Missouri Department of Natural Resources
Air Pollution Control Program

TITLE V
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:	**OP2012-037A**
Installation ID:	189-0208
Expiration Date:	November 25, 2017
Project Number:	2013-07-020

Installation Name and Address
Printpack, Inc.
310 McDonnell Blvd.
Hazelwood, MO 63042

Parent Company's Name and Address
Printpack, Inc.
2800 Overlook Parkway NE
Atlanta, GA 30339

Installation Description:
Printpack, Inc. is a major source of VOC emissions. This facility uses flexographic and rotogravure presses to print packaging products. The printed products are coated with a plastic film applied by extruder/laminator equipment. Other operations include press-related solvent cleanup, photopolymer plate-making and one natural gas-fired boiler. A regenerative thermal oxidizer is used to control most of the processes.

The permit has been modified to include Printpack, Inc.'s CAM Plan (Condition EU0090-001) allowing for a 50 °F variance on the three-hour average, which was not included in Permit Condition EU0080-002 in the original permit.

OCT 0 8 2013
Effective Date

Kyra L Moore
Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Printpack, Inc. is a major source of VOC emissions. This facility uses flexographic and rotogravure presses to print packaging products. The printed products are coated with a plastic film applied by extruder/laminator equipment. Other operations include press-related solvent cleanup, photopolymer plate-making and one natural gas-fired boiler. A regenerative thermal oxidizer is used to control most of the processes.

The permit has been modified to include Printpack, Inc.'s CAM Plan (Condition EU0090-001) allowing for a 50 °F variance on the three-hour average, which was not included in Permit Condition EU0080-002 in the original permit.

Reported Air Pollutant Emissions (Tons per Year)								
Year	Volatile Organic Compounds (VOC)	Hazardous Air Pollutants (HAPs)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Carbon Monoxide (CO)	Lead (Pb)	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter 2.5-10 Microns (PM-2.5)
2007	252.14	0.48	0.03	4.19	3.44	0.00	0.31	0.08
2008	233.46	0.32	0.02	4.11	3.45	0.00	0.31	0.08
2009	74.35	0.00	0.03	4.29	3.61	0.00	0.33	0.08
2010	131.72	0.00	0.03	4.50	3.78	0.00	0.34	0.09
2011	71.05	0.00	0.02	4.15	3.48	0.00	0.32	0.08

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0020	Flexographic Presses #26, 27, 28
EU0030	Rotogravure Press #35
EU0050	Flexographic Press #25
EU0080	Regenerative Thermal Oxidizer
EU0090	Controlled Parts Washers
EU0100	Cold Cleaner Parts Washer
EU0130	Extruder #3
EU0150	Photopolymer Plate Making
EU0190	150 kW Diesel Emergency Generator

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	Boiler #1
EU I-002	250 hp Receiving Dock Emergency Diesel Generator (installed in 1980s)
EU I-008	Portable Propane Salamander
EU0120	Extruder #2 (non-VOC, not vented to RTO)
EU0140	Extruder #5 (water-based solvents, not vented to RTO), Saint Louis County Air Pollution Control Program Operating Permit #4860
EU0160	Rail Poly System #1
EU0170	Rail Poly System #2
EU0180	Trim Removal System

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1) Saint Louis County Air Pollution Control Program Construction Permit #4368
2) Saint Louis County Air Pollution Control Program Construction Permit #5687
3) Saint Louis County Air Pollution Control Program Construction Permit #5905
4) Saint Louis County Air Pollution Control Program Construction Permit #5979
5) Saint Louis County Air Pollution Control Program Construction Permit #5980
6) Saint Louis County Air Pollution Control Program Construction Permit #7045
7) Saint Louis County Air Pollution Control Program Construction Permit #7278
8) Saint Louis County Air Pollution Control Program Construction Permit #7723

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.

Permit Condition PW001
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Emission Limitations:

1) The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant of opacity greater than 20% unless it is an existing source (existing prior to March 24, 1967), which emits less than 25 lbs/hr PM.
2) If it is an existing source, which emits less than 25 lbs/hr PM, then the permittee shall not discharge into the ambient air any air contaminant of an opacity greater than 40%.
3) A source with a 20% limit may emit air contaminants with an opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes.
4) Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements, the requirements shall not apply.

Monitoring:

1) Conduct visual emission observations of all subject emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations are required. For emission units where visible emissions are observed, the source representative shall then conduct a Method 9 observation.
2) The following monitoring schedule must be maintained:
   a) Observations must be made once per month. If a violation is noted, then-
   b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then-
   c) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then monthly observations shall be resumed.

Recordkeeping:

1) Maintain records of all observation results noting whether any air emissions (except for water vapor) were visible from the emission units (Attachment A).
2) Maintain records any Method 9 test performed in accordance with this permit condition (Attachment B).
3) Maintain records of any equipment malfunctions.
4) Records shall be completed and available for review by the 10^{th} day following the end of each month.
5) Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the Saint Louis County Air Pollution Control Program at 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the discovery of an exceedance of the opacity limit.

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.

EU0020—Flexographic Presses #26, 27, 28

General Description:	Flexographic printing press including ink and dilution solution
Manufacturer/Model #:	#26 Flexographic Press: 6-Color Press, controlled by RTO, Installed 1983 #27 Flexographic Press: 8-Color Press, controlled by RTO, Installed 1991 #28 Flexographic Press: 8-Color Press, controlled by RTO, Installed 1994
EIQ Reference # (2008):	EP002
STLCO Operating Permit #:	5520 , 5905, 5980

Permit Conditions EU0020-001

10 CSR 10-5.340, *Control of Emissions from Rotogravure and Flexographic Printing Operations*

Emission Limitation:

1. The permittee shall not use or permit the use of any flexographic printing press unless one of the following conditions are met:
   a) The press is equipped with a control device that shall remove, destroy or prevent the emission of VOCs into the ambient air by at least 60% by weight of the uncontrolled VOC emissions on a daily weighted basis; or
   b) Low solvent technology is used to achieve VOC reduction provided the following limits are met for each press:
      i. For waterborne inks, the volatile portion of the ink as applied to the substrate must contain no more than 25% by volume VOC; and
      ii. For water-based or high solids inks, the ink as applied to the substrate must be at least 60% by volume non-VOC material.
2. The permittee shall not use or permit the use of any flexographic printing press that uses cleanup solvents containing VOCs unless –
   a) The cleanup solvents are kept in tightly covered tanks or containers during transport and storage;
   b) The cleaning cloths used with the cleanup solvents are placed in tightly closed containers when not in use and while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed of. The cloths, when properly cleaned and disposed of, are processed in a way that as much of the solvent as practicable is recovered for some further use or destroyed. Cleaning and disposal methods shall be approved by the director; and
   c) The permittee may use an alternate method for reduction cleanup solvent VOC emission, including the use of low VOC cleanup solvents, if the permittee shows the emission reduction is equal to or greater than (a) and (b) above. This alternate method must be approved by the director.

Monitoring/Recordkeeping:

1. Printpack currently complies with the emission limitations of this regulation by using an add-on control device, an RTO. If Printpack chooses to comply using the low solvent technology method, monitoring requirements as specified in 10 CSR 10-5.340(4)(B) or (4)(C) shall apply.
2. If an add-on control device is used to meet the applicable emission limitations, the permittee shall monitor and keep records of the following parameters:
   a) Exhaust gas temperature (combustion temperature) of incinerator;
   b) Results of any emissions testing required under 10 CSR 10-5.340(5);
   c) Maintenance, repairs and malfunction of any air pollution control equipment when performed; and
   d) Any other monitoring parameter required by the director to determine compliance with the control efficiency limitation.
3. Records shall be completed and available for review by the 10th day following the end of each month.
4. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of 10 CSR 10-5.340.

Permit Condition EU0020-002

10 CSR 10-6.060, *Construction Permits Required*
STLCO Construction Permit #5520, 5905, 5980

Emission Limitation/Monitoring:

Each press shall only be operated when the RTO is online.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from this permit condition.

EU0030—Rotogravure Press #35

General Description:	Rotogravure printing press including ink and dilution solution
Manufacturer/Model #:	8-Color Press, controlled by RTO, Installed 1984
EIQ Reference # (2008):	EP003
STLCO Operating Permit #:	5687

Permit Condition EU0030-001

10 CSR 10-5.340, *Control of Emissions from Rotogravure and Flexographic Printing Operations*

Emission Limitation:

1. The permittee shall not use or permit the use of any rotogravure printing press unless one of the following conditions are met:
   a) The press is equipped with a control device that shall remove, destroy or prevent the emission of VOCs into the ambient air by at least 65% by weight of the uncontrolled VOC emissions on a daily weighted basis; or
   b) Low solvent technology is used to achieve VOC reduction provided the following limits are met for each press:
      i. For waterborne inks, the volatile portion of the ink as applied to the substrate must contain no more than 25% by volume VOC; and
      ii. For water-based or high solids inks, the ink as applied to the substrate must be at least 60% by volume non-VOC material.
2. The permittee shall not use or permit the use of any rotogravure printing press that uses cleanup solvents containing VOCs unless –
   a) The cleanup solvents are kept in tightly covered tanks or containers during transport and storage;
   b) The cleaning cloths used with the cleanup solvents are placed in tightly closed containers when not in use and while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed of. The cloths, when properly cleaned and disposed of, are processed in a way that as much of the solvent as practicable is recovered for some further use or destroyed. Cleaning and disposal methods shall be approved by the director; and
   c) The permittee may use an alternate method for reduction cleanup solvent VOC emission, including the use of low VOC cleanup solvents, if the permittee shows the emission reduction is equal to or greater than (a) and (b) above. This alternate method must be approved by the director.

Monitoring/Recordkeeping:

1. Printpack currently complies with the emission limitations of this regulation by using an add-on control device, an RTO. If Printpack chooses to comply using the low solvent technology method, monitoring requirements as specified in 10 CSR 10-5.340(4)(B) or (4)(C) shall apply.
2. If an add-on control device is used to meet the applicable emission limitations, the permittee shall monitor and keep records of the following parameters:
   a) Exhaust gas temperature (combustion temperature) of incinerator;
   b) Results of any emissions testing required under 10 CSR 10-5.340(5);
   c) Maintenance, repairs and malfunction of any air pollution control equipment when performed; and
   d) Any other monitoring parameter required by the director to determine compliance with the control efficiency limitation.
3. Records shall be completed and available for review by the 10th day following the end of each month.
4. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:
Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of 10 CSR 10-5.340.

Permit Condition EU0030-002

10 CSR 10-6.060, *Construction Permits Required*
STLCO Construction Permit #5687

Emission Limitation/Monitoring:
This press shall only be operated when the RTO is online.

Reporting:
Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from this permit condition.

EU0050—Flexographic Press #25

General Description:	Flexographic printing press including ink and dilution solution
Manufacturer/Model #:	#25 Flexographic Press: 6-Color Press, low solvent technology, Installed 1978
EIQ Reference # (2008):	EP005
STLCO Operating Permit #:	4525

Permit Conditions EU0050-001

10 CSR 10-5.340, *Control of Emissions from Rotogravure and Flexographic Printing Operations*

Emission Limitation:
1. The permittee shall not use or permit the use of any flexographic printing press unless one of the following conditions are met:
   a) The press is equipped with a control device that shall remove, destroy or prevent the emission of VOCs into the ambient air by at least 60% by weight of the uncontrolled VOC emissions on a daily weighted basis; or
   b) Low solvent technology is used to achieve VOC reduction provided the following limits are met for each press:
      i. For waterborne inks, the volatile portion of the ink as applied to the substrate must contain no more than 25% by volume VOC; and
      ii. For water-based or high solids inks, the ink as applied to the substrate must be at least 60% by volume non-VOC material.
2. The permittee shall not use or permit the use of any flexographic printing press that uses cleanup solvents containing VOCs unless –
   a) The cleanup solvents are kept in tightly covered tanks or containers during transport and storage;

b) The cleaning cloths used with the cleanup solvents are placed in tightly closed containers when not in use and while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed of. The cloths, when properly cleaned and disposed of, are processed in a way that as much of the solvent as practicable is recovered for some further use or destroyed. Cleaning and disposal methods shall be approved by the director; and
c) The permittee may use an alternate method for reduction cleanup solvent VOC emission, including the use of low VOC cleanup solvents, if the permittee shows the emission reduction is equal to or greater than (a) and (b) above. This alternate method must be approved by the director.

Monitoring/Recordkeeping:

1. For this emission unit, Printpack currently complies with the emission limitations of this regulation by using low solvent technology. If Printpack chooses to comply using an add-on control, monitoring requirements as specified in 10 CSR 10-5.340(4)(A) shall apply.
2. If low solvent technology is used to meet the applicable emission limitations for each ink formulation used, the permittee shall monitor and keep records of the following:
   a) Volume-weighted ink VOC content in percent by volume for each ink formulation as applied on a monthly basis;
   b) Results of ink testing as required by 10 CSR 10-5.340(5) when performed; and
   c) Any other information required by the director to determine compliance with the low solvent technology limitations.
3. If low solvent technology without the use of control equipment is used to meet the applicable emission limitations and for whom Subsection 10 CSR 10-5.340(4)(B) does not apply (i.e. each formulation does not comply individually), the permittee shall monitor and keep records of the following:
   a) Volume-weighted ink VOC content in percent by volume for each ink formulation as applied on a monthly basis;
   b) Ink usage in gallons for each ink formulation as applied on a daily basis for each press;
   c) Volume-weighted density of VOCs in ink in pounds per gallon for each ink formulation as applied on a daily basis;
   d) Volume-weighted average of the VOC content of each ink formulation as applied in percent by volume for each press on a daily basis;
   e) Ink water content in percent by volume for each ink formulation as applied on a daily basis for each press;
   f) Ink exempt solvent content in percent by volume for each ink formulation as applied on a daily basis for each press;
   g) Results of ink testing as required in 10 CSR 10-5.340(5) when performed; and
   h) Any other information required by the director to determine compliance with the low solvent technology limitations.
4. Records shall be completed and available for review by the 10^{th} day following the end of each month.
5. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of 10 CSR 10-5.340.

EU0080—Regenerative Thermal Oxidizer

General Description:	20.3 mmBtu/hr Natural Gas Regenerative Thermal Oxidizer
Manufacturer/Model #:	Adwest Technologies, Inc./RETOX 80.0 RTO95 dual chamber RTO, Installed 2008
EIQ Reference # (2009):	EP001
STLCO Operating Permit #:	7045

Permit Conditions EU0080-001

10 CSR 10-5.340, *Control of Emissions from Rotogravure and Flexographic Printing Operations*
40 CFR Part 64, Compliance Assurance Monitoring (CAM)

Emission Limitation:

1. The permittee shall not use or permit the use of any flexographic printing press unless one of the following conditions are met:
   a) The press is equipped with a control device that shall remove, destroy or prevent the emission of VOCs into the ambient air by at least 60% by weight of the uncontrolled VOC emissions on a daily weighted basis; or
   b) Low solvent technology is used to achieve VOC reduction provided the following limits are met for each press:
      i. For waterborne inks, the volatile portion of the ink as applied to the substrate must contain no more than 25% by volume VOC; and
      ii. For water-based or high solids inks, the ink as applied to the substrate must be at least 60% by volume non-VOC material.
2. The permittee shall not use or permit the use of any flexographic printing press that uses cleanup solvents containing VOCs unless –
   a) The cleanup solvents are kept in tightly covered tanks or containers during transport and storage;
   b) The cleaning cloths used with the cleanup solvents are placed in tightly closed containers when not in use and while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed of. The cloths, when properly cleaned and disposed of, are processed in a way that as much of the solvent as practicable is recovered for some further use or destroyed. Cleaning and disposal methods shall be approved by the director; and
   c) The permittee may use an alternate method for reduction cleanup solvent VOC emission, including the use of low VOC cleanup solvents, if the permittee shows the emission reduction is equal to or greater than (a) and (b) above. This alternate method must be approved by the director.

Monitoring/Recordkeeping/Reporting:

1. The performance requirements for the Regenerative Thermal Oxidizer and an excursion with its associated averaging time for each emission unit shall be as specified in the following table:

	Indicator #1	**Indicator #2**	**Indicator #3**	**Indicator #4**
I. Indicator	Temperature in Combustion Chamber[a]	Work practice/inspection	Performance test	Pressure Differential
Measurement approach	Continuously record the temperature at RTO's combustion chamber.	Inspect internal and external structural integrity of each oxidizer to ensure proper operation[b]	Conduct emission test to demonstrate compliance with permitted destruction efficiency	Record duct pressure prior to RTO's main fan
II. Indicator Range	Whenever a connected process is in operation, an excursion is identified as a three-hour average temperature measurement of more than 50º F below the setpoint temperature used to demonstrate compliance during the most recent VOC emission test	An excursion is identified as any finding that the structural integrity of an oxidizer has been jeopardized and it no longer operates as designed	An excursion is identified as any finding that an oxidizer does not meet the permitted destruction efficiency	An excursion is identified as any finding that the indicator range is at a value greater than 85 percent of the 3-hour average value measured during the most recent capture efficiency test. Establish the range based upon the test data, historical data and engineering judgment.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers as assessment of the problem, corrective action and a reporting requirement
QIP Threshold	The QIP threshold for any individual emission unit is 9 excursions in a 6-month reporting period. If an emission unit reaches the QIP threshold, the permittee shall submit a QIP for that unit along with the Semi-annual Monitoring Report for that reporting period.			

III. Performance Criteria				
A. Data Representativeness	Any temperature monitoring device employed to measure temperature shall be accurate to within one percent of temperature measured or plus/minus one degrees C, whichever is greater	Inspections of the oxidizer system will identify problems	A test protocol shall be prepared and (if necessary) approved by the regulatory agency prior to conduction the performance test	Continuously monitoring the pressure will assure that adequate flow to achieve the designed capture rate is maintained.
B. Verification of Operation Status	Temperatures recorded on chart paper or electronic media	Inspection records	Not applicable	Not applicable
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria plus or minus 20 degrees F[a]	Not applicable	U.S. EPA test methods approved in agency's rules or in test protocol	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instruction
D. Monitoring Frequency	Measured Continuously	External inspection monthly; internal inspection annually	Once every five years	Monitor at least four times per hour.
Data Collection Procedure	Recorded at least every 15-	Recorded results of inspections and	Per approved test methods	Digital datalogger or

Averaging Period	minutes on a chart or electronic media	observations		circular chart recorder.
	Three hours if using 3-hour average as indicator	Not applicable	Not applicable	Three hours if using 3-hour average as indicator
E. Recordkeeping	Maintain for a period of five years records of chard recorder paper or electronic media and corrective actions taken in response to excursions	Maintain for a period of five years records of inspections and corrective actions taken in response to excursions	Maintain a copy of the test report for each oxidizer for five years or until another test is conducted. Maintain records of corrective actions taken in response to excursions	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken	Number, duration, cause of any excursion and the corrective action taken	Submit test protocol and notification of testing to regulatory agency 30 days prior to test date. Submit test report 60 days after conducting a performance test	Number , duration, cause of any excursion and the corrective action taken
Frequency	Semi-annually	Semi-annually	For each performance test conducted	Semi-annually

[a] Procedure for verifying accuracy maintained on-site.

[b] Internal inspection includes annual assessment of the ceramic media (this assessment may be comprised of an internal inspection or other method for assessing integrity and does not necessarily include a visual inspection).

2. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [§64.7(b)]

3. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall collect data at all required intervals at all times that the pollutant-specific emissions units are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§64.7(c)]
4. Response to excursions or exceedances: [§64.7(d)]
   a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [§64.7(d)(1)]
   b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [§64.7(d)(2)]
5. Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [§64.7(e)]

Quality improvement plan (QIP):

1. The permittee shall develop and implement a QIP if the unit has accumulated excursions exceeding five percent duration of the operating time during the reporting period.
2. Elements of a QIP: [§64.8(b)]
   a) The owner or operator shall maintain a written QIP, if required, and have it available for inspection. [§64.8(b)(1)]

b) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate: [§64.8(b)(2)]
   i. Improved preventive maintenance practices. [§64.8(b)(2)(i)]
   ii. Process operation changes. [§64.8(b)(2)(ii)]
   iii. Appropriate improvements to control methods. [§64.8(b)(2)(iii)]
   iv. Other steps appropriate to correct control performance. [§64.8(b)(2)(iv)]
   v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (b)(2)(i) through (iv) of this section). [§64.8(b)(2)(v)]

3. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. [§64.8(c)]
4. Following implementation of a QIP, upon any subsequent determination pursuant to §64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have: [§64.8(d)]
   a) Failed to address the cause of the control device performance problems; or [§64.8(d)(1)]
   b) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. [§64.8(d)(2)]
5. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. [§64.8(e)]

Recordkeeping:

1. The owner or operator shall submit monitoring reports to the permitting authority in accordance with §70.6(a)(3)(iii) of this chapter. [§64.9(a)(1)]
2. A report for monitoring under this part shall include, at a minimum, the information required under §70.6(a)(3)(iii) of this chapter and the following information, as applicable: [§64.9(a)(2)]
   a) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [§64.9(a)(2)(i)]
   b) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [§64.9(a)(2)(ii)]
   c) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [§64.9(a)(2)(iii)]
3. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [§64.9(b)(2)]

4. All records shall be kept on-site for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The owner or operator shall comply with the recordkeeping requirements specified in §70.6(a)(3)(ii) of this chapter. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [§64.9(b)(1)]
2. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
3. The permittee shall report any deviations from the emission limitation, monitoring, quality improvement plan, 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 Conditions EU0080-002

10 CSR 10-6.060, *Construction Permits Required*
STLCO Construction Permit #7045

Emission Limitation:

1. The RTO shall be operated at a minimum of 1,600 degrees Fahrenheit, plus or minus 50 degrees Fahrenheit, on a three hour rolling average, whenever any equipment controlled by the RTO is in operation. This temperature is based on the most recent stack test, November 17-18, 2009. Subsequent stack tests, approved by the Saint Louis County Air Pollution Control Program, may establish a different minimum operating temperature.
2. The static pressure in the duct at the inlet of the thermal oxidizer shall be maintained at minus one and five tenths (-1.5) inches of water column or less on a three (3) hour rolling average whenever any equipment controlled by the RTO is in operation. This pressure is based on the most recent stack test, November 17-18, 2009. Subsequent stack tests, approved by the Saint Louis County Air Pollution Control Program, may establish a different pressure limitation.

Monitoring:

1. A continuous temperature and pressure monitoring system for the thermal oxidizer shall be installed, maintained, and operated in accordance with manufacturer's recommendations. The monitoring system shall be calibrated annually.
2. Should the continuous monitoring for temperature or static pressure fail to meet the three hour rolling average contained in conditions #1 and/or #2 under the Emission Limitation Section above; Printpack shall shut down the operating equipment in a timely manner until such time as the RTO can again demonstrate compliance with both conditions #1 and #2.

Recordkeeping:

1. Maintain continuous records of the combustion temperature and static pressure. Records of three hour averages must be calculated and maintained for each incident that the monitor shows a deviation from the set point (1600 degrees Fahrenheit and -1.5 inches water column). Electronic records are acceptable to meet this requirement.
2. Maintain all records of inspections, maintenance, calibration and repair of the RTO.
3. Maintain records of any results of any emissions testing required under 10 CSR 10-5.340(5);
4. Records shall be completed and available for review by the 10th day following the end of each month.
5. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of this condition.
2. Notify the St. Louis County Air Pollution Control Program of any failure to meet conditions #1 and/or #2 under the Emission Limitation Section above by no later than the next working day. This notification is not required to be certified by a responsible official.

EU0090—Controlled Parts Washers

General Description:	(6) Parts Washers controlled by RTO
Manufacturer/Model #:	PRI and Unknown
EIQ Reference # (2008):	EP004
STLCO Operating Permit #:	4366, 7273, 7274, 7275, 7276, 7277

Permit Conditions EU0090-001

10 CSR 10-5.340, *Control of Emissions from Rotogravure and Flexographic Printing Operations*

Emission Limitation:

1. The permittee shall not use or permit the use of any flexographic or rotogravure printing press that uses cleanup solvents containing VOCs unless –
   a) The cleanup solvents are kept in tightly covered tanks or containers during transport and storage;
   b) The cleaning cloths used with the cleanup solvents are placed in tightly closed containers when not in use and while awaiting off-site transportation. The cleaning cloths should be properly cleaned and disposed of. The cloths, when properly cleaned and disposed of, are processed in a way that as much of the solvent as practicable is recovered for some further use or destroyed. Cleaning and disposal methods shall be approved by the director; and
   c) The permittee may use an alternate method for reduction cleanup solvent VOC emission, including the use of low VOC cleanup solvents, if the permittee shows the emission reduction is equal to or greater than (a) and (b) above. This alternate method must be approved by the director.

Monitoring/ Recordkeeping:

1. For cleanup processes, Printpack has chosen to comply with the applicable emission limitations using the RTO. The permittee shall therefore monitor and keep records of the following parameters:
   a) Exhaust gas temperature (combustion temperature) of incinerator;
   b) Results of any emissions testing required under 10 CSR 10-5.340(5);
   c) Maintenance, repairs and malfunction of any air pollution control equipment when performed; and
   d) Any other monitoring parameter required by the director to determine compliance with the control efficiency limitation.
2. Records shall be completed and available for review by the 10th day following the end of each month.
3. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the Saint Louis County Air Pollution Control Program at 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than thirty (10) days after the discovery of any exceedance of the cleanup solvent requirements established in 10 CSR 10-5.340.

EU0100—Cold Cleaner Parts Washer

General Description:	(1) Cold cleaner (maintenance)
Manufacturer/Model #:	Safety Kleen
EIQ Reference # (2008):	NA
STLCO Operating Permit #:	7278

Permit Conditions EU0100-001

10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*

Emission Limitation:

1. Equipment specifications (Section (3)(A)1 Cold Cleaners):
   a) The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)). [Per 10 CSR 10-5.300(1)(D)2.B., cold cleaners using solvents regulated under any federal NESHAP shall be exempt from the solvent vapor pressure requirement].
   b) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors while in the closed position, or enclosed reservoir, which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner.
   c) Exemptions under (1)(D) of the regulation may apply.
   d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the director.

e) When one (1) or more of the following conditions exist the design of the cover shall be such that it can easily be operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system).
   i) The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F)
   ii) The solvent is agitated.
   iii) The solvent is heated.
f) A drainage facility allowing parts to drain while the cover is closed is required.
g) If an internal drainage facility as in (f) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
h) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard.
i) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
j) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must have one (1) of the following control devices:
   i) A freeboard ratio of at least 0.75
   ii) Water cover (solvent must be insoluble in and heavier than water)
   iii) Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65%) and is approved by the director prior to use.

2. Operating procedures (Section (3)(B)1 Cold Cleaners):
   a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
   b) Cleaned parts shall be drained in the free board area for fifteen (15) seconds, or until dripping stops, whichever is longer.
   c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until trained service personnel are able to restore operation within the established parameters.
   d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
   e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable.
   f) Waste solvent shall be stored in closed containers only.
3. Operator and Supervisor Training (Section (3)(C)):
   a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
   b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
   c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months.

Monitoring/ Recordkeeping:

1. Monthly records of the following shall be maintained:
   a) Types and amounts of solvent containing waste material from cleaning or degreasing operations:
      i) Transferred to a contract reclamation service or disposal facility
      ii) Distilled on the premises
   b) Maintenance and repair logs for the cold cleaner and any associated control equipment.
2. For cold cleaners subject to (3)(A)1 (a) or (b) the following records for each purchase of cold cleaning solvent shall be maintained:
   a) The name and address of the solvent supplier;
   b) The date of purchase;
   c) The type of solvent; and
   d) The vapor pressure of the solvent in mmHg at 20°C (68°F)
3. Keep a record of the cold cleaner training for each employee.
4. Records shall be completed and available for review by the 10th day following the end of each month.
5. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the Saint Louis County Air Pollution Control Program at 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the discovery of any exceedance of the cold cleaner requirements established in 10 CSR 10-5.300.

EU0130—Extruder #3

General Description:	Extrusion of plastic onto printed flexible packaging, controlled by RTO, Installed 1969
Manufacturer/Model #:	Custom Built Egan Machinery Serial Number 34210
EIQ Reference # (2008):	EP003
STLCO Operating Permit #:	4368

Permit Condition EU130-001

10 CSR 10-6.060, *Construction Permits Required*
STLCO Construction Permit #4368

Emission Limitation:

Adhesives containing VOC greater than nine (9) percent by weight, as applied, shall not be utilized unless emissions are vented to the RTO.

Monitoring/ Recordkeeping:

1) Notify the Saint Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program prior to using an adhesive that contains

greater than nine (9) percent by weight, as applied, and that would require emissions from Extruder #3 to be vented to the RTO.
2) Maintain monthly records of adhesives used, including the VOC percent by weight, as applied.
3) Records shall be completed and available for review by the 10th day following the end of each month.
4) Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:
Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from this permit condition.

EU0150—Photopolymer Plate Making

General Description:	Production of printing plates for use in the flexographic presses
Manufacturer/Model #:	Dupont Cyrel, 52.5 sq. ft./hr, Installed 1994
EIQ Reference # (2009):	NA
STLCO Operating Permit #:	5979

Permit Condition EU150-001

10 CSR 10-6.060, *Construction Permits Required*
STLCO Construction Permit #5979

Emission Limitation:
Plate manufacturing is limited to the production of 52,084 square feet of area in any 12-month rolling period.

Monitoring/Recordkeeping:
1. Maintain records of plate production on a monthly and 12-month rolling total basis.
2. Records shall be completed and available for review by the 10th day following the end of each month.
3. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:
Report to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of this permit condition.

EU0190-Emergency Generator

General Description:	Production of printing plates for use in the flexographic presses
Manufacturer/Model #:	Kohler 150/150ROZJ81, Installed 1993
EIQ Reference # (2009):	NA
STLCO Operating Permit #:	7723

Permit Condition EU190-001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines[1]

[1]An existing emergency stationary CI RICE located at an area source of HAP emissions must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)(1)]

Operational Limitations:

1. At all times the permittee must operate and maintain the affected engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available including review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the engine. [§63.6605(b)]
2. The permittee must meet the following requirements (except during periods of engine startup): [§63.6603(a)]
   a) Change the engine oil and oil filter every 500 hours of operation or annually, whichever comes first;
   b) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
   c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
3. The Permittee shall only operate the engines within the following hour limitations: [§63.6640(f)]
   a) Unlimited use in emergency situations. [§63.6640(f)(1)(i)]
   b) 50 hours per year for any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations. [§63.6640(f)(1)(iii)]
   c) 100 hours per year for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The 50 hours allowed above count towards this 100 hour limitation. [§63.6640(f)(1)(ii)]
4. If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. The permittee shall report any failure to perform the management practice on the schedule required and the Federal, State, or local law under which the risk was deemed unacceptable [§63.6603(a)]

5. During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)]
6. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements of this condition. The oil analysis shall be performed at every 500 hours of operation or annually. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil before continuing to use the engine. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(i)]
7. The permittee must install a non-resettable hour meter on this engine if one is not already installed. [§63.6625(f)]

Recordkeeping:

1. The permittee must keep the following records for this engine: [§63.6655(a)]
   a) Records of the occurrence and duration of each malfunction of process equipment or any air pollution control and monitoring equipment and actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(2) and §63.6655(a)(5)]
   b) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
   c) Records that the engine was operated and maintained according to the manufacturer's emission-related operation and maintenance instructions or that a maintenance plan has been developed to provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6655(e)]
   d) Records of the hours of operation for the engine as measured by the non-resettable hour meter. The installation shall also maintain a recordkeeping form indicating out of the total hours measured by the meter: [§63.6655(f)]
      i. How many hours were spent in emergency use and a brief description of the emergency situation.
      ii. How many hours were spent in non-emergency operation.
   e) These records shall be made available for inspection upon request by Missouri DNR personnel. [§63.6660(a)]
   f) The permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Reporting:

The permittee shall report any deviations from the operational limitations, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and

compliance certification required by Section V of this permit. These reports shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction. If there are no deviations from any operating limitations that apply, a statement that there were no deviations from the operating limitations during the reporting period shall be included. [§63.6650(c)]

IV. Core Permit Requirements

This section lists excerpts from applicable regulations. The installation is responsible for complying with the cited portions of the regulations as found in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR). All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.045 Open Burning Restrictions

No person may conduct, cause, permit, or allow the disposal of tires, petroleum-based products, trade waste, construction or demolition waste, salvage operation waste, or asbestos containing materials by open burning, except as permitted by this regulation.

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 ten 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.
6) Any reports required by this rule are not required to be signed or certified by the Responsible Official.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2) The permittee 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.

3) The fees shall be due on the date specified by 10 CSR 10-6.110(3)(D)F each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

1) The permittee shall not cause or allow 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 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. Qualified personnel shall perform all tests.
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's Enforcement Section. 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's Enforcement Section. 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 Saint 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 10-6.165 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

1) Residential, recreational, institutional, retail sales, hotel or educational premises.
2) Industrial premises when air containing odorous matter is diluted with twenty (20) or more volumes of odor-free air; or
3) Premises other than those in paragraphs (1)A.1. and 2. of the rule when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when thirty percent (30%) or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least twenty (20) people or seventy-five percent (75%) of those exposed if fewer than twenty (20) people are exposed.

10 CSR 10-5.450 Coating of VOC Emissions from Traffic Coatings

1) No person shall supply, sell, offer for sale, apply, or solicit the application of any traffic coating, which at the time of sale or manufacture contains more than 1.26 pounds VOC per gallon, excluding water, exempt compounds, and any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the Saint Louis metropolitan area without the approval of the staff director.
2) All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to, being accessed, filled, emptied, or repaired.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

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

V. Saint Louis County Air Pollution Control Code Requirements

Section 612.040, Air Quality Standards and Air Pollution Control Regulations

Saint Louis County Air Pollution Control Program may enforce Missouri Code of State Regulations as adopted and promulgated by the Air Conservation Commission of the State of Missouri consisting of Title 10, Division 10, Chapter 5 and 6.

Section 612.100, Emergency Abatement of Violation

By written approval of the County Executive, any facility indirectly or directly discharging any air contaminant in violation of the Saint Louis County Air Pollution Control Code where it is the opinion of the Director that the discharge creates an emergency which requires immediate action to protect the public health, shall order the person in writing to discontinue immediately.

Section 612.110, Permits Required

The permittee shall obtain Saint Louis County Air Pollution Control Program operating permits for its installation. The permittee shall not commence construction, modification, or major modification of any installation subject to this rule without obtaining a permit from Saint Louis County Air Pollution Control Program.

Section 612.120, Permits to be Visibly Affixed or Placed

The permittee shall visibly affix Saint Louis County Air Pollution Control Program Permit on or near permitted equipment.

Section 612.200, Testing Prior to Granting of Operating Permit

Before an authority to construct or permit to operate is granted, the Director may require the applicant to conduct tests to determine the kind or amount of the air contaminant emitted from the equipment. Such tests shall be conducted, reviewed and certified by a licensed engineer under Chapter 327 RSMo 1959. The permittee shall notify the Saint Louis County Air Pollution Control Program of the time and place of testing for the purpose of witnessing the test.

Section 612.220, Suspension or Revocation of Permits

The Director may suspend or revoke a permit to operate or authority to construct for willful or continued violation of the Saint Louis County Air Pollution Control Code.

Section 612.250 Fees, When Payable, Exceptions

Fees for authority to construct and operating permits in the amounts provided in Section 612.260 shall be paid to the Director except as provided in Subsections 3 and 4 of this rule.

Section 612.260, Schedules

The permittee shall pay the Saint Louis County Air Pollution Control Program Construction and Operating Permit fees when applicable and annual Emission and Inspection fees in accordance with this rule.

Section 612.280, Testing by Order of the Board

If any article, machine, equipment or other contrivance is in violation of the Saint Louis County Air Pollution Control Code, the Director may file with the Board for its approval an order directing the permittee of such equipment to conduct such tests as are necessary in the opinion of the Director and approved by the Board to determine whether the equipment is in violation of this Code. The entire test results shall be reviewed and certified by an engineer licensed under Chapter 327, RSMo 1959. The engineer shall be selected by the permittee and approved by the Board. The permittee shall give at least seven (7) days' notice prior to the commencement of the test. The permittee shall submit the test results to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134.

Section 612.290, Right of Entry; Inspections; Samples

The permittee shall allow the Director or His agent to enter at all times with reasonable notice, inspect any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants, inspect any records relating to the use of any equipment or control apparatus which affect or may affect the emission of air contaminants, and sample any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants.

Section 612.310, Upset Conditions, Breakdown or Scheduled Maintenance

Emissions exceeding any of the limits established by the St. Louis County Air Pollution Control Code as a direct result of unavoidable upset conditions in the nature of the process or unavoidable and unforeseeable breakdown of any air pollution equipment or related operating equipment or as a direct result of shutdown of such equipment for necessary scheduled maintenance, shall not be deemed in violation of this Code provided the following are met:

1) Such occurrence in the case of unavoidable upset in or breakdown of equipment shall have been reported to the Director within twenty-four (24) hours after the occurrence.
2) In the case of shutdown for necessary scheduled maintenance, the intent to shut down shall be reported to the Director at least twenty-four (24) hours prior to the shut down and the exception provided by this section shall only apply in those cases where maximum reasonable effort, including off-shift labor where required, has been made to accomplish such maintenance during periods of non-operation of any related source operation and that it would be unreasonable or impossible to shut down the source operation during the maintenance period.
3) The person, firm or corporation responsible for such emission shall submit to the Director a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences including but not limited to action to correct the conditions causing such emission to exceed said limits, to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded and to reduce the length of time for which said limits are exceeded.

Section 612.340, Air Pollution Nuisances Prohibited

1) It is unlawful for the permittee to cause the escape of such quantities of soot, cinders, noxious acids, fumes and gases or other particulate matter from whatever source in such place or matter as to be detrimental to any person or the public or to endanger the health, comfort and safety of any person or the public, injury or damage to property or business.

2) No person shall cause or permit the engine of a motor vehicle, other than an emergency vehicle, to idle for longer than three (3) consecutive minutes while parking, standing or stopped as defined in the St. Louis County Traffic Code, unless the engine is being used to operate a loading, unloading or processing device.

Section 612.380, Interfering with or Obstructing Division Personnel

No person shall hinder, resist, interfere with or obstruct the Director or any Division employee in carrying out any duty for the Director or the Board.

Section 612.530, Saint Louis County Air Pollution Control Program **Asbestos Abatement Rules and Regulations—Registration, Notification and Performance Requirements**

The permittee shall conduct all asbestos abatement projects within the procedures and requirements established in 612.530.

VI. General Permit Requirements

This section lists excerpts from applicable regulations. The installation is responsible for complying with the cited portions of the regulations as found in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR). All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(6)(C)1.B Permit Duration

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

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

1) Recordkeeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Saint Louis County Air Pollution Control Program or Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) Semi-annual Monitoring Reports
      i) The permittee shall submit a semi-annual report of all required monitoring by: (1) October 1st for monitoring which covers the January through June time period, and (2) April 1st for monitoring which covers the July through December time period.
      ii) Each semi-annual monitoring report must identify any deviations from permit requirements since the previous report that have been monitored by the monitoring systems required under the permit, and any deviation from the monitoring, recordkeeping and reporting requirements of the permit.
      iii) These reports shall be submitted to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
   b) Supplemental Reports
      i) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      ii) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two (2) 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.

iii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iv) Any other deviations identified in the permit as requiring more frequent reporting than the annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

c) 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.

d) 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.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 under this rule.

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

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

10 CSR 10-6.065, §(6)(C)6. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that—

1) The applicable requirements are included and specifically identified in the permit; or

2) 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 the permit expressly includes that determination or a concise summary of it. The Statement of Basis constitutes the referenced determination of applicability.

The permit shield does not affect the following:
1) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders;
2) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance;
3) The applicable requirements of the acid rain program;
4) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information; or
5) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions of 10 CSR 10-6.065.

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

Operational flexibility (installation changes not requiring permit revisions). This installation 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 and 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 installation shall notify the Saint Louis County Air Pollution Control Program and Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, at least seven (7) days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally-enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice

standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, the permittee shall provide advance written notice to the Saint Louis County Air Pollution Control Program and Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the permitting authority shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and the permitting authority at least seven (7) days before the change is to be made. If less than seven (7) days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the administrator and the permitting authority 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

Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:

1) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
2) The permittee must provide written notice of the change to the Saint Louis County Air Pollution Control Program, 6121 North Hanley Road, Berkeley, MO 63134, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, Kansas 66219, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
3) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.065, §(6)(E)6.A Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Saint Louis County Air Pollution Control Program, the Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate

statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
3) The Saint Louis County Air Pollution Control Program, the Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.020(2)(R)11 Responsible Official

Bill Roper, Plant Manager, was established as the responsible official for Printpack, Inc. in the Title V renewal application, dated December 3, 2006. 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 Saint Louis County 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)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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.

VII. Attachments

Attachments follow.

ATTACHMENT A: Visible Emissions Walk-Through Form

This worksheet may be used to meet the recordkeeping requirements for Permit Condition PW001.

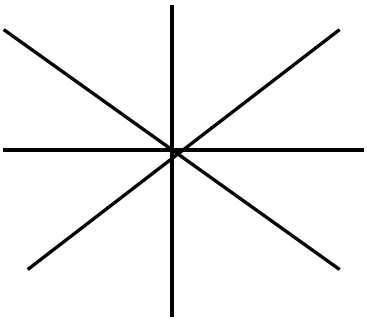
Date	Observer	Emission Unit	Visible Emissions	If visible emissions, was a Method 9 Observation performed?	Comments

ATTACHMENT B: Visible Emission Method 9 Observation Form

This worksheet may be used to meet the recordkeeping requirements for Permit Condition PW001.

Source Name_____
Address_____
Observation
Point_____
Stack Identification_____
Stack: Distance from_____Height_____
Temp_____%RH_____
Sky
Condition_____
Color of Emission_____

Quadrant: Draw symbols below in appropriate place to mark wind direction and speed, observer's location and sun location.



(Stack is at center)

Observer_____
Observer's Signature_____
Date_____Certification Date_____
Observer Began_____Ended_____

COMMENTS:
_____
_____
_____
_____

	0	15	30	45		0	15	30	45
0					41				
1					42				
2					43				
3					44				
4					45				
5					46				
6					47				
7					48				
8					49				
9					50				
10					51				
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16					57				
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28					69				
29					70				
30					71				
31					72				
32					73				
34					74				
35					75				
36					76				
37					77				
38					78				
39					79				
40					80				

STATEMENT OF BASIS

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

1) Part 70 Operating Permit Renewal Application, received December 22, 2006;
2) 2004-2008 Emissions Inventory Questionnaires;
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4) Saint Louis County Air Pollution Control Program Construction/Operating Permit #4008;
5) Saint Louis County Air Pollution Control Program Construction/Operating Permit #4366;
6) Saint Louis County Air Pollution Control Program Construction/Operating Permit #4525;
7) Saint Louis County Air Pollution Control Program Construction Permit #00832 (Operating Permit #4860);
8) Saint Louis County Air Pollution Control Program Construction/Operating Permit #5520;
9) Saint Louis County Air Pollution Control Program Construction/Operating Permit #7273;
10) Saint Louis County Air Pollution Control Program Construction/Operating Permit #7274;
11) Saint Louis County Air Pollution Control Program Construction/Operating Permit #7275;
12) Saint Louis County Air Pollution Control Program Construction/Operating Permit #7276;
13) Saint Louis County Air Pollution Control Program Construction/Operating Permit #7277;
14) Saint Louis County Air Pollution Control Program Construction/Operating Permit #7723;
15) Printpack AST Summary provided by Bari Miller January 26, 2009.

Printpack Above-Ground Storage Tank Summary*

Tank ID	Capacity (gal)	Contents	Approximate Date of Installation
1	10,000	Empty	1968
2	10,000	8515 Solvent	1968
3	10,000	SL-134 Solvent	1968
4	5,000	SL-162 Solvent	1968
5	5,000	SL-144 Solvent	1968
6	5,000	SL-NP Acetate Solvent	1968
7	10,000	SL-172 Solvent	1968
8	10,000	Empty	1968
9	10,000	SL-172 Solvent	1968
10	10,000	Empty	1968
11	10,000	Empty	1968
12	10,000	Empty	1968
14	10,000	Hazardous Waste	1968

*Above information represents contents at time of permit issuance. Contents in tanks are subject to change.

Applicable Requirements Included in the Operating Permit but Not in the Application
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 following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*
The presses, nor the extruders are particulate matter emission sources and are therefore not subject to this regulation.

The rail poly systems (EU0160-EU0170) and the trim removal system (EU0180) are not subject to permitting under 10 CSR 10-6.060 and are therefore exempt from this rule according to 10 CSR 10-6.400(1)(B)8.

Construction Permit Revisions
The following revisions were made to construction permits for this installation:

1) *Saint Louis County Air Pollution Control Program Construction Permits #4366:* This construction permit was modified to remove the reference to solvent recovery as the control device and add the RTO as the control device instead.

2) *Saint Louis County Air Pollution Control Program Construction Permits #4525 and #00832 (Operating Permit #4860):* These construction permits were modified to remove the reference to solvent recovery as the control device. This press and extruder are not controlled.

3) *Saint Louis County Air Pollution Control Program Construction Permit #4368, 5687, 5905, and 5980:* These construction permits set annual limits on pounds of VOC emissions, reams of substrate, or hours of operation, which were no longer necessary upon installation of the RTO. When the RTO is operated as conditioned, these presses and extruders have a potential to emit of less than these existing limits. The reference to solvent recovery as the control device was also removed, and the RTO was added as the control device instead. A condition was added to each of these permits to operate the RTO any time the presses or extruders are in use.

4) *Saint Louis County Air Pollution Control Program Construction Permit #5520:* This construction permit established a plant-wide permit limit of 526.2 tons per year. The installation and proper operation of the RTO reduced the installation's potential to emit to below 526.2 tons per year. Therefore, this condition was no longer necessary. This construction permit was also modified to remove the reference to solvent recovery as the control device and add the RTO as the control device instead.

5) *Saint Louis County Air Pollution Control Program Construction Permit #5519:* This construction permit for Extruder #2 was voided on January 22, 2009, because this unit is no longer capable of running primer and therefore will not have any VOC emissions.

6) *Saint Louis County Air Pollution Control Program Construction Permit #4368:* This construction permit was modified to require that the emissions from Extruder #3 be vented to the RTO only if an adhesive with a VOC content of greater than nine (9) percent by weight, as applied, is utilized.

NSPS Applicability
No 40 CFR Part 60 standards apply to this installation.

Subpart Dc, *Standards of Performance for Small Industrial/Commercial/Institutional Steam Generating Units*

This regulation does not apply to the boiler at this installation, EU-0010, because it was installed in 1974, which is prior to the NSPS date of 6/09/89.

Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984.*

This subpart is not applicable to any tanks on site. All tanks on site fall below the applicability threshold of 19,812.75 gallons.

Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*

This subpart does not apply to Printpack since the installation does not do publication printing.

MACT Applicability
No 40 CFR Part 63 standards apply to this installation.

Subpart KK, *National Emission Standards for the Printing and Publishing Industry*

This regulation is only applicable to major sources of HAP, of which Printpack is not. Subpart KK applies to printing and publishing installations that are major sources of HAPs. This installation is not a major source of HAPs. At one point in time, the installation did have the potential to emit greater than 10 tons of an individual HAP. However, in 1994, the extruder that was the source of the emissions was removed from service. This activity occurred prior to the date Subpart KK was proposed (03/14/95).

Subpart JJJJ, *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating*, is applicable only to major sources of HAPs. Printpack is not a major source of HAPs as explained above for Subpart KK.

NESHAP Applicability
40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition sections of the subpart, which makes the subpart applicable to all sources. It is included as a core permit requirement.

Other Regulatory Determinations
10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*

In accordance with 10 CSR 10-6.405 (1)(E), the 24 mmBtu/hr Natural Gas Boiler w/ Propane backup, the installation is exempt from this rule if all of the installation's applicable units are

fueled only by landfill gas, propane, natural gas, fuel oils #2 through #6 (with less than one and two-tenths percent (1.2%) sulfur), or other gases (with hydrogen sulfide levels less than or equal to four (4) parts per million volume

10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*
In accordance with 10 CSR 10-5.300(1)(D)1.B, EU0090, Controlled Parts Washers, are exempt from this regulation because they meet the emission control requirements of 10 CSR 10-5.340.

10 CSR 10-5.455, *Control of Emissions from Solvent Cleanup Operations*
This installation is not subject to this rule according to 10 CSR 10-5.455(C)8.E.

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 (1) 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 (1) 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 Saint Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program Enforcement Section '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 Saint Louis County Air Pollution Control Program and Missouri Department of Natural Resources Air Pollution Control Program Enforcement Section a schedule for achieving compliance for that regulation(s).

Reviewed by:

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Jason Dickneite
Environmental Engineer