area that is regulated under the authority of that rule.
4) The installation does not contain the type of emission unit which is regulated by that rule.
5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
Environmental Engineer

CERTIFIED MAIL: 70093410000190188780
RETURN RECEIPT REQUESTED

Mr. Gary L. Myers
Plaze, Inc. - Pacific
105 Bolte Ln.
St. Clair, MO 63077-3219

Re: Plaze, Inc. - Pacific, 071-0230
Permit Number: **OP2011-052**

Dear Mr. Myers:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS/ark

Enclosures

c: St. Louis Regional Office
PAMS File: 2011-02-024