



## PART 70 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 herein.

**Operating Permit Number:** OP2011-038  
**Expiration Date:** AUG 11 2016  
**Installation ID:** 071-0157  
**Project Number:** 2010-11-034

**Installation Name and Address**

Plaze, Inc.  
105 Bolte Lane  
St. Clair, MO 63077-3219  
Franklin County

**Parent Company's Name and Address**

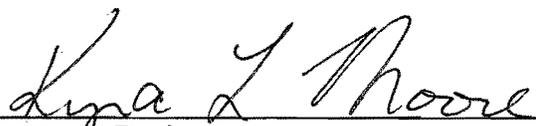
Plaze, Inc.  
105 Bolte Lane  
St. Clair, MO 63077-3219

**Installation Description:**

Plaze, Inc. is a custom aerosol can packager located in St. Clair. Some chemicals are blended onsite while other chemicals are received preblended. Aerosol cans are filled with the blended chemicals on one of the installation's eight fill lines prior to being sent to a gassing house for pressurization. The installation is a major source of Volatile Organic Compounds (VOCs) and a synthetic minor source of Hazardous Air Pollutants (HAPs).

AUG 12 2011

Effective Date

  
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Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Plaze, Inc. is a custom aerosol can packager located in St. Clair. Some chemicals are blended onsite while other chemicals are received preblended. Aerosol cans are filled with the blended chemicals on one of the installation's eight fill lines prior to being sent to a gassing house for pressurization. The installation is a major source of Volatile Organic Compounds (VOCs) and a synthetic minor source of Hazardous Air Pollutants (HAPs).

<b>Reported Air Pollutant Emissions, tons per year</b>					
<b>Pollutant</b>	<b>2010</b>	<b>2009</b>	<b>2008</b>	<b>2007</b>	<b>2006</b>
Particulate Matter $\leq$ Ten Microns (PM <sub>10</sub> )	-	-	0.05	0.03	0.01
Sulfur Oxides (SO <sub>x</sub> )	-	-	0.01	0.01	0.003
Nitrogen Oxides (NO <sub>x</sub> )	-	-	1.67	0.86	0.41
Volatile Organic Compounds (VOC)	46.60	41.37	44.87	46.89	42.34
Carbon Monoxide (CO)	-	-	0.35	0.18	0.09
Hazardous Air Pollutants (HAPs)	0.15	0.04	0.63	0.23	0.44
N-Hexane (110-54-3)	0.08	0.04	0.55	0.15	0.36
Dichloromethane (75-09-2)	0.06	0.001	0.08	0.08	0.07
Methanol (67-56-1)	0.004	-	0.004	-	0.01

### EMISSION UNITS WITH LIMITATIONS

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

<b>Building No. 1</b>	
<b>Emission Unit</b>	<b>Description</b>
EP01	Batch Mixing Room #1
EP02	Losses From Charging Aerosol Cans
EP03	Can And Box Coding Inks
EP04	Hot Water Boilers
EP05	6,200 gallon Chemical Bulk Storage Tank
EP06	2,800 gallon Chemical Bulk Storage Tank
EP07	6,700 gallon Chemical Bulk Storage Tank
EP08	6,300 gallon Chemical Bulk Storage Tank
EP09	6,300 gallon Chemical Bulk Storage Tank
EP10	6,300 gallon Chemical Bulk Storage Tank
EP11	9,000 gallon Chemical Bulk Storage Tank
EP12	9,000 gallon Chemical Bulk Storage Tank

<b>Building No. 5</b>	
<b>Emission Unit</b>	<b>Description</b>
EP13	Batch Mixing Room #2
EP14	Losses From Gassing Aerosol Cans
EP15	Date Coders For Cans And Boxes
EP16	Hot Water Boilers
EP17	12,000 gallon Chemical Bulk Storage Tank
EP18	12,000 gallon Chemical Bulk Storage Tank
EP19	12,000 gallon Chemical Bulk Storage Tank
EP20	12,000 gallon Chemical Bulk Storage Tank

<b>Emission Unit</b>	<b>Description</b>
EP21	9,000 gallon Chemical Bulk Storage Tank
EP22	9,000 gallon Chemical Bulk Storage Tank
EP23	9,000 gallon Chemical Bulk Storage Tank
EP24	9,000 gallon Chemical Bulk Storage Tank

## 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 as of the date that this permit is issued.

### **PERMIT CONDITION PW001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit No. 1095-004, Issued August 25, 1995

#### **Operational Limitation:**

Special Condition 4: If in the opinion of the Director, a continuing situation of demonstrated nuisance odors exists for the neighbors of the facility, the Director may require the permittee to submit a corrective action plan adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation 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 (10) 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 (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.

#### **Monitoring/Recordkeeping:**

1. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAP using Attachments E1, E2, F1, and F2 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. 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 (10) days after the end of the month during which records indicate an exceedance of either of the HAP emission limitation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-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<sup>1</sup>

<sup>1</sup>This regulation is applicable to the installation's non-paint CMPUs. The compliance date for existing sources is October 29, 2012. [§63.11494(f)]

**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 pounds per year (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 pounds per year (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*

As required in §63.11496, the permittee shall comply with the requirements for batch process vents in the following table.

Emission Source	Requirements	Exceptions
Batch process vents in a CMPU at an existing 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 $\geq 85$ percent by weight or to $\leq 20$ 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 85 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:**

- 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, recordkeeping, 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 this subpart VVVVVV constitutes compliance with this Subpart VVVVVV. [§63.11500(a)]

**Notifications, Recordkeeping, 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, recordkeeping, and reporting requirements, in this Subpart VVVVVV. [§63.11501(b)(5)]
3. *Recordkeeping.* 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 recordkeeping 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, recordkeeping, and reporting requirements of this permit condition in the semi-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**

As required in §63.11501(a), the permittee shall comply with the requirements of the NESHAP General Provisions (40 CFR Part 63, Subpart A) as shown in the following table:

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) <sup>1</sup>	Yes
63.8(c)(6)-(8); (d); (e); (f)(6) <sup>2</sup>	Yes
63.8(g)(1)-(4) <sup>3</sup>	Yes
Notification Requirements 63.9(a); (b)(1)-(2), (4)-(5); (c)-(e); (i)	Yes
63.9(g) <sup>4</sup>	Yes
63.9(h)(1)-(3), (5)-(6) <sup>5</sup>	Yes
Change in Information Already Provided 63.9(j) <sup>6</sup>	No
Recordkeeping Requirements 63.10(a)	Yes
63.10(b)(1)	Yes
63.10(b)(2)(i)-(v) <sup>7</sup>	Yes
63.10(b)(2)(vi), (x), (xi), (xiii) <sup>8</sup>	Yes
63.10(b)(2)(vii)-(ix), (xii), (xiv)	Yes
63.10(b)(3)	Yes
63.10(c)(1), (5)-(6), (13)-(14) <sup>8</sup>	Yes
63.10(c)(7)-(8), (10)-(12), (15) <sup>7</sup>	Yes
Reporting Requirements 63.10(d)(1)-(2), (4); (e)(1)-(2); (f)	Yes
63.10(e)(1)-(2) <sup>8</sup>	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

<sup>1</sup> References to SSM in §63.8(c) do not apply.

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> Additional notification requirement applies only if the permittee uses a CEMS to demonstrate compliance with alternative standard in §63.11496(e).

<sup>5</sup> Except subpart VVVVVV does not contain opacity or VE limits.

<sup>6</sup> Notification of process changes that affect a compliance determination are required in §63.11501(d)(4).

<sup>7</sup> Any references to SSM do not apply.

<sup>8</sup> 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 as of the date that this permit is issued.

<b>PERMIT CONDITION 001</b>			
<b>EP04 and EP16</b>			
10 CSR 10-5.030 Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating			
<b>Emission Unit</b>	<b>Description</b>	<b>Fuel</b>	<b>Heat Input (MMBtu/hr)</b>
EP04	Hot Water Boilers	Natural Gas	3.3
EP16	Hot Water Boilers	Natural Gas	1.495

**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/Recordkeeping:**

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

**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 (10) 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/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
<b>Building No. 1</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit No. 0596-032, Issued April 17, 1996	
<b>Building No. 1</b>	
<b>Emission Unit</b>	<b>Description</b>
EP01	Batch Mixing Room #1
EP02	Losses From Charging Aerosol Cans
EP03	Can And Box Coding Inks
EP04	Hot Water Boilers
EP05	6,200 gallon Chemical Bulk Storage Tank
EP06	2,800 gallon Chemical Bulk Storage Tank
EP07	6,700 gallon Chemical Bulk Storage Tank
EP08	6,300 gallon Chemical Bulk Storage Tank
EP09	6,300 gallon Chemical Bulk Storage Tank
EP10	6,300 gallon Chemical Bulk Storage Tank
EP11	9,000 gallon Chemical Bulk Storage Tank
EP12	9,000 gallon Chemical Bulk Storage Tank

**Emission Limitation:**

Special Condition 1: Emissions of volatile organic compounds (VOCs) from Building No. 1 shall be less than 100 tons in any consecutive 12-month period.

**Operational Limitation:**

Special Condition 5: The permittee shall provide and maintain suitable, easily read, permanent markings on each tank/mixing vat located within Building No. 1. Failure to do so is a violation of this permit.

**Monitoring/Recordkeeping:**

1. Special Condition 2: Monthly records shall be kept that are adequate to determine the emissions of VOC from this facility. These records shall also indicate the total quantity of VOC emissions over the previous 12-month period. The most recent 60-months of records shall be maintained on-site and shall be made immediately available to Department of Natural Resources' personnel upon request. Attachments C1 and C2 or equivalent forms generated by the permittee may be used.
2. Records may be kept in either written or electronic form.

**Reporting:**

1. Special Condition 3: The permittee shall submit a copy of reports that demonstrate noncompliance with the 100 tons VOC emission limitation to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten (10) days after the end of the month during which records document an exceedance has occurred.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>	
<b>Building No. 5</b>	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 0498-018E, Issued November 15, 2005	
<b>Building No. 5</b>	
<b>Emission Unit</b>	<b>Description</b>
EP13	Batch Mixing Room #2
EP14	Losses From Gassing Aerosol Cans
EP15	Date Coders For Cans And Boxes
EP16	Hot Water Boilers
EP17	12,000 gallon Chemical Bulk Storage Tank
EP18	12,000 gallon Chemical Bulk Storage Tank
EP19	12,000 gallon Chemical Bulk Storage Tank
EP20	12,000 gallon Chemical Bulk Storage Tank

**Emission Limitation:**

Special Condition 1: The permittee shall not emit volatile organic compounds (VOCs) from Building No. 5 in excess of 40 tons during any consecutive 12-month period.

**Monitoring/Recordkeeping:**

- Special Condition 2: The permittee shall record the monthly and the sum of the most recent consecutive 12-month VOC emissions in tons from Building No. 5 to demonstrate compliance. These records shall be kept on-site for five years and shall be made immediately available for inspection to Departments of Natural Resources' personnel upon request. Attachment D or an equivalent form generated by the permittee may be used.
- Records may be kept in either written or electronic form.

**Reporting:**

- Special Condition 3: 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 (10) days after the end of the month during which records indicate an exceedance of the 40 ton VOC emission limitation has occurred.
- The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 004</b>	
<b>EP01 Batch Mixing Room #1</b>	
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	
<b>Emission Unit</b>	<b>Description</b>
EP01	Batch Mixing Room #1

**Operational Limitations:**

- The total capacity of EP01 Batch Mixing Room #1 shall not exceed 50,000 gallons.
- EP01 Batch Mixing Room #1 shall not contain any tank in excess of 19,812 gallons.

**Monitoring/Recordkeeping:**

1. The permittee shall track the total capacity of EP01 Batch Mixing Room #1 using Attachment G or an equivalent form generated by the permittee. The permittee shall revise Attachment G with each addition and removal of a tank from EP01 Batch Mixing Room #1.
2. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all VOC and HAP containing materials within EP01 Batch Mixing Room #1.
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 (10) days after records indicate either of the operational limitations has been exceeded.
2. The permittee shall report any deviations from the operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 005</b> <b>EP13 Batch Mixing Room #2</b> 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	
Emission Unit	Description
EP13	Batch Mixing Room #2

**Operational Limitations:**

1. The total capacity of EP13 Batch Mixing Room #2 shall not exceed 40,000 gallons.
2. EP01 Batch Mixing Room #1 shall not contain any tank in excess of 19,812 gallons.

**Monitoring/Recordkeeping:**

1. The permittee shall track the total capacity of EP13 Batch Mixing Room #2 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 EP13 Batch Mixing Room #2.
2. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all VOC and HAP containing materials within EP13 Batch Mixing Room #2.
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 (10) days after records indicate either of the operational limitations has been exceeded.
2. The permittee shall report any deviations from the operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 006</b>			
<b>Chemical Bulk Storage Tanks</b>			
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)			
Emission Unit	Description	Emission Unit	Description
EP05	6,200 gallon Chemical Bulk Storage Tank	EP17	(4) 12,000 gallon Chemical Bulk Storage Tanks
EP06	2,800 gallon Chemical Bulk Storage Tank	EP18	
EP07	6,700 gallon Chemical Bulk Storage Tank	EP19	
EP08	(3) 6,300 gallon Chemical Bulk Storage Tanks	EP20	
EP09		EP21	(4) 9,000 gallon Chemical Bulk Storage Tanks
EP10		EP22	
EP11	(2) 9,000 gallon Chemical Bulk Storage Tanks	EP23	
EP12		EP24	

**Operational Limitations:**

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°F.

**Monitoring/Recordkeeping:**

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 (5) 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 limitations, monitoring/recordkeeping and reporting requirements of this permit condition in the semi-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 regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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 as of the date that this permit is issued. 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 exceptions:
    - i) St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - b) Yard waste, with the following exceptions:
    - 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. 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. 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 Recordkeeping. 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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(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 paper EIQ to the Air Pollution Control Program by no later than April 1<sup>st</sup> after the end of each reporting year. The permittee may instead submit a full electronic EIQ via MoEIS by no later than May 1<sup>st</sup> after the end of each reporting year.
- 5) Emission fees are due by no later than June 1<sup>st</sup> after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 6) 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.
- 7) 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 10-5.120 Information on Sales of Fuels to be Provided and Maintained**

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

### **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 these 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 recordkeeping 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(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(6)(C)1.C General Recordkeeping and Reporting Requirements**

- 1) Recordkeeping
  - 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) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi-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, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - 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.A 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 semi-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(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(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

#### **10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

#### **10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

The installation is permitted to change out tanks within each batch mixing room (EP01 and EP13) 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 EP01 Batch Mixing Room #1 shall not exceed 50,000 gallons.
- 3) The total capacity of EP13 Batch Mixing Room #2 shall not exceed 40,000 gallons.
- 4) 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, 100 ton Building No. 1 VOC limit, and 40 ton Building No. 5 VOC limit.
- 5) 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 CCCCCC.

#### **10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The application requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(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(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify 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, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;

- 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 notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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.
- 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; and
- d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Mr. Gary L. Myers, Safety and Regulatory Director. 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(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;  
or
- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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**10 CSR 10-6.065(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 B**  
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)
EP04	Hot Water Boiler	3.3
EP16	Hot Water Boiler	1.495
<b>Total Q</b>		4.795

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)	Is the Emission unit in compliance?
EP04	Hot Water	7.6	0.007	0.40	YES
EP16	Boilers	7.6	0.007	0.40	YES

Emission factors were taken from FIRE for Process SCC 10200603. The average heating value of 1,050 Btu/scf for natural gas was taken from AP-42 Appendix A. The calculations demonstrate that each emission unit has worst-case emissions far below the applicable emission limit while being properly maintained and operated; therefore, no further monitoring or recordkeeping is required while combusting natural gas. The emission units are 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 C1**  
Building No. 1 VOC Tracking Sheet

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) <sup>1</sup>	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons) <sup>2</sup>	VOC Emissions (lbs/month)
EP01	Batch Mixing Room #1				
EP05	Chemical Bulk Storage Tanks				
EP06					
EP07					
EP08					
EP09					
EP10					
EP11					
EP12					
			<b>(cans)</b>	<b>(lbs/can)</b>	<b>(lbs/month)</b>
EP02	Losses From Charging Aerosol Cans			0.0012	
			<b>(tons)</b>	<b>(lbs/ton)</b>	<b>(lbs/month)</b>
EP03	Can And Box Coding Inks			2000	
			<b>(MMscf)</b>	<b>(lbs/MMscf)</b>	<b>(lbs/month)</b>
EP04	Hot Water Boiler			5.5	
<b>VOC Emissions (lbs/month):</b>					

<sup>1</sup>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.

<sup>2</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

Tank Standing Losses					
Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) <sup>1</sup>	Tank Capacity (1000 gallons)	Emission Factor (lbs/1000 gallons-years) <sup>1</sup>	VOC Emissions (tons/year)
EP01	Batch Mixing Room #1		50 <sup>3</sup>		
EP05	Chemical Bulk Storage Tanks		6.2		
EP06			2.8		
EP07			6.7		
EP08			6.3		
EP09			6.3		
EP10			6.3		
EP11			9		
EP12			9		
<b>Building No. 1 Tank Standing Losses (tons/year):</b>					

<sup>1</sup>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.

<sup>2</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

<sup>3</sup>EP01 Batching Mixing Room #1 contains many small tanks, but is limited to a maximum total tank capacity of 50,000 gallons by Permit Condition 004.



**Attachment D**  
Building No. 5 VOC Tracking Sheet

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) <sup>1</sup>	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons) <sup>2</sup>	VOC Emissions (lbs/month)
EP13	Batch Mixing Room #2				
EP17	Chemical Bulk Storage Tanks				
EP18					
EP19					
EP20					
			<b>(cans)</b>	<b>(lbs/can)</b>	<b>(lbs/month)</b>
EP14	Losses From Gassing Aerosol Cans			0.0012	
			<b>(tons)</b>	<b>(lbs/ton)</b>	<b>(lbs/month)</b>
EP15	Date Coders For Cans And Boxes			2000	
			<b>(MMscf)</b>	<b>(lbs/MMscf)</b>	<b>(lbs/month)</b>
EP16	Hot Water Boiler			5.5	
<b>VOC Emissions (lbs/month):</b>					

<sup>1</sup>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.

<sup>2</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

Tank Standing Losses					
Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) <sup>1</sup>	Tank Capacity (1000 gallons)	Emission Factor (lbs/1000 gallons-years) <sup>2</sup>	VOC Emissions (tons/year)
EP13	Batch Mixing Room #2		40 <sup>3</sup>		
EP17	Chemical Bulk Storage Tanks		12		
EP18			12		
EP19			12		
EP20			12		
<b>Building No. 5 Tank Standing Losses (tons/year):</b>					

<sup>1</sup>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.

<sup>2</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

<sup>3</sup>EP13 Batching Mixing Room #2 contains many small tanks, but is limited to a maximum total tank capacity of 40,000 gallons by Permit Condition 005.

Month and Year	Annual VOC Emissions (tons/year) <sup>1</sup>

Month and Year	Annual VOC Emissions (tons/year) <sup>1</sup>

<sup>1</sup>Annual VOC Emissions (tons/year) =

$$\text{Building No. 5 Tank Standing Losses (tons/year)} + \frac{\text{the sum of the most recent 12 VOC Emissions (lbs/month)}}{2000 \text{ (lbs/ton)}}$$

The permittee is in compliance with Permit Condition 003 if annual VOC emissions from Building No. 5 are less than 40 tons/year.

**Attachment E1**  
 Plantwide Combined HAP Tracking Sheet

<b>Emission Unit</b>	<b>Description</b>	<b>Chemical Stored/Used (Name and CAS No.)<sup>1</sup></b>	<b>Monthly Usage (1000 gallons)</b>	<b>Emission Factor (lbs/1000 gallons)<sup>2</sup></b>	<b>HAP Emissions (lbs/month)</b>
EP01	Batch Mixing Room #1				
EP05	Chemical Bulk Storage Tanks				
EP06					
EP07					
EP08					
EP09					
EP10					
EP11					
EP12					
EP13	Batch Mixing Room #2				
EP17	Chemical Bulk Storage Tanks				
EP18					
EP19					
EP20					
EP21					
EP22					
EP23					
EP24					
<b>Emission Unit</b>	<b>Description</b>		<b>Monthly Usage (MMscf)</b>	<b>Emission Factor (lbs/MMscf)</b>	<b>HAP Emissions (lbs/month)</b>
EP04 and EP16	Hot Water Boilers			1.9	
<b>HAP Emissions (lbs/month):</b>					

<sup>1</sup>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.

<sup>2</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.



**Attachment F1**  
 Plantwide Individual HAP Tracking Sheet

HAP Name:

HAP CAS No.:

<b>Emission Unit</b>	<b>Description</b>	<b>Monthly Usage (1000 gallons)</b>	<b>Emission Factor (lbs/1000 gallons)<sup>1</sup></b>	<b>HAP Emissions (lbs/month)</b>
EP01	Batch Mixing Room #1			
EP05	Chemical Bulk Storage Tanks			
EP06				
EP07				
EP08				
EP09				
EP10				
EP11				
EP12				
EP13	Batch Mixing Room #2			
EP17	Chemical Bulk Storage Tanks			
EP18				
EP19				
EP20				
EP21				
EP22				
EP23				
EP24				
		<b>(MMscf)</b>	<b>(lbs/MMscf)<sup>2</sup></b>	<b>(lbs/month)</b>
EP04 and EP16	Hot Water Boilers			
<b>HAP Emissions (lbs/month):</b>				

<sup>1</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0. If the tank(s) for the listed emission point do not contain the listed HAP, the emission factor shall be 0.

<sup>2</sup>The Hot Water Boilers emission factor shall be 1.8 lbs/MMscf for Hexane (110-54-3) and shall be ~0 for all other HAPs.







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## STATEMENT OF BASIS

### 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) Part 70 Operating Permit Application, received November 8, 2010
- 2) 2009 Emissions Inventory Questionnaire
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) U.S. EPA's Factor Information Retrieval (FIRE) Date System 6.25
- 5) Construction Permit No. 1095-004, Issued August 25, 1995
- 6) Construction Permit No. 0596-032, Issued April 17, 1996
- 7) Construction Permit No. 0498-018, Issued April 4, 1998
- 8) Construction Permit No. 0498-018A, Issued June 10, 1998
- 9) Construction Permit No. 0498-018A Extension, Issued April 21, 2000
- 10) Construction Permit No. 0498-018B, Issued April 29, 2002
- 11) Construction Permit No. 0498-018C, Issued March 4, 2004
- 12) Construction Permit No. 0498-018C Extension, Issued April 22, 2004
- 13) Construction Permit No. 0498-018D, Issued September 6, 2005
- 14) Construction Permit No. 0498-018E, Issued November 15, 2005
- 15) No Construction Permit Required Determination, Issued March 7, 2002
- 16) No Construction Permit Required Determination, Issued January 17, 2007
- 17) No Construction Permit Required Determination, Issued June 10, 2008

### Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be 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 applicability 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°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°F is not allowed to be stored within the installation's tanks.

10 CSR 10-5.390 *Control of Emissions From Manufacture 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, perchloroethylene, mixed xylenes, methanol, hexachloroethane, isopropanol, and ethanol; 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 1986.

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 per year or more of VOC. The installation does perform batch blending process operations within Batch Mixing Rooms #1 and #2 (EP01 and EP13). Building No. 1 (containing EP01 Batch Mixing Room #1) is subject to a 100 tons/year VOC limitation and Building No. 2 (containing EP13 Batch Mixing Room #2) is subject to a 40 tons/year VOC limitation. The definition of batch process train within 10 CSR 10-5.540(2)(D) states that a batch process train which is independent of other processes shall be considered a single batch process train for the purposes of this rule; therefore, each of the batch mixing rooms is a separate single batch process train and as each has potential VOC emissions less than or equal to 100 tons/year of VOC neither of the batch mixing rooms meet the applicability requirements.

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 sources at the installation are Hot Water Boilers EP04 and EP16; however, these sources are exempt from this regulation as their exclusively combust pipeline grade natural gas. [10 CSR 10-6.260(1)(A)2]

### **Construction Permits**

Construction Permit No. 1095-004, Issued August 25, 1995:

- This construction permit is for the installation of seven aerosol lines, two liquid lines, eight stainless steel mixing vats, eight can coders, four storage tanks, and five small Hot Water boilers.
- Special Conditions 1 - 3 were not included within this permit. These special conditions limited the entire installation to 99 tons/year of VOC emissions; however, the entire installation was later limited to 100 tons/year of VOC emissions in Construction Permit No. 0596-032.
- Special Condition 4 has been applied within this permit (see Permit Condition PW001).

Construction Permit No. 0596-032, Issued April 17, 1996:

- This construction permit is for the installation of two above ground 6,300 gallon storage tanks and 4 new mixing vats.
- Special Conditions 1-3 have been applied within this permit (see Permit Condition 002). The special conditions were originally worded to limit the entire installation to 100 tons/year of VOC; however, as the writing of the construction permit, the entire installation consisted only of Building No. 1. Building No. 5 was not constructed until later and is not assumed to be under this limit.
- Special Condition 4 is consistent with Special Condition 4 of Construction Permit No. 1095-004 which has been applied within this permit (see Permit Condition PW001).
- Special Condition 5 has been applied within this permit (see Permit Condition 002).

Construction Permit No. 0498-018, Issued April 4, 1998:

Construction Permit No. 0498-018A, Issued June 10, 1998:

Construction Permit No. 0498-018A Extension, Issued April 21, 2000:

Construction Permit No. 0498-018B, Issued April 29, 2002:

Construction Permit No. 0498-018C, Issued March 4, 2004:

Construction Permit No. 0498-018C Extension, Issued April 22, 2004:

Construction Permit No. 0498-018D, Issued September 6, 2005:

Construction Permit No. 0498-018E, Issued November 15, 2005:

- This construction permit is for the installation of four small process boilers, six aerosol/liquid fill lines, five aerosol gas charging houses, six can coders, and four 8,000 gallon storage tanks within Building No. 5.
- Amendment A added two additional aerosol/liquid fill lines, two additional aerosol gas charging houses, two additional can coders, two additional 8,000 gallon storage tanks, and a batch mixing room. Allowance to construct this equipment was extended to April 21, 2002.
- Amendment B extends the equipment construction timeline to April 19, 2004.
- Amendment C increases the allowed storage capacities of four of the storage tanks from 8,000 gallons to 12,000 gallons. In April of 2004, the installation requested an extension of the construction timeline for the equipment; however, the Air Pollution Control Program determined that construction had already commenced as the foundation for Building No. 5 had been poured.
- Amendment D added two additional small process boilers.
- Amendment E is an administrative amendment to correlate emission unit numbering within the construction permit to the installation's last operating permit OP2005-032.
- Special Conditions 1 and 2 have been applied within this permit (see Permit Condition 003).
- Special Conditions 3 and 4 limit the existing process lines at the installation to 100 tons/year of VOC. These special conditions are consistent with Special Conditions 1 and 2 of Construction Permit No. 0596-032 which has been applied within this permit (see Permit Condition 002).
- Special Condition 5 has been applied within this permit (see Permit Condition 003).

No Construction Permit Required Determination, Issued March 7, 2002:

- This no construction permit required determination is for the installation of two 2,000 gallon mixing tanks and one 1,800 gallon mixing tank.

No Construction Permit Required Determination, Issued January 17, 2007:

- This no construction permit required determination is for the installation of an 8,000 gallon hazardous waste storage tank.

No Construction Permit Required Determination, Issued June 10, 2008:

- This no construction permit required determination is for the installation of four 9,000 gallon storage tanks.

### **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)] EP04 Hot Water Boilers is the installation's largest steam generating unit with a total heat input of 3.3 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<sup>3</sup> in capacity. [§60.110b(a)] All of the chemical bulk storage tanks at the installation (EP05 – EP12 and EP17 – EP24) have capacities less than 75 m<sup>3</sup> (19,182 gallons). All of the mixing tanks/vats within EP01 Batch Mixing Room #1 and EP13 Batch Mixing Room #2 are restricted to 19,812 gallons or less (see Permit Conditions 004 and 005).

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, perchloroethylene, mixed xylenes, methanol, hexachloroethane, isopropanol, and ethanol; 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, perchloroethylene, mixed xylenes, methanol, isopropanol, and ethanol; 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, perchloroethylene, mixed xylenes, methanol, isopropanol, and ethanol; 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 handle acetone, hexachloroethane, methylene chloride, perchloroethylene, mixed xylenes, and methanol; 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 methylene chloride and perchloroethylene; 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 blend materials to produce paint; however, the installation is not a major source of Hazardous Air Pollutants. [§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 BBBB BBB – *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 CCCCCC – *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<sub>2</sub>e to be 100,000 tons/year 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<sub>2</sub>e) for this installation are calculated to be 2,460.39 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 Beyond 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 0.15 tons/year (0.04 lbs/hour). 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, recordkeeping, 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 0.15 tons/year (0.04 lbs/hour) and is not expected to exceed the opacity limit while being properly maintained and operating.. No further monitoring, recordkeeping, 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) <sup>1</sup>
CO	1.71
CO <sub>2</sub> e	2460.39
NH <sub>3</sub>	0.37
NO <sub>x</sub>	2.04
PM <sub>10</sub>	0.15
PM <sub>2.5</sub>	0.15
SO <sub>x</sub>	0.01
VOC	146.89
HAP	43.96
Hexane (110-54-3)	43.96
Methanol (67-56-1)	41.38
Xylene (1330-20-7)	23.13
Dichloromethane (75-09-2)	21.60

<sup>1</sup>Each emission source was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted:

- VOC emissions from Building No. 1 were evaluated as 100 tons/year due to Special Condition 1 of Construction Permit No. 0596-032 (see Permit Condition 002).
- VOC emissions from Building No. 5 were evaluated as 40 tons/year due to Special Condition 1 of construction Permit No. 0498-018E (see Permit Condition 003).
- The breathing losses from batch mixing tanks within EP01 Batchin Mixing Room #1 were evaluated based upon the 50,000 gallon maximum capacity limitation within Permit Condition 004.
- The breathing losses from batch mixing tanks within EP13 Batchin Mixing Room #2 were evaluated based upon the 40,000 gallon maximum capacity limitation within Permit Condition 004.
- 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:

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Alana L. Rugen  
Environmental Engineer

CERTIFIED MAIL: 70093410000190188131  
RETURN RECEIPT REQUESTED

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

Re: Plaze, Inc., 071-0157  
Permit Number: **OP2011-038**

Dear Mr. Myers:

Enclosed with this letter is your Part 70 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 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

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: 2010-11-034