

PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2018-022
Expiration Date: FEB 13 2023
Installation ID: 071-0029
Project Number: 2016-12-020

Installation Name and Address

RTI Advanced Forming, Inc.
1701 W. Main Street
Washington, MO 63090
Franklin County


Parent Company's Name and Address

Arconic, Inc.
201 Isabella Street
Pittsburgh PA, 15212

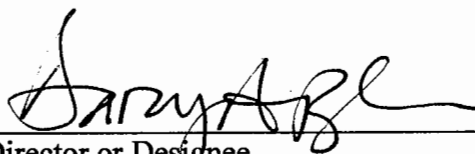
Installation Description:

This installation produces specially formed titanium sheet and plate products for a wide range of commercial applications. There are three (3) Pickle Lines which use a mixture of hydrofluoric acid and nitric acid to chemically etch and clean the titanium sheets prior to further processing. The pickle lines are equipped with an acid fume scrubber to control hydrogen fluoride emissions. Hot forming of titanium sheets is conducted using electrically-heated ovens and presses. A mold release coating is spray applied to keep sheets from sticking to molds. Other operations include storage tanks, grinding, water jet cutter, parts cleaning, space heating and a 170 hp diesel emergency generator.

This facility is a major source of Hydrogen Fluoride and is a minor source of all other criteria pollutants. This facility is subject to the NESHAP for Aerospace Manufacturing and Rework Facilities.



Prepared by
Jill Wade, P.E.
Operating Permit Unit



Director or Designee
Department of Natural Resources
FEB 13 2018

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EG-1	Emergency Generator
PCS-1	Process Coatings and Solvents
PL-A	Pickle Line A
PL-B	Pickle Line B
PL-C	Pickle Line C

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<u>Description of Emission Source</u>
PC-1 Parts Cleaners
WWT Wastewater Treatment
EP-1 Upper Grinding
LG-1 Lower Grinding
TG-1 Timesaver Grinding
SC-1 Sandblast Cabinet
WJ-1 Water Jet Cutter
NG-1 Natural Gas Combustion Sources (Space Heaters)
CS-1 Carpenter Shop

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. This section applies to regulations that apply on an entire-installation wide basis. The following general conditions apply to all units contained in this permit, unless stated otherwise.

None.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001 10 CSR 10-6.070 New Source Performance Standards 40 CFR Part 60 Subpart IIII Standards of Performance for Compression Ignition Stationary Internal Combustion Engines

Emergency Generator	
Emission Unit	Description
EG-1	Emergency Generator: 170 HP diesel generator; 0.43 MMBtu/hr; Manufacturer: Kohler; Constructed 7/1/2012

Emission Limitations:

2007 model year and later emergency Compression Ignition (CI) Internal Combustion Engines (ICE)-with a displacement of less than 30 liters per cylinder

1. The permittee must comply with the emission standards for new non-road CI engines in §60.4202(a)(2), for all pollutants, for the same model year and maximum engine power: [§60.4205(b)]
 - a) For EG-1: Exhaust emissions from non-road engines(Tier 3) shall not exceed the following limits from Table 1 of 40 CFR Part 89.112:
 - i. 4.0 g/kW-hr of NMHC + NOx;
 - ii. 3.5 g/kW-hr of CO;
 - iii. 0.2 g/kW-hr of PM.
2. The permittee must operate and maintain the engines so as to achieve the emission standards over the entire life of the engine. [§60.4206]
3. The General Provisions of 40 CFR 60.1 through 19 apply as indicated in Table 8 of 40 CFR 60, Subpart IIII except that the permittee is not required to submit initial notification. [§60.4218 & §60.4214(b)]

Operational Limitation:

The permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for non-road diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted: [§60.4207(b)]

1. Sulfur content: 15 parts per million (ppm) maximum. [§80.510(b)(1)(i)]
2. Cetane index or aromatic content, as follows: [§80.510(b)(2)]
 - a) A minimum cetane index of 40; or [§80.510(b)(2)(i)]
 - b) A maximum aromatic content of 35 volume percent. [§80.510(b)(2)(ii)]

Monitoring:

1. The permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions. [60.4211(a), (c)]

Continuous Compliance:

1. The permittee must operate and maintain the engine to achieve required emission standards over the entire life of the engine. [§60.4206]
2. The permittee must operate and maintain the engine (and any control device) according to the manufacturer's emission-related written instructions. [§60.4211(a)]
3. Engine must be certified to the applicable emission standards by the manufacturer and the engine must be installed and configured according to the manufacturer's emission-related specifications [§60.4211(c)]
4. The permittee must change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
5. The permittee must meet the requirements of 40 CFR Parts 89, 94 and/or 1068, as applicable to these engines. [§60.4211(a)(3)]
6. The permittee must operate the engine within the time limitations in §60.4211(f)(1) through (3) to maintain the engine's status as an emergency engine. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4211(f)(1), (f)(2)(i) and (f)(3), is prohibited. If the permittee does not operate the engine according to the requirements in §60.4211(f)(1), (f)(2)(i) and (f)(3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [§60.4211(f)]
 - a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
 - b) The permittee may operate the emergency stationary ICE for any combination of the purposes specified in paragraphs §60.4211 (f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph §60.4211 (f)(2)(i). [§60.4211(f)(2)]
 - i. Emergency stationary ICE may be operated 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. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The permittee may petition the director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4211(f)(2)(i)]
 - c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §60.4211(f)(2). Except as provided in §60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4211(f)(3)]

- i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
[§60.4211(f)(3)(i)]
 - (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [§60.4211(f)(3)(i)(A)]
 - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§60.4211(f)(3)(i)(B)]
 - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§60.4211(f)(3)(i)(C)]
 - (D) The power is provided only to the facility itself or to support the local transmission and distribution system. [§60.4211(f)(3)(i)(D)]
 - (E) The permittee identifies and records the entity that dispatches the engine and the specific North American Electric Reliability Corporation (NERC), regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§60.4211(f)(3)(i)(E)]

Reporting:

- 1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
- 2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.
- 3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

PERMIT CONDITION 002 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart GG National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities
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Process Coatings	
Emission Unit	Description
PCS-1	Process Coatings: Mold Release Applications – Spray Booth PS-1 (existing source) and small trial booth (new source)

Emissions/Operational Limitations:

- 1. The permittee shall conduct the handling and transfer of specialty coatings to or from containers, tanks, vats, vessels and piping systems in such a manner that minimizes spills. [§63.745(b)]

2. The permittee shall limit organic HAP emissions from mold release application to an organic HAP content level of no more than 780 g/L (6.5 lb/gallon). [§63.745(c)(5)]
3. The permittee shall limit VOC emissions from mold release application to a VOC content level of no more than 780 g/L (6.5 lb/gallon). [§63.745(c)(6)]
4. The permittee shall comply with the VOC and HAP limits by using specialty coatings with HAP and VOC contents levels equal to or less than the limit. [§63.745(e)(1)]
5. The permittee shall apply the specialty coatings using one or more of the following application techniques [§63.745(f)(1)(i)-(v)]:
 - a) High volume low pressure (HVLP) spraying;
 - b) Electrostatic spray application;
 - c) Airless spray application;
 - d) Air-assisted airless spray application; or
 - e) Any other coating spray application methods that achieve emission reductions or a transfer efficiency equivalent to or better than HVLP spray, electrostatic spray, airless spray or air-assisted airless spray application methods as determined according to the requirements in §63.750(i).
6. All coating spray application devices used to apply specialty coatings shall be operated according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Spray application equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP spray, electrostatic spray, airless spray or air-assisted airless spray application techniques. [§63.745(f)(2)]
7. The permittee shall conduct the handling and transfer of waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills and shall store all waste that contains organic HAP in closed containers. [§63.748(a)(1)-(2)]

Compliance Determination:

1. The permittee shall be in compliance with the requirements of this subpart upon startup of the small trial booth and before December 7, 2018 for all other existing affected sources. [§63.749(a)(3)]
2. The permittee is considered in compliance when the following conditions (specified in §63.749(a)(4)(i)-(iv) and §63.749(e)) are met: [§63.749(a)(4)]
 - a) For all uncontrolled specialty coatings, all values of H_i and H_a as determined using the procedures specified in §63.750(c) and (d) are less than or equal to the HAP content limits specified in **Emissions/Operational Limitations** 2. And all values of G_i and G_a as determined using the procedures specified in §63.750(e) and (f) are less than or equal to the VOC content limits specified in **Emissions/Operational Limitations** 3. The compliance demonstration for a specialty coating may be based on the organic HAP content or the VOC content of the coating; demonstrating compliance with both the HAP content limit and the VOC content limit is not required. If a specialty coating contains HAP solvents that are exempt from the definition of VOC in §63.741 and 40 CFR 51.100, then the HAP content must be used to demonstrate compliance;
 - b) The permittee uses an application technique specified in §63.745(f)(1)(v) through (f)(1)(iv) or an alternative application technique as allowed under §63.745(f)(1)(v), such that the emissions of both organic HAP and VOC for the implementation period of the alternative application method are less than or equal to the emissions generated using HVLP spray, electrostatic spray, airless spray, or air-assisted airless spray application methods, as determined using the procedures specified in §63.750(i);

- c) The permittee operates all application techniques in accordance with the manufacturer's specifications or locally prepared operating procedures.

Test Methods and Procedures:

The permittee shall follow applicable test methods and procedures as required by §63.750(c) and §63.750(e).

Recordkeeping Requirements:

1. The permittee shall fulfill all recordkeeping requirements specified in §63.10(a), (b), (d), and (f), except §63.10(b)(2)(i), (iv) and (v). The permittee must also record and maintain according to §63.10(b)(1) the following information: [§63.752(a)(1)-(3)]
 - a) In the event that the affected unit fails to meet an applicable standard, record the number of failures. For each failure record the date, time and duration of each failure;
 - b) For each failure to meet an applicable standard, record and retain a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions;
 - c) Record actions taken to minimize emissions in accordance with §63.743(e), and any corrective actions taken to return the affected unit to its normal or usual manner of operation.
2. The permittee shall record the following information as appropriate: [§63.752(c)(1)-(2)]
 - a) The name and VOC content as received and as applied of each specialty coating used at the facility.
 - b) For specialty coatings that meet the organic HAP and VOC content limits without averaging:
 - i. The mass of organic HAP emitted per unit volume of coating as applied (less water) (H_i) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G_i) for each coating formulation within each coating category used each month (as calculated using the procedures specified in §63.750(c) and (e));
 - ii. All data, calculations and test results (including EPA Method 24 results) used in determining the values of H_i and G_i ; and
 - iii. The volume (gal) of each coating formulation within each coating category used each month.
3. If the permittee is using coating manufacturer's supplied data to demonstrate compliance with the applicable organic HAP or VOC limit specified in §63.745(c), the permittee may retain the manufacturer's documentation and annual purchase records in place of the records specified above.
4. If the permittee is using the coating manufacturer's supplied data to demonstrate compliance based on the HAP content of the coating, and adding non-HAP solvent to those coatings, the permittee must also maintain records of the non-HAP solvent added to the coating. [§63.752(c)]
5. All records must be kept for a minimum of 5 years and be made available to Department of Natural Resources' personnel upon request.

Reporting Requirements:

1. The permittee shall submit reports according to the requirements of §63.753(a)(1)-(4) including:
 - a) An initial notification as required in §63.9(b)(2); and
 - b) A notification of compliance status as required in §63.9(h).
2. If a source fails to meet an applicable standard the permittee shall report such events in the semiannual report: [§63.753(5)(i)-(iii)]
 - a) The number of failures to meet an applicable standard;
 - b) For each instance, report the date, time and duration of each failure;

- c) For each failure the report must include a list of affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.
- 3. The permittee shall submit semiannual reports occurring every six months from the date of the notification of compliance status that identify: [§63.753(c)(1)-(2)]
 - a) For specialty coatings where compliance is not being achieved through the use of averaging or a control device, the HAP or VOC content in manufacturer’s supplied data or each value of H_i and G_i, that exceeds the applicable organic HAP or VOC content limit.
 - b) If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards.
- 4. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
- 5. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.
- 6. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

<p>PERMIT CONDITION 003 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>

Pickle Lines	
Emission Unit	Description
PL-A	Pickle Line A; Constructed 1976; HF controlled by Fume Scrubber
PL-B	Pickle Line B; Constructed 1976; HF controlled by Fume Scrubber
PL-C	Pickle Line C; Constructed 1976; HF controlled by Fume Scrubber

Emission Limitation:

- 1. The permittee shall not cause or permit emissions to be discharged into the atmosphere from PL-A, PL-B, and PL-C any visible emissions with opacity greater than twenty percent.
- 2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with opacity up to sixty percent.

Monitoring:

- 1. The permittee shall conduct visible emissions observations on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. 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 would be required. For emission units with visible emissions perceived or

- believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachment A), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment C)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B)
4. Attachments A, B and C, contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following 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 open burning, as specified in 10 CSR 10-6.045(3)(A), are allowed by the department when not prohibited by other laws, regulations, or ordinances, as specified in 10 CSR 10-6.045(3)(A).
3. Certain types of materials, as specified in 10 CSR 10-6.045(3)(B), 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 following 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.
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Identity of the equipment involved in the maintenance, start-up, or shutdown activity;
 - d) Time and duration of the period of excess emissions;
 - e) Type of activity and the reason for the maintenance, start-up, or shutdown;

- f) Type of air contaminant involved;
 - g) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
 - h) Measures taken to mitigate the extent and duration of the excess emissions; and
 - i) Measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
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. This rule does not apply to the construction or modification of installations that are exempted or excluded by 10 CSR 10-6.061.

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 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 a spreadsheet file, can be submitted for approval by the director. The Full Emissions Report is due April 1 after each reporting year. If the Full Emissions Report is filed electronically via MoEIS, this due date is extended to May 1
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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. Emission fees for the reporting year are due June 1 after each reporting year. The fees shall be payable to the Missouri Department of Natural Resources. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is 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. An odor evaluation shall be conducted when requested in writing by the director in response to verified odor complaints. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170

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

Emission Limitation:

1. The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2. The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3. Should the director determine 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 10-6.280 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.

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

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities 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 or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning

equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
(Rescinded on February 11, 1979, Contained in State Implementation Plan)**

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

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. and the requirements of 40 CFR §82.157 effective 01/01/2019.
 - 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(6)(C)1.B Permit Duration

10 CSR 10-6.065(6)(E)3.C Permit Renewal and Expiration

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. An installation's right to operate shall terminate upon the expiration of the permit, unless a complete permit renewal application is submitted at least six (6) months before the date of expiration, or unless the permitting authority takes final action approving an application for a permit renewal by the expiration date. 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 permit is issued or denied.

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

1. Record Keeping
 - a) All required monitoring data and support information, including all calibration and maintenance records and all original strip-chart recordings when used for continuous monitoring instrumentation, and copies of all reports required by the permit, 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 or AirComplianceReporting@dnr.mo.gov.
 - b) The permittee shall submit a report of all required monitoring by:
 - i. October 1st for monitoring which covers the January through June time period, and
 - ii. April 1st for monitoring which covers the July through December time period.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i. Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that

indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii. Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii. Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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(6)(C)1.F Severability Clause

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

10 CSR 10-6.065(6)(C)1.G General Requirements

1. The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2. The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3. The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4. This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5. The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3. All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4. The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

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

10 CSR 10-6.065(6)(C)6 Permit Shield

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

10 CSR 10-6.065(6)(C)7 Emergency Provisions

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1. Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

1. Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6-065(6)(B)(4) Certification by Responsible Official
10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Kevin Rahnert, Director of Operations. Since the submittal of the initial permit application the responsible official has been changed to Mr. Aaron Parker, Plant Manager. Any application form, report, or compliance certification submitted pursuant to this Part 70 Operating Permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification, shall be signed by a responsible official as defined in 10 CSR 10-6.020(2)(R)34, and shall contain the following language: “I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.”

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

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit shall be reopened for cause if:

1. The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2. MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
3. Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
4. The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5. MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis
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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.

Attachment B

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

This installation produces specially formed titanium sheet and plate products for a wide range of commercial applications. There are three (3) Pickle Lines which use a mixture of hydrofluoric acid and nitric acid to chemically etch and clean the titanium sheets prior to further processing. The pickle lines are equipped with an acid fume scrubber to control hydrogen fluoride emissions. Hot forming of titanium sheets is conducted using electrically-heated ovens and presses. A mold release coating is spray applied to keep sheets from sticking to molds. Other operations include storage tanks, grinding, water jet cutter, part cleaning, space heating and a 170 hp diesel emergency generator.

A recent emission assessment was conducted at the facility and it was determined that the uncontrolled PTE of Hydrogen Fluoride emissions from the acid pickling operations exceed the Clean Air Act major source threshold of 10 tons/year of a single Hazardous Air Pollutant. There are no other pollutants with uncontrolled potential emissions in excess of major source thresholds and uncontrolled PTE emissions of combined HAPs are below 25 tons/year.

This facility is a major source of Hydrogen Fluoride and is a minor source of all other criteria pollutants. It is not on the list of named sources; therefore fugitive emissions are not included in facility PTE calculations used to determine permit applicability.

This facility is subject to the NESHAP for Aerospace Manufacturing and Rework Facilities.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹	2016 Actual Emissions Reported
CO	3.7	---
NO _x	13.8	3.70
PM ₁₀	5.6	2.17
PM _{2.5}	5.6	2.17
SO _x	0.1	---
VOC	4.7	2.48
Combined HAP	17.7	2.09
Hydrogen Fluoride	16.9	0.39

Calculation of PTE was provided by the applicant in the operating permit application. Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The emergency generator was evaluated at 500 hours per year.

No actual emissions were reported in years prior to 2016 because the installation PTE was considered to be below de minimis which did not require the installation to have an operating permit or to submit emissions data on the Emissions Inventory Questionnaire (EIQ).

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 December 12, 2016;
- 2) 2015 Emissions Inventory Questionnaire, received December 12, 2016; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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 10-5.300, Control of Emissions from Solvent Metal Cleaning

This installation utilizes heated, automatic closed-top parts cleaners which are not subject to this rule because they use aqueous solvents.

10 CSR 10-5.295, Control of Emissions from Aerospace Manufacturing and Rework Facilities

This rule applies to all aerospace manufacture and/or rework facilities with potential emissions of VOC exceeding 25 tons/year. This facility produces metal components for aerospace vehicles, however it does not have the potential to emit VOC in excess of 25 tons/year, therefore this rule is not applied within the operating permit.

10 CSR 10-5.330, Control of Emissions from Industrial Surface Coating Operations

This rule applies to installations with actual emissions of VOC from surface coating operations, including related cleaning activities, of at least three (3) tons per 12-month rolling period. This facility is exempt from this rule per 10 CSR 10-5.330 (1)(D)8.A which exempts facilities which meet the exemption to 10 CSR 10-6.295 due to potential to emit VOC being below 25 tons/year.

10 CSR 10-5.500, Control of Emissions from Volatile Organic Liquid Storage

This rule does not apply to the storage vessels at this facility because they are less than 40,000 gallon capacity.

10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes

This rule does not apply to the Carpenter Shop, Sandblast Cabinet, Timesaver Grinder, and Upper and Lower Grinding because they at maximum design capacity have the potential to emit less than 0.5 lb/hour of particulate matter.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds and

10 CSR 10-6.261, Control of Sulfur Dioxide

The emergency generator is exempt from these regulations due to the exemptions in 10 CSR 10-6.260(1)(A)(1) and 10 CSR 10-6.261(1)(C)1. because it is subject to a fuel sulfur content limit under 10 CSR 10-6.070.

Construction Permit History

The facility has submitted a construction permit application for the installation of three additional spray booths.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart IIII, *Standards of Performance for Compression Ignition Stationary Internal Compression Engines*

This subpart applies to EG-1 Emergency Generator.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart GG, *National Emission Standards for Aerospace Manufacturing and Rework Facilities*

This facility originally applied for an Intermediate operating permit and requested a synthetic minor HAP limit prior to the applicability date for existing emission units (December 7, 2018) so that Subpart GG would not apply. However, the installation and operation of a small trial booth for the application of mold release coatings occurred after February 2015 which made the booth a new unit and reset the compliance date for new units- on or before December 7, 2015 or upon startup, whichever is later. Because the facility had not obtained the Intermediate operating permit and the federally enforceable plantwide synthetic minor HAP limit that was requested prior to the compliance date for new units, the facility must be considered subject to Subpart GG and may not now take a HAP limit to below major levels to avoid the MACT due to the "once in-always in policy."

40 CFR Part 63 Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Internal Compression Engines*

This subpart applies to EG-1 Emergency Generator however the unit demonstrates compliance by complying with 40 CFR Part 60 Subpart IIII.

40 CFR part 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart. This subpart does not apply because this facility does not use solvents with any of the contents listed above.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP 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*

This rule does not apply to insignificant particulate matter emitting sources that are contained within and emit only with a building space. Pickle Lines A, B and C (PL-A, PL-B and PL-C) control HF emissions using a fume scrubber which vents outside the building, therefore this regulation applies to these units.

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

The draft operating permit for RTI Advance Forming was placed on public notice December 15, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> . Public comments were received from Mr. Aaron Parker, Plant Manager. The comments are addressed in the order in which they appear within the letter(s).

Comment #1: Permit Requirement:

IV. Core Permit Requirements

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.

Comment:

RTI reviewed the advance notification requirements for maintenance, start-up or shutdown activities as contained in 10 CSR 10-6.050 (3)(B). RTI believes that the required information, while very similar, is not the same as what is required for malfunctions under 10 CSR 10-6.050 (3)(A). Therefore, RTI requests that paragraph 2 be revised to include the specific notification requirements as contained in 10 CSR 10-6.050 (3)(B) rather than referring to paragraph 1

Requested Change:

- 2) The permittee shall submit the following 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.

- a) Name and location of installation;
- b) Name and telephone number of person responsible for the installation;
- c) Identity of the equipment involved in the maintenance, start-up, or shutdown activity;
- d) Time and duration of the period of excess emissions;
- e) Type of activity and the reason for the maintenance, start-up, or shutdown;
- f) Type of air contaminant involved;
- g) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
- h) Measures taken to mitigate the extent and duration of the excess emissions; and
- i) Measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

Response to Comment: The changes have been made to the permit as requested.

Comment #2: Permit Requirement:

IV. Core Permit Requirements

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.

Comment:

RTI believes that the language of the condition may be the renewal language for Intermediate State Operating Permits as contained in 10 CSR 10-065 (5)(B)(1)(III) and which reads “(III) Renewal application. Installations subject to this section shall file complete applications for renewal of the operating permits at least six (6) months before the date of permit expiration. In no event shall this time be greater than eighteen (18) months”. The requirement for permit renewal for a Part 70 permit are already captured in the permit under section V. General Permit Requirements and the requirements under 10 CSR 10-6.065(6)(C)1.B Permit Duration and 10 CSR 10-6.065(6)(E)3.C Permit Renewal and Expiration. Therefore, RTI believes that the requirement can be deleted since it is duplicative.

Response to Comment: It is agreed that this permit language is duplicative therefore the changes is being made to the operating permit as requested.

Comment #3: Permit Requirement:

IV. Core Permit Requirements

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement 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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

Comment:

The RTI facility does not conduct operations that are likely to result in emissions of excessive odorous matter and, to our knowledge, does not have a history of odor complaints. The requirement as written does not have a basis for determining when an odor evaluation is required. RTI is concerned that it could be required to conduct an odor survey to have a basis for making a determination of compliance on the annual compliance certification regardless of whether there are odors being emitted from the facility or not. This seems like an undue burden for no apparent environmental benefit. RTI is requesting that the permit condition be modified to clarify that an odor survey shall be required when requested by the Director of the MDNR in response to verified odor complaints.

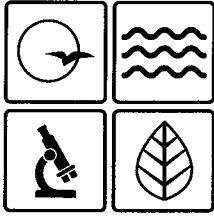
Requested Change:

10 CSR 10-6.165 Restriction of Emission of Odors
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Response to Comment: This suggested change to the permit language regarding 10 CSR 10-6.165 has been made to the operating permit.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

FEB 13 2018

Mr. Kevin Rahnert
RTI Advanced Forming, Inc.
1701 W. Main Street
Washington, MO 63090

Re: RTI Advanced Forming, Inc., 071-0029
Permit Number: OP2018-022

Dear Mr. Rahnert:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jwj

Enclosures

c: PAMS File: 2016-12-020



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