INTERMEDIATE STATE
PERMIT TO OPERATE

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

Intermediate Operating Permit Number:  OP2017-009
Expiration Date:  FEB 1 7 2022
Installation ID:  221-0008
Project Number:  2014-05-074

Installation Name and Address
Red Wing Shoe Company
1 Red Wing Drive
Potosi, MO 63664
Washington County

Parent Company’s Name and Address
Red Wing Shoe Company
314 Main Street
Red Wing, MN 55066

Installation Description:
The Red Wing Shoe Company operates a boot and shoe manufacturing plant in Potosi, Missouri. The plant has been in operation since 1994. The installation has the potential to be a major source for volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs).

Prepared by:
David Buttig
Operating Permit Unit

Director or Designee
Department of Natural Resources
FEB 1 7 2017
Effective Date
# Table of Contents

## I. INSTALLATION EQUIPMENT LISTING

- EMISSION UNITS WITH SPECIFIC LIMITATIONS ................................................................. 3
- EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS ...................................................... 3

## II. PLANT WIDE EMISSION LIMITATIONS

- Permit Condition PW001 ................................................................................................. 4
  - 10 CSR 10-6.065 Operating Permits ............................................................................... 4
  - 10 CSR 10-6.065(5)(C)1.A.(VI) Voluntary Limitation(s) ....................................................... 4
- Permit Condition PW002 ................................................................................................. 4
  - 10 CSR 10-6.065 Operating Permits ............................................................................... 4
  - 10 CSR 10-6.065(5)(C)1.A.(VI) Voluntary Limitation(s) ....................................................... 4

## III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS

- Permit Condition 1 ........................................................................................................... 6
  - 10 CSR 10-6.060 Construction Permits Required ............................................................. 6
  - Construction Permit 032003-035, Issued March 4, 2003 .................................................. 6
- Permit Condition 2 ........................................................................................................... 7
  - 10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants ......................... 7

## IV. CORE PERMIT REQUIREMENTS

- ........................................................................................................................................... 8

## V. GENERAL PERMIT REQUIREMENTS

- ........................................................................................................................................... 13

## VI. ATTACHMENTS

- ATTACHMENT A ............................................................................................................ 18
  - Plant-Wide VOC Emissions Tracking Record ............................................................... 18
- ATTACHMENT B-1 ........................................................................................................... 19
  - Monthly Individual HAPs Tracking Record ................................................................. 19
- ATTACHMENT B-2 ........................................................................................................... 20
  - Monthly Combined HAPs Tracking Record ................................................................. 20
- ATTACHMENT C ............................................................................................................ 21
  - Construction Permit No. 032003-035 – VOC Compliance Worksheet ......................... 21
- ATTACHMENT D ............................................................................................................ 22
  - Construction Permit No. 032003-035 – Dimethyl Formamide (DMF) Compliance Worksheet ............................................................... 22
I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01</td>
<td>Two (2) Urethane Machines U1 &amp; U2</td>
</tr>
<tr>
<td>N/A</td>
<td>Cliff Steel Boiler, 7.071 MMBtu/hr, 1963</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

- Lasting Plant
- Sole Plant
- Fitting Plant
- Finishing Plant Sole Polishing
- Cleanup
- Cliff Steel Boiler, 7.071 MMBtu/hr, 1963
- Welt Operation (EU-02)
  - American Outsole Chlorination Machine (EU-02A)
  - Shaffer Outsole Machine (EU-02B)
  - Garfas Outsole Cementer (EU-02C)
  - American Outsole Cementer (EU-02D)
  - Duo Fast Staple Gun (EU-02E)
  - Rex Assembly Machine (EU-02F)
  - American and Shoen Forepart Lasting Machine (EU-02G)
  - American Wire Staple Lasting Machine (EU-02H)
  - Brusta Sewed Seat Fastener (EU-02I)
  - Upper Tow Trimming Machine (EU-02J)
  - Goodyear Inseam Stitch Machines (EU-02K)
  - Goodyear Inseam Trier (EU-02L)
  - Welt Beat Machine (EU-02M)
  - Cork Bottom Filling Machine (EU-02N)
  - Compo Welt Cementer (EU-02O)
  - American Sole Attaching Machine (EU-02P)
  - United Rough Rounding Machine (EU-02Q)
  - British High Speed Stitcher (EU-02R)
  - American Sole Attaching Machine (EU-02S)
  - Continental Trier (EU-02T)
- Gusbi Machine (EP-06)
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

<table>
<thead>
<tr>
<th>Permit Condition PW001</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065</td>
</tr>
<tr>
<td>Operating Permits</td>
</tr>
<tr>
<td>10 CSR 10-6.065(5)(C)1.A.(VI) Voluntary Limitation(s)</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
The Permittee shall emit into the atmosphere less than 95 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

**Monitoring/Recordkeeping:**
The permittee shall maintain an accurate record of emissions of VOCs emitted into the atmosphere from this installation. The permittee shall record the monthly and rolling 12-month totals of the VOC emissions from this installation. The 12-month rolling total shall include the startup, shutdown, and malfunction emissions from all emission units. Example form is attached as Attachment A (Plant-Wide Emissions Tracking Record). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the VOC emission limitation (less than 95 tons in any consecutive 12-month period of VOCs).

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.
2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

<table>
<thead>
<tr>
<th>Permit Condition PW002</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065</td>
</tr>
<tr>
<td>Operating Permits</td>
</tr>
<tr>
<td>10 CSR 10-6.065(5)(C)1.A.(VI) Voluntary Limitation(s)</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
1) The permittee shall emit less than 9.5 tons of any individual HAP in any consecutive 12-month period; and
2) The permittee shall emit less than 24 tons of any combination of HAPs in any consecutive 12-month period.
**Monitoring/Recordkeeping:**
The permittee shall maintain an accurate record of emissions of HAPs emitted into the atmosphere from this installation. The 12-month rolling total shall include the startup, shutdown, and malfunction emissions from all emission units. Example forms are attached as Attachment B-1 and B-2. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the HAPs emission limitation (less than 9.5 tons in any consecutive 12-month period of any individual HAP or less than 24 tons in any consecutive 12-month period of any combination of HAPs).

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.
2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).
III. Emission Unit Specific Emission Limitations

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

<table>
<thead>
<tr>
<th>Permit Condition 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.060 Construction Permits Required</td>
</tr>
<tr>
<td>Construction Permit 032003-035, Issued March 4, 2003</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01</td>
<td>Two (2) Urethane Machines (U1 &amp; U2): Construction Date U1 (2001) &amp; U2 (1999); MHDR = 250/hr each</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
1) Red Wing Shoe Company shall emit less than forty (40) tons of Volatile Organic Compounds (VOCs) from the Urethane Machines (U1 & U2) in any consecutive twelve (12) month period. [Construction Permit 032003-035: Special Condition 2A]
2) Red Wing Shoe Company shall not emit dimethyl formamide (DMF) in excess of 1.0 ton from the Urethane Machines (U1 & U2) in any consecutive twelve (12) month period. [Construction Permit 032003-035: Special Condition 2B]

**Operational Limitation/Equipment Specification:**
Red Wing Shoe Company shall keep the solvents and cleaning solutions in sealed containers whenever the materials are not in use. Red Wing Shoe Company shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment. [Construction Permit 032003-035: Special Condition 3]

**Monitoring/Recordkeeping:**
Attachment C and Attachment D or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitations (Special Conditions 2A and 2B of Construction Permit 032003-035). Red Wing Shoe Company shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in these urethane machines. [Construction Permit 032003-035: Special Condition 2C]

**Reporting:**
1) Red Wing Shoe Company shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition 2C of Construction Permit 032003-035 indicate that the source exceeded the emission limitations (Special Conditions 2A & 2B of Construction Permit 032003-035). [Construction Permit 032003-035: Special Condition 2D]
2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

<table>
<thead>
<tr>
<th>Permit Condition 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>Cliff Steel Boiler, 7.071 MMBtu/hr, 1963</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 40%.

**Monitoring/Record Keeping:**
None-See Statement of Basis-Other Regulatory Determinations.

**Reporting:**
The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).
IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent
and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

**10 CSR 10-6.060 Construction Permits Required**
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

**10 CSR 10-6.065 Operating Permits**
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

**10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**
1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation’s emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

**10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.
10 CSR 10-6.150  Circumvention

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

10 CSR 10-6.165  Restriction of Emission of Odors

This is a State Only permit requirement.

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

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

Emission Limitation:

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:

   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180  Measurement of Emissions of Air Contaminants

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.
10 CSR 10-6.220  Restriction of Emission of Visible Air Contaminants

**Emission Limitation:**
The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

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 at an installation:
   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.

40 CFR Part 82  Protection of Stratospheric Ozone (Title VI)

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 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR Part 82.
V. General Permit Requirements

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

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

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal

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

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources’ personnel upon request.

2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

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

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

f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.

6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None.
10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I)
– (III) and (V) – (VI) Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
b) That the installation was being operated properly,
c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(5)(C)5 Off-Permit Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Except as noted below, the permittee may make any change in its permitted installation’s operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:</td>
</tr>
<tr>
<td>a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.</td>
</tr>
<tr>
<td>b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This 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</td>
</tr>
<tr>
<td>c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 CSR 10-6.020(2)(R)12 Responsible Official</th>
</tr>
</thead>
<tbody>
<tr>
<td>The application utilized in the preparation of this permit was signed by John Smith, Director of Risk Management. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.</td>
</tr>
</tbody>
</table>
10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire;
   or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.


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

VI. Attachments

Attachments follow.
## Attachment A

Plant-Wide VOC Emissions Tracking Record

This sheet covers the month of __________________ in the year __________________.

Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Material Used (Name, Type)</th>
<th>Amount of Material Used (Include Units)</th>
<th>Density (lb/gal)</th>
<th>VOC Content (Weight %)</th>
<th>VOC Emissions (Tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(e) Total VOC Emissions Calculated for this Month in Tons:

(d) 12-Month VOC Emissions Total from Previous Month's Attachment A, in Tons:

(e) Monthly VOC Emissions Total (b) from Previous Year's Attachment A, in Tons:

(f) Current 12-month Total of VOC Emissions in Tons: \[(b) + (c) - (d)\]

Instructions: Choose appropriate VOC calculation method for units reported:

(a) 1) If usage is in tons - \[\text{Column 2} \times \text{Column 4} = \text{Column 5}\];
    2) If usage is in pounds - \[\text{Column 2} \times \text{Column 4} \times 0.0005 = \text{Column 5}\];
    3) If usage is in gallons - \[\text{Column 2} \times \text{Column 3} \times \text{Column 4} \times 0.0005 = \text{Column 5}\].

(b) The highest density and VOC content values reported in the MSDS for each material shall be used.

(c) Summation of [Column 5] in Tons;

(d) 12-Month VOC emissions total (e) from last month's Attachment A, in Tons;

(e) Monthly VOC emissions total (b) from previous year's Attachment A, in Tons;

(f) Calculate the new 12-month VOC emissions total.

A 12-Month VOC emissions total (e) of less than 95.0 tons indicates compliance.
**Attachment B-1**  
Monthly Individual HAPs Tracking Record

HAP Name: ______________________________ CAS No.: __________________

This sheet covers the month of ______________________ in the year __________________.

*Copy this sheet as needed*

<table>
<thead>
<tr>
<th>Column 1 (a)</th>
<th>Column 2 (b)</th>
</tr>
</thead>
</table>
| **List materials from Attachment B-2 which emit this specific HAP**  
  (Name, Type) | **HAP emissions from Attachment B-2**  
  ([Column 5]  
  (in Tons)) |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(c) Total HAP Emissions Calculated for this Month, in Tons:

(d) 12-Month HAP Emissions Total (f) from Previous Month's  
Attachment B-1, in Tons:

(e) Monthly HAP Emissions Total (c) from Previous Year's  
Attachment B-1, in Tons:

(f) Current 12-month Total HAP Emissions in Tons:

\[(c) + (d) - (e)\];

**INSTRUCTIONS:**  
(a) Individually list each material which emits this specific HAP;  
(b) Record the amount of HAP emissions already calculated for Attachment B-2 in [Column 5] in Tons;  
(c) Summation of [Column 5] in Tons;  
(d) Record the previous 12-Month individual HAP emission total (f) from last month's Attachment B-1, in Tons;  
(e) Record the monthly HAP emission total (c) from previous year's Attachment B-1, in Tons;  
(f) Calculate the new 12-month individual HAP emissions total.  

A 12-Month individual HAP emissions total of less than 9.5 tons indicates compliance.
**Attachment B-2**

**Monthly Combined HAPs Tracking Record**

This sheet covers the month of _______________ in the year ________________.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3 (b)</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used, (Name, HAP CAS #)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lb/gal)</td>
<td>HAP Content (Weight %)</td>
<td>HAP Emissions (Tons)</td>
</tr>
</tbody>
</table>

(c) Total HAP Emissions Calculated for this Month in Tons:

(d) 12-Month HAP Emissions Total from Previous Month’s Attachment in Tons:

(e) Monthly HAP Emissions Total (b) from Previous Year’s Attachment in Tons:

(f) Current 12-month Total of HAP Emissions in Tons: \[(b) + (c) - (d)\]

**INSTRUCTIONS:** Choose appropriate HAP calculation method for units reported:

(a) 1) If usage is in tons - \([\text{Column 2}] \times [\text{Column 4}] = [\text{Column 5}]\);
   2) If usage is in pounds - \([\text{Column 2}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}]\);
   3) If usage is in gallons - \([\text{Column 2}] \times [\text{Column 3}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}]\);

(b) The highest density value reported in the MSDS for each material shall be used.

(c) Summation of [Column 5] in Tons;

(c) 12-Month HAP emissions (e) from last month's Attachment B-2 in Tons;

(d) Monthly HAP emissions total (b) from the previous year's Attachment B-2 in Tons;

(e) Calculate the new 12-month combined HAPs emissions total.

A 12-Month HAP emissions total (e) of less than 24.0 tons indicates compliance.
Attachment C
Construction Permit No. 032003-035 – VOC Compliance Worksheet

This worksheet covers the period from                      to                      (month/year)  (month/year)

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2(a)</th>
<th>Column 3 (b)</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal))</td>
<td>VOC Content (Weight %)</td>
<td>VOC Emissions (tons)</td>
</tr>
</tbody>
</table>

(c) Total DMF Emissions Calculated for this Month in Tons:
(d) 12-Month DMF Emissions Total from Previous Month's Worksheet, in Tons:
(e) Monthly DMF Emissions Total (b) from Previously Year's Worksheet, in Tons:
(f) Current 12-month Total of DMF Emissions in Tons: [(b) + (c) - (d)]

Instructions: Choose appropriate DMF calculation method for units reported:
(a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
    2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
    3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
(b) The highest density value reported in the MSDS for each material shall be used.
(c) Summation of [Column 5] in Tons;
(d) 12-Month VOC emissions total (e) from last month's Worksheet C, in Tons;
(e) Monthly VOC emissions total (b) from previous year's Worksheet C, in Tons;
(f) Calculate the new 12-month VOC emissions total.

A 12-Month VOC emissions total (e) of less than 40.0 tons indicates compliance.
Attachment D
Construction Permit No. 032003-035 – Dimethyl Formamide (DMF) Compliance Worksheet

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with Permit Number 032003-035 DMF emissions limitation (Permit Condition 1).

This worksheet covers the period from _______ to _______.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2(a)</th>
<th>Column 3 (b)</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used</td>
<td>Amount of</td>
<td>Density</td>
<td>DMF Content</td>
<td>DMF Emissions</td>
</tr>
<tr>
<td>(Name, Type)</td>
<td>Material Used</td>
<td>(lbs/gal)</td>
<td>(Weight %)</td>
<td>(tons)</td>
</tr>
<tr>
<td></td>
<td>(Include Units)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(c) Total DMF Emissions Calculated for this Month in Tons:
(d) 12-Month DMF Emissions Total from Previous Month's Worksheet, in Tons:
(e) Monthly DMF Emissions Total (b) from Previously Year's Worksheet, in Tons:
(f) Current 12-month Total of VOC Emissions in Tons: [(b) + (c) - (d)]

Instructions: Choose appropriate VOC calculation method for units reported:
(a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
    2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
    3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
(b) The highest density value reported in the MSDS for each material shall be used.
(c) Summation of [Column 5] in Tons;
(d) 12-Month DMF emissions total (c) from last month's Worksheet D, in Tons;
(e) Monthly VOC emissions total (b) from previous year's Worksheet D, in Tons;
(f) Calculate the new 12-month DMF emissions total. A 12-Month DMF emissions total (e) of less than 1.0 ton indicates compliance.
STATEMENT OF BASIS

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

Installation Description
The Red Wing Shoe Company operates a boot and shoe manufacturing plant in Potosi, Missouri. The plant has been in operation since 1994.

The installation has the potential to be a major source for volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs). However, the installation, in their Intermediate Operating Permit, is choosing to limit the plant wide emissions to less than 95 tons per year for VOCs, less than 9.5 tons per year for each HAP, and less than 24 tons per year total HAPs, on a 12 month rolling average.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>2.54</td>
</tr>
<tr>
<td>NOₓ</td>
<td>3.02</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>0.229</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>0.229</td>
</tr>
<tr>
<td>SOₓ</td>
<td>0.0181</td>
</tr>
<tr>
<td>VOC</td>
<td>333.75</td>
</tr>
<tr>
<td>MDI</td>
<td>2.57E-05</td>
</tr>
</tbody>
</table>

1 Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Volatile Organic Compounds(VOC)</td>
<td>16.79</td>
<td>18.02</td>
<td>16.54</td>
<td>17.25</td>
<td>23.02</td>
</tr>
</tbody>
</table>
Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Intermediate Operating Permit Application, received May 27, 2014;
2) 2015 Emissions Inventory Questionnaire, received March 01, 2016;
3) Construction Permit #102012-008; and

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

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

10 CSR 10-6.405, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*
   The pipeline natural gas fueled 7.071 MMBtu per hour boiler is subject to the requirements of this rule. However, per 10 CSR 10-6.405(1)(C) emission units fueled by natural gas are deemed to always be in compliance with this regulation and therefore has not been included as a Permit Condition.

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and*
10 CSR 10-6.250, *Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements*
   In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.
10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
All combustion equipment at the installation uses pipeline grade natural gas. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels is exempt from the requirements of this rule.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*
The natural gas boiler is exempt from this regulation because it is fueled exclusively by natural gas per 10 CSR 10-6.261(1)(A).

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

1) Construction Permit 032003-035, Issued March 4, 2003
   Construction Permit 032003-035 allows for three (3) urethane machines (U1, U2, & U5) to operate. In Construction Permit 102012-008, Red Wing Shoe Company has removed urethane machine U5 from the facility.

**New Source Performance Standards (NSPS) Applicability**
None

**Maximum Achievable Control Technology (MACT) Applicability**
Part 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Residential Boilers Area Sources*
The natural gas boiler is not subject to this regulation because it is classified as a gas-fired boiler by definition in this rule per §63.11195(e).

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**
In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.
Other Regulatory Determinations
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
Monitoring and recordkeeping requirements are not applied to the natural gas combustion units because the potential PM emissions are less than 0.5 lb/hr. When these units are properly maintained and operated, opacity emissions are not expected.

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

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

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

A draft of the Red Wing Shoe Company’s Intermediate Operating Permit was placed on public notice on September 17, 2014, by the Missouri Department of Natural Resources (MDNR). Comments were received on September 30, 2014, from Leslye Werner, Acting Chief in the Air Permitting and Compliance Branch of the Environmental Protection Agency Region 7. The two (2) comments are presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following.

EPA Comment #1:

The introductory banners for permit condition PW001 and permit condition PW002 contain an incorrect regulatory reference citation. The correct voluntary limitation regulatory citation is as detailed in the voluntary limitations discussion on page 1 of the Statement of Basis. EPA suggests MDNR replace the regulatory reference citation in PW001 and PW002 with 10 CSR 10-6.065(5)(C)1.A.(VI).

Missouri Air Pollution Control Program Response to EPA Comment #1:

The citations for PW001 and PW002 have been corrected in the operating permit. The introductory banners now read:

10 CSR 10-6.065
Operating Permits
10 CSR 10-6.065(5)(C)1.A.(VI) Voluntary Limitation(s)

EPA Comment #2:

Permit condition PW001 establishes a voluntary emission limitation of less than 95 tons of volatile organic compounds (VOCs) for the entire installation in any consecutive 12-month period. PW001 also approves the use of Attachment A (Plant-Wide Emission Tracking Record) to accurately demonstrate compliance with the 95 ton per 12-month period VOC voluntary limit. Additionally, permit condition PW002 establishes voluntary emission limitations of less than 9.5 tons of any individual hazardous air pollutant (HAP) in any 12-month consecutive period and less than 24 tons of any combination of hazardous air pollutants (HAPs) in any 12-month consecutive period. PW002 also approves the use of Attachments B-1 and B-2 to accurately demonstrate compliance with the HAP voluntary 9.5/24 tons per 12-month consecutive period. However, both permit condition PW001 and PW002 fail to ensure that the VOC; the individual HAP; and the total combined HAP emissions, respectively, will be below their established voluntary limits. While the draft operating permit intends to restrict VOC and HAP below the individual voluntary limits, these limits are not enforceable as a practical matter.

To effectively limit Red Wing's VOC, individual HAP and total HAP emissions to less than 95, 9.5 and 24 tpy, respectively, as specified, the VOC, individual and total HAP emission limits of PW001 and PW002 must apply at all times to all actual emissions, and all actual VOC, individual and total HAP emissions must be considered in determining compliance with the respective limits. The draft permit for Red Wing states that "the total of all VOCs, the total of all HAPs emissions and any individual HAP emissions from the facility, shall not equal or exceed 95 tons per year; 9.5 tons per year and 10 tons per year, respectively, on any rolling twelve-month (12 month) period." However, the draft permit does not specify how the facility's VOC; individual HAP; and total HAP emissions shall be determined or measured for assessing compliance with these VOC: individual HAP; and total HAP emission limits, and it is unclear whether all actual VOC;
individual HAP; and total HAP emissions must be considered in determining compliance with these limits, including emissions during startups and shutdowns; other non-startup/shutdown operating conditions referenced in the permit, such as periods of "malfunction" or "upset conditions."

The EPA notes that the draft permit does contain a condition in PW001 and PW002 providing that the "permittee shall calculate and record the total of all VOCs; total of all HAPs; and all individual HAP emissions from the facility on a monthly and rolling twelve-month (12-month) basis. However, the draft permit does not specify how the total VOCs; total HAPs; and individual HAP emissions shall be calculated for purposes of these two conditions or what information such calculations would be based upon. Nor does the draft permit specifically connect the calculations to determining compliance with the VOC; individual HAP; and total HAP emission limits. In addition, these conditions do not clearly provide that all actual source-wide VOC; total HAP and individual HAP emissions should be considered in determining compliance with the VOC; total HAP and individual HAP emission limits and do not clearly state that emissions during startup, shutdown, or other non-startup/shutdown operating conditions referenced in the permit (such as malfunction or upset) must be included in determining compliance with those limits. In addition, PW001 and PW002 do not clearly state that emissions during startup and shutdown must be included in determining compliance with the VOC; total HAP; and individual HAP emission limits.

Moreover, as defined for purposes of determining the potential-to-emit (PTE) of a stationary source of VOCs and HAPs, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Thus, emission for all emission units that are part of the source's physical and operational design (entire installation) must be included in calculating PTE for purposes of determining VOC and HAP voluntary limitation compliance, including emission units that have been designated as without limitations and any designated insignificant activities. Similarly, EPA has previously explained that when a source accepts a source-wide limit for a pollutant, all actual emission of that pollutant from the source must be considered in determining compliance with the limit.

EPA recommends MDNR revise PW001 and PW002 in the Intermediate State Permit to Operate for Red Wing Shoe Company-Potosi to ensure the source-wide VOCs; the source-wide total HAPs and individual HAP emission limits of 95 tons per 12-month period; 24 tons per 12-month period and 9.5 tons per 12-month period, respectively, are enforceable. MDNR should clarify in the operating permit that those limits apply at all times to all actual source-wide VOC; total HAP and individual HAP emissions and that all actual VOC; total HAP and individual HAP emission must be considered in determining compliance with those limits. MDNR should also make any changes or clarifications necessary to the measures for determining compliance with those limits, including monitoring, recordkeeping, and reporting provisions, to ensure that those limits are enforceable as a practical matter. In identifying in the operating permit the measures for determining compliance with the VOC; individual HAP; and total HAP emission limits, MDNR should specify how the actual annual total VOC; total HAP and individual HAP emissions will be calculated, including what, if any, emission rates or emission factors would be used and how calculations using such rates would ensure that actual annual total VOC; total HAP and individual HAP emissions remain below the respective 95; 24 and 9.5 ton per year limits.

Missouri Air Pollution Control Program Response to EPA Comment #2:

The description of Emission units without specific limitations has been changed to read as the following: "The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. However any pollutants emitted by these sources are still subject to Plant
Wide Limitations outlined in Section II of this permit.” This statement will further clarify that all emission units at a facility are held to the plant wide emission limitations in Section II.

The tracking sheets Attachment A, B-1 and B-2 have been modified in order to give an explanation on how the emissions should be calculated in order to show compliance with the VOC and HAP emission limitations.
FEB 17 2017

Mr. John Smith
Red Wing Shoe Company
1 Red Wing Drive
Potosi, MO 63664

Re: Red Wing Shoe Company, 221-0008
Permit Number: OP2017-009

Dear Mr. Smith:

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

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

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

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:dbj

Enclosures

c: Southeast Regional Office
PAMS File: 2014-05-074