



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

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: OP2017-018
Expiration Date: **MAR 13 2022**
Installation ID: 071-0157
Project Number: 2016-02-034

Installation Name and Address

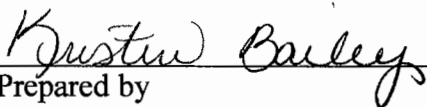
Plaze, Inc.
105 Bolte Lane
St. Clair, MO 63077-3219
Franklin County

Parent Company's Name and Address

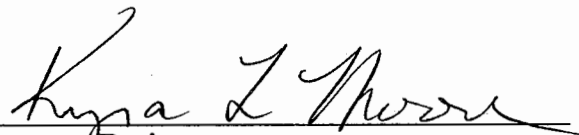
Plaze, Inc.
105 Bolte Lane
St. Clair MO, 63077-3219

Installation Description:

Plaze, Inc. is a full service contract packager that specializes in aerosol packaging, located in St. Clair, Missouri. Some chemicals are blended onsite while other chemicals are received pre-blended. 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) and isn't on the list of named installations found in 10 CSR 10-6.020(3)(B). This is a renewal of the P70 operating permit.



Prepared by
Kristin Bailey
Operating Permit Unit



Director or Designee
Department of Natural Resources

MAR 13 2017

Effective Date

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I. Installation Equipment Listing

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.

Building No. 1 – Group 01	
Emission Unit	Description
EP01	Batch Mixing Room #1
EP02	Losses From Charging Aerosol Cans
EP03	Can And Box Coding Inks
EP04	Five Raypack, Natural Gas, Steam Boilers, 1995
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

Building No. 1 - Group 02	
Emission Unit	Description
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

Building No. 5	
Emission Unit	Description
EP13	Batch Mixing Room #2
EP14	Losses From Gassing Aerosol Cans
EP15	Date Coders For Cans And Boxes
EP16	Four Raypack, Natural Gas, Steam Boilers, 2004
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

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(6)(C) 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 C1, C2, D1, and D2 or equivalent forms generated by the permittee.
- 2) The permittee shall maintain a complete set of Safety Data Sheets (SDS) 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 Compliance/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 PW002

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 Sources¹

¹This regulation is applicable to the installation's non-paint CMPUs. [§63.11494(f)]

Chemical manufacturing operations that process, use, or produce any of the HAPs shown in the following table are subject to subpart VVVVVV.

Type of HAP	Chemical name	CAS No.
1. Organic compounds	a. 1,3-butadiene	106990
	b. 1,3-dichloropropene	542756
	c. Acetaldehyde	75070
	d. Chloroform	67663
	e. Ethylene dichloride	107062
	f. Hexachlorobenzene	118741
	g. Methylene chloride	75092
	h. Quinoline	91225
2. Metal compounds	a. Arsenic compounds	
	b. Cadmium compounds	
	c. Chromium compounds	
	d. Lead compounds	
	e. Manganese compounds	
	f. Nickel compounds	
3. Others	a. Hydrazine	302012

Monitoring/Recordkeeping

- 1) As estimated emissions from organic HAPs, are less than 10,000 pounds per year (lb/yr) the permittee shall retain a record of the number of batches of each process operated per month. [§63.11496(a)(3)]
- 2) If projected emissions of organic HAPs increase to 10,000 lb/yr or more, the permittee shall comply with the requirements listed in 40 CFR Part 63, Subpart VVVVVV, Table 2. [§63.11496(a)]
- 3) The permittee shall retain records documenting the results of all emissions calculations. [§63.11496(a)(3)]
- 4) The permittee shall reevaluate total emissions from batch process vents prior to making any process changes that affect emission calculations. [§63.11496(a)(3)]
- 5) 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)]
- 6) The permittee shall retain all records for at least five years. 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)]

- b) If batch process vent emissions are less than 10,000 lb/yr for a CPMU, 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)]
- 7) Records may be kept in either written or electronic form.
- 8) Records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.

Reporting:

- 1) The Notification of compliance status 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)]
- 2) 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) The permittee shall clearly identify any deviation from the requirements of this subpart. [§63.11501(d)(1)]
 - b) 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) 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) The permittee shall report any changes in the overlapping provisions with which the permittee complies. [§63.11501(d)(6)]
- 3) The permittee shall submit reports to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, to the Kansas City Health Department, Air Quality Program, 2400 Troost Avenue, Suite 3200, Kansas City, MO 64108 and to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102.
- 4) 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.

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.

PERMIT CONDITION 001	
Building No. 1 – Group 01	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 0596-032, Issued April 17, 1996	
Building No. 1	
Emission Unit	Description
EP01	Batch Mixing Room #1
EP02	Losses From Charging Aerosol Cans
EP03	Can And Box Coding Inks
EP04	Five Raypack, Natural Gas, Steam Boilers, 1995
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:

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

Operational Limitation:

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. [Special Condition 5]

Monitoring/Recordkeeping:

- 1) 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.
- 2) Attachments A1 and A2 or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with the Emission Limitation.
- 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.

Reporting:

- 1) 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 Compliance/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. [Special Condition 3]
- 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.

PERMIT CONDITION 002	
Building No. 5	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 0498-018E, Issued November 15, 2005	
Building No. 5	
Emission Unit	Description
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:

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

Monitoring/Recordkeeping:

- 1) 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. [Special Condition 2]
- 2) The permittee shall use Attachment B or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program to demonstrate compliance with the Emission Limitation.
- 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.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/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. [Special Condition 3]
- 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.

PERMIT CONDITION 003 EP01 Batch Mixing Room #1 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(6)(C) Voluntary Limitation(s)	
Emission Unit	Description
EP01	Batch Mixing Room #1

Operational Limitations:

- 1) The permittee shall limit the total capacity of EP01; Batch Mixing Room #1, to less than 50,000 gallons.
- 2) The permittee shall ensure that EP01; Batch Mixing Room #1, shall not contain any tank with a capacity in excess of 19,812 gallons.

Monitoring/Recordkeeping:

- 1) The permittee shall track the total capacity of EP01 Batch Mixing Room #1 using Attachment E or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program.
- 2) The permittee shall revise Attachment E, or equivalent forms, with each addition and removal of a tank from EP01 Batch Mixing Room #1.
- 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.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/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 operational limitations.
- 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.

PERMIT CONDITION 004 EP13 Batch Mixing Room #2 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(6)(C) Voluntary Limitation(s)	
Emission Unit	Description
EP13	Batch Mixing Room #2

Operational Limitations:

- 1) The permittee shall limit the total capacity of EP13; Batch Mixing Room #2, to less than 40,000 gallons.
- 2) The permittee shall ensure that EP13; Batch Mixing Room #2, 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 F or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program.
- 2) The permittee shall revise Attachment F, or equivalent forms, with each addition and removal of a tank from EP13 Batch Mixing Room #2.

- 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.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/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 operational limitations.
- 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.

PERMIT CONDITION 005			
Chemical Bulk Storage Tanks			
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(6)(C) 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	EP23		
EP12	(2) 9,000 gallon Chemical Bulk Storage Tanks	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 Safety Data Sheets (SDS) for all chemicals stored in these bulk storage tanks.
- 3) The permittee shall maintain all records, either electronically or in paper form, 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.

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) 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.

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 submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

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 10-6.250 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.

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.

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

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

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

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

10 CSR 10-5.120 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.

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.

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- b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
 - 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

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 Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and 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, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. 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 semiannual 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 plant wide individual HAP limit, 25 ton plant wide 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.

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 semiannually (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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and 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 applicable 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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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), record keeping, 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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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 APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP 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 APCP 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this

- rule. 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)34 Responsible Official

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

10 CSR 10-6.065(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) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 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) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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 A1
Building No. 1 VOC Tracking Sheet

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) ¹	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons) ^{2,3}	VOC Emissions (lbs/month)
EP01	Batch Mixing Room #1				
EP05	Chemical Bulk Storage Tanks				
EP06					
EP07					
EP08					
EP09					
EP10					
EP11					
EP12					
			(cans)	(lbs/can)	(lbs/month)
EP02	Losses From Charging Aerosol Cans			0.0012	
			(tons)	(lbs/ton)	(lbs/month)
EP03	Can And Box Coding Inks			2000	
			(MMscf)	(lbs/MMscf)	(lbs/month)
EP04	Five Raypack, Natural Gas, Steam Boilers, 1995			5.5	
VOC Emissions (lbs/month):					

¹The 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.

²Tank emission factors shall be obtained from EPA's TANKS 4.0 or mass balance for the chemical stored/used.

³When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation.

⁴Emission factor for EP-04 were taken from AP-42 Section 1.4, for EP-02 and EP-03 they were taken from engineering calculations.

Tank Standing Losses					
Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) ¹	Tank Capacity (1000 gallons)	Emission Factor (lbs/1000 gallons-years) ^{1,4}	VOC Emissions (tons/year)
EP01	Batch Mixing Room #1		50 ³		
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		
Building No. 1 Tank Standing Losses (tons/year):					

¹The 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.

²Tank emission factors shall be obtained from EPA's TANKS 4.0 or mass balance for the chemical stored/used.

³EP01 Batching Mixing Room #1 contains many small tanks, but is limited to a maximum total tank capacity of 50,000 gallons by Permit Condition 003.

⁴When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation.

Attachment B
Building No. 5 – VOC Tracking Sheet

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) ¹	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons) ^{1,2,3}	VOC Emissions (lbs/month)
EP13	Batch Mixing Room #2				
EP17	Chemical Bulk Storage Tanks				
EP18					
EP19					
EP20					
			(cans)	(lbs/can)	(lbs/month)
EP14	Losses From Gassing Aerosol Cans			0.0012	
			(tons)	(lbs/ton)	(lbs/month)
EP15	Date Coders For Cans And Boxes			2000	
			(MMscf)	(lbs/MMscf)	(lbs/month)
EP16	Hot Water Boiler			5.5	
VOC Emissions (lbs/month):					

¹The 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. When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation.

²Tank emission factors shall be obtained from EPA’s TANKS 4.0 or mass balance for the chemical stored/used.

³Emission factor for EP-14 is from the SCC 30188801 and EP-15 is from the SCC Code 40288801. The emission factor for EP-16 was pulled from AP-42 Fifth Edition, Section 1.4.

Tank Standing Losses

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

¹The 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. When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation.

²Tank emission factors shall be obtained from EPA’s TANKS 4.0 or mass balance for the chemical stored/used.

³EP13 Batching Mixing Room #2 contains many small tanks, but is limited to a maximum total tank capacity of 40,000 gallons by Permit Condition 004.

Month and Year	12 Month Rolling Total VOC Emissions (tons/year) ¹

Month and Year	12 Month Rolling Total VOC Emissions (tons/year) ¹

¹12 Month Rolling Total 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 002 if 12 Month Rolling Total VOC emissions from Building No. 5 are less than 40 tons/year.

Attachment C1
Plantwide Combined HAP Tracking Sheet

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.)¹	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)^{2,3}	HAP Emissions (lbs/month)
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					
Emission Unit	Description		Monthly Usage (MMscf)	Emission Factor (lbs/MMscf)⁴	HAP Emissions (lbs/month)
EP04 and EP16	Five Natural Gas Steam Boilers & Four Natural Gas Steam Boilers			5.5	
HAP Emissions (lbs/month):					

¹The 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.

²Tank emission factors shall be obtained from EPA's TANKS 4.0 or mass balance for the chemical stored/used.

³When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation.

⁴The emission factor for the Natural Gas Steam Boilers is from AP42 Fifth Addition.

Attachment D1
Plantwide Individual HAP Tracking Sheet

HAP Name:

HAP CAS No.:

Emission Unit	Description	Monthly Usage (1000 gallons)	Emission Factor (lbs/1000 gallons)¹	HAP Emissions (lbs/month)
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				
		(MMscf)	(lbs/MMscf)²	(lbs/month)
EP04 and EP16	Five Natural Gas Steam Boilers & Four Natural Gas Steam Boilers			
HAP Emissions (lbs/month):				

¹Tank emission factors shall be obtained from EPA's TANKS 4.0 or by mass balance. If the tank(s) for the listed emission point do not contain the listed HAP, the emission factor shall be 0. When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation

²The Five Natural Gas Steam Boilers & Four Natural Gas Steam Boilers emission factor shall be 1.8 lbs/MMscf for Hexane (110-54-3), 0.0034 lbs/MMscf for Toluene and shall be ~0 for all other HAPs.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Plaze, Inc. is a full service contract packager that specializes in aerosol packaging, located in St. Clair, Missouri. Some chemicals are blended onsite while other chemicals are received pre-blended. 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 tanks can be switched out with other tanks, depending on what product is being packaged at the facility, which affects the levels of emissions. In order to calculate the potential to emit, n-Hexane (Cas No. 110-54-3), is assumed as the chemical being stored in the tanks as this is the chemical with the highest emissions that the company would store on site. The installation is a major source of Volatile Organic Compounds (VOCs) and a synthetic minor source of Hazardous Air Pollutants (HAPs) and is not on the list of named installations found in 10 CSR 10-6.020(3)(B). Plaze, Inc. has a wide variety of products it packages, such as disinfectants, polishes and cleaners for both automotive and janitorial uses. Plaze, Inc. also packages cooking sprays for the food industry and adhesives for Industrial Maintenance.

All boilers are fueled with natural gas. Building one has five identical Raypack Steam Boilers, rated at 0.55 MMbtu/hr, installed in 1995 under Construction Permit 1095-004, Issued August 25, 1995. Building #2 has four identical Raypack boilers, rated at 0.55 MMbtu/hr, installed in 2004 under Construction Permit 0498-018E, Issued November 15, 2005.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/year) ¹
CO	7.95
NH ₃	0.30
NO _x	9.46
PM ₁₀	0.72
PM _{2.5}	0.72
SO _x	0.06
VOC	147.82
HAP ²	10/25 ²

¹Each 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 001).
- 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 002).

²The installation is limited by Permit Condition PW002 to:

- ◆ Less than 10 tons of any individual HAPs from the entire installation during any consecutive 12 month period.
- ◆ Less than 25 tons of HAPs in aggregate from the entire installation during any consecutive 12 month period.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.1256	0.14	0.0617	0.0472	0.0359
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.1256	0.14	0.0617	0.0472	--
Sulfur Oxides (SO _x)	0.0099	0.01	0.0123	0.0094	0.0071
Nitrogen Oxides (NO _x)	1.6515	1.84	2.0575	1.573	1.1966
Volatile Organic Compounds (VOC)	46.6633	46.69	41.9028	25.6572	52.133
Carbon Monoxide (CO)	1.3872	1.54	0.4321	0.3303	0.2513
Ammonia (NH ₃)	0.0529	0.06	--	--	--
Hazardous Air Pollutants (HAPs)	0.1485	0.22	0.1065	0.0565	0.077
Dichloromethane (75-09-2) (HAP)	0.1485	0.22	0.105	0.055	0.0755
Trichloroethylene (79-01-6) (HAP)	--	--	0.0015	0.0015	0.0015

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 February 16, 2016;
- 2) 2015 Emissions Inventory Questionnaire, received March 14, 2016; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit No. 1095-004, Issued August 25, 1995
- 5) Construction Permit No. 0596-032, Issued April 17, 1996
- 6) Construction Permit No. 0498-018, Issued April 4, 1998
- 7) Construction Permit No. 0498-018A, Issued June 10, 1998
- 8) Construction Permit No. 0498-018A Extension, Issued April 21, 2000
- 9) Construction Permit No. 0498-018B, Issued April 29, 2002
- 10) Construction Permit No. 0498-018C, Issued March 4, 2004
- 11) Construction Permit No. 0498-018C Extension, Issued April 22, 2004
- 12) Construction Permit No. 0498-018D, Issued September 6, 2005
- 13) Construction Permit No. 0498-018E, Issued November 15, 2005
- 14) No Construction Permit Required Determination, Issued March 7, 2002
- 15) No Construction Permit Required Determination, Issued January 17, 2007
- 16) No Construction Permit Required Determination, Issued June 10, 2008

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

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 10-5.030 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating* was applicable in the previously issued operating permit, OP2011-038, however, this regulation was rescinded on October 30, 2011 and is no longer valid.

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 10-5.520 *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; and*
10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

These rules are not applicable to the installation and have not been applied within this permit. On November 30, 2015 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* was rescinded and replaced with 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*. However, 6.260 is still contained in the State Implementation Plan (SIP) and will continue to be referenced until removed from the SIP. The only sulfur emitting sources at the installation are nine Raypack Natural Gas Steam Boilers, EP04 and EP16; however, these sources are exempt from both of these regulations as they exclusively combust pipeline grade natural gas.

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* is not applicable to the installation and has not been applied within this permit as the only fuel burning equipment used for indirect heating are the nine Raypack Natural Gas Steam Boilers, EP04 and EP16; however, these sources are exempt from this regulation as they exclusively combust pipeline grade natural gas.

Construction Permit History

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 not been applied within this permit. Special Condition four is covered by the state rule 10 CSR 10-6.165 *Restriction of Emission of Odors* and can be found in *Section IV. Core Permit Requirements*.

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 001). 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 – Group 01. Building No. 1 – Group 02 and Building No. 5 were not constructed until later and they are 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 001).

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 002).
- ◆ 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 001).
- ◆ Special Condition 5 has been applied within this permit (see Permit Condition 002).

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, EP21 – EP24 in Building No. 5.

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 Raypack Natural Gas Steam Boiler 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 m³ 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 m³ (19,812.9 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 003 and 004).

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

None

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.

Other Regulatory Determinations

10 CSR 10-5.500 *Control of Emissions From Volatile Organic Liquid Storage* is applicable to the installation. The installation does not operate any storage tanks with a capacity equal to or exceeding 40,000 gallons, however, each storage vessel with a design capacity less than forty thousand (40,000) gallons is subject to no provision of this rule other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is applicable to the installation. The installation's potential emissions of particulate matter were calculated to be 0.15 tons/year (0.04 lbs/hour). The particulate matter is due to emissions from the boilers, which run on natural gas. The maximum hourly design rate for the boilers in Building No. 1 – Group 01 is 0.0032 mmscf/hr and the maximum hourly design rate for the boilers in Building No. 5 is 0.0014 mmscf/hr. The Potential to Emit of PM₁₀ for the boilers in Building No.1– Group 01 is 0.1065 TPY and the potential to emit for PM₁₀ in Building No. 5 is 0.0467 TPY. As the installation's potential emissions of particulate matter are quite low, and the boilers are fueled by natural gas, the installation is assumed to always be in compliance with this regulation while being properly maintained and operated; therefore, no further monitoring, recordkeeping, and reporting is required at this time.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation. 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. The particulate matter is due to emissions from the boilers, which run on natural gas. The maximum hourly design rate for the boilers in Building No. 1 – Group 01 is 0.0032 mmscf/hr and the maximum hourly design rate for the boilers in Building No. 5 is 0.0014 mmscf/hr. The Potential to Emit of PM₁₀ for the boilers in Building No.1 – Group 01 is 0.1065 TPY and the potential to emit for PM₁₀ in Building No. 5 is 0.0467 TPY. As the installation's potential emissions of particulate matter are quite low, and the boilers are fueled by natural gas, the installation is assumed to always be in compliance with this regulation while being properly maintained and operated; therefore, no further monitoring, recordkeeping, and reporting is required at this time.

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 APCP'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 APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

On October 28, 2016 we received four comments from Mr. Mark A. Smith, Air Permitting and Compliance Branch, U.S. EPA's Region VII office in Lenexa, Kansas. The comments are addressed in the order in which they appear within the letter(s).

EPA Comment #1: MDNR's customary practice is to include examples of the permittee's compliance verification information collection worksheets as attachments in the draft operating permit for public review and comment. Permit Condition PW002 monitoring / record keeping requirements require the permittee to collect and retain several records as required by 40 CFR Part 63, Subpart VVVVVV: National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources. However, there are no examples of the record keeping worksheets for review and comment. EPA recommends MDNR follow their customary protocol and attach all worksheets for recording compliance verification information for public review and comment.

Response to Comment: The required information in Subpart VVVVVV is already required by tracking the Hap Limits as shown in Attachment C1, C2, D1 and D2 and operation capacity is already tracked in attachment E and F.

EPA Comment #2: Permit Condition PW002 incorporates the applicable requirements from 40 CFR Part 63, Subpart VVVVVV: National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources. MDNR relies on EPA for the compliance verification of area sources subject to the National Emission Standards for Hazardous Air Pollutants. Therefore, EPA's Region 7 Missouri Air Compliance Coordinator is the primary recipient of compliance verification information and therefore, the permittee's reporting requirements within Permit Condition PW002 are not as directed in Section V of the operating permit. EPA recommends MDNR modify Permit Condition PW002 reporting requirements directing the permittee to submit compliance reports to EPA.

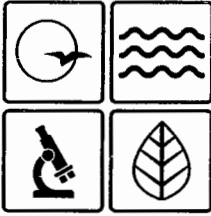
Response to Comment: Corrected so that they are sending the required reports to EPA.

EPA Comment #3: all requirements in all permit conditions shall be enforceable for a practical matter. EPA's primary guidance on practical enforceability is contained in "Guidance Limiting Potential to Emit in New Source Permitting," dated June 13, 1989. One of the important measures of practical enforceability is for the requirements to identify the "who," "what," "where," "when," "how," and "how often."

Response to Comment: Corrected

EPA Comment #4: Attachment C1: Plant wide Combined HAP Tracking Sheet and Attachment D1: Plant wide Individual HAP Tracking Sheet both use unreferenced emission factors for calculating compliance verification. EPA recommends MDNR reference the source of the emission factors used on Attachment C1 and Attachment D1.

Response to Comment: Added references for the factors



Missouri Department of

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NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 13 2017

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

Re: Plaze, Inc., 071-0157
Permit Number: OP2017-018

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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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 contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kbj

Enclosures

c: PAMS File: 2016-02-034



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