



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: OP2016-014
Expiration Date: MAY 25 2021
Installation ID: 021-0064
Project Number: 2011-05-029

Installation Name and Address

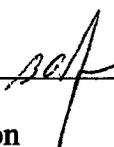
Silgan Containers Manufacturing
Corporation
P.O. Box 4488
St. Joseph, MO 64504
Buchanan County

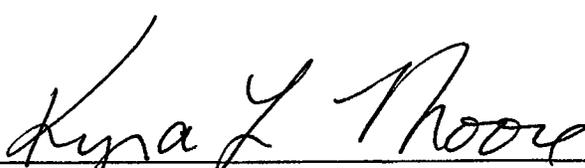
Parent Company's Name and Address

Silgan Containers Manufacturing
Corporation
21800 Oxnard Street, Suite 600
Woodland Hills CA, 91367

Installation Description:

Silgan Containers Manufacturing Corporation owns and operates a food product can manufacturing plant in St. Joseph, Missouri. The five major departments within the installation are draw & ironed two-piece can manufacturing, steel & aluminum draw/redraw can manufacturing, aluminum can end manufacturing, sheet coating & lithography operations, and coil shearing. Manufactured products are packaged and shipped offsite to customers. The installation is a major source of Volatile Organic Compounds (VOCs).

Prepared by 
Bern Johnson
Operating Permit Unit


Director or Designee
Department of Natural Resources
MAY 25 2016

Effective Date

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING.....4
INSTALLATION DESCRIPTION4
EMISSION UNITS WITH LIMITATIONS5
EMISSION UNITS WITHOUT LIMITATIONS6

II. PLANT WIDE EMISSION LIMITATIONS.....7
PERMIT CONDITION PW0017
10 CSR 10-6.060 Construction Permits Required7
Construction Permit #072013-013 Issued July 22, 20137

III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS8
PERMIT CONDITION 18
10 CSR 10-6.060 Construction Permits Required8
Construction Permit #082000-012 Issued July 28, 20008
PERMIT CONDITION 29
10 CSR 10-6.060 Construction Permits Required9
Construction Permit #122008-001 Issued December 1, 20089
PERMIT CONDITION 310
10 CSR 10-6.060 Construction Permits Required10
Construction Permit #072013-013 Issued July 22, 201310
Construction Permit Amendment #072013-013A Issued June 22, 2015.....10
PERMIT CONDITION 411
10 CSR 10-6.060 Construction Permits Required11
Construction Permit #072013-013 Issued July 22, 201311
Construction Permit Amendment #072013-013A Issued June 22, 2015.....11
PERMIT CONDITION 512
10 CSR 10-6.060 Construction Permits Required12
Construction Permit #072013-013 Issued July 22, 201312
PERMIT CONDITION 612
10 CSR 10-6.060 Construction Permits Required12
Construction Permit #072013-013 Issued July 22, 201312
PERMIT CONDITION 713
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants.....13
Sources Installed Before February 24, 197113
PERMIT CONDITION 814
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants.....14
Sources Installed After February 24, 197114

IV. CORE PERMIT REQUIREMENTS.....16

V. GENERAL PERMIT REQUIREMENTS21

VI. ATTACHMENTS27
ATTACHMENT A.....28
Fugitive Emission Observations28

ATTACHMENT B.....	29
Opacity Emission Observations.....	29
ATTACHMENT C.....	30
Method 9 Opacity Emissions Observations.....	30
ATTACHMENT D.....	31
Inspection/Maintenance/Repair/Malfunction Log.....	31
ATTACHMENT E.....	32
Sheet Coating Line 3 material.....	32
ATTACHMENT F.....	33
Combined HAPs Compliance Worksheet.....	33
ATTACHMENT G.....	34
VOC Compliance Worksheet.....	34
ATTACHMENT H.....	36
Individual HAP Compliance Worksheet.....	36
ATTACHMENT I.....	37
Alternative Coatings Compliance Worksheet.....	37
APPENDIX A.....	38
Abbreviations and Acronyms.....	38

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Silgan Containers Manufacturing Corporation owns and operates a food product can manufacturing plant in St. Joseph, Missouri. The five major departments within the installation are draw & ironed (D&I) two-piece can manufacturing, steel & aluminum draw/redraw (DRD) can manufacturing, steel can end manufacturing, sheet coating & lithography operations, and coil shearing. Manufactured products are packaged and shipped offsite to customers.

For the D&I two-piece can manufacturing, the process begins with coil steel. The material is uncoiled and lubricated before being stamped into cups in a cupping press. The cups go to the bodymakers, where they are ironed and drawn to the appropriate size with the aid of a lubricating solution that also acts as a coolant. Excess metal is then trimmed and the cans are washed. After washing, the cans have a washcoat enamel applied to the outside surfaces and are cured in a two-stage natural gas-fired drying washcoat oven. After leaving the oven, the cans are flanged, beaded to increase side strength, and tested for integrity. Spray enamel is applied to the inside of the cans by inside spray machines. An ink dot printer marks the cans, identifying which specific inside spray machine was used in each can's manufacture, and the enameled cans are cured in a natural gas-fired inside bake oven. The finished can bodies have a printed code applied for identification using a Videojet printer, then packaged and sent to the warehouse.

The steel and aluminum DRD can manufacturing process begins with pre-lubricated and pre-coated coil steel and aluminum. The material is uncoiled before being stamped into cups in a stamping press. The cans are trimmed to remove excess metal, flanged to allow for the end to be applied, and tested for integrity. The finished can bodies have a printed code applied for identification using a Videojet printer and are packaged and sent to the warehouse.

The steel can end manufacturing process begins with pre-coated cut sheets of steel. The pre-coated coils/sheets are stamped into shells in a shell press, then conveyed to a compound liner/applicator. The shells are lined with a compound to act as a seal when the end is applied to the can body. A solvent mist is sprayed onto the compound liner/applicator to prevent an excessive build-up of compound. The finished ends are packaged and sent to the warehouse.

The sheet coating and lithography operations begin with uncoated coil steel. The coil is cut into sheet pieces, then stacked on a conveyor system that includes an automatic sheet feeder, which is equipped with air and vacuum. The air assists in separating the sheets while the vacuum is connected to suction cups located above the sheets that lift the top sheet and feed it into the system on each revolution of the coater roll. Coating is applied to the metal sheet in one of three lines. Lines 1 and 2 consist of a roll coater, conventional ink offset lithographic press, and a curing oven. Line 3 consists of a roll coater and curing oven. The rubber roll coaters transfer the coating to the metal sheet as it passes between the rubber roller and a backing roller. Lithography presses apply ink to the coated sheets by transferring the design to a master plate that is attached to a large drum, which transfers the inked image to a pre-coated sheet. The sheets are cured in a curing oven and heated from a heat recovery system that utilizes waste heat from a recuperative thermal oxidizer. Finished sheets are stacked, bundled, and sent to the warehouse.

The coil shearing process begins with uncoated coil steel. The coil is cut into sheets, packaged, and sent to the warehouse or to the sheet coating and lithography department for further processing.

The installation is a major source of Volatile Organic Compounds (VOCs). The VOC and Hazardous Air Pollutant (HAP) emissions are controlled by a regenerative thermal oxidizer connected to two permanent total enclosures associated with the D&I two-piece can manufacturing inside spray machines, lithography presses, and sheet coater application rolls; and a recuperative thermal oxidizer associated with the sheet coating/lithography curing oven. Silgan Containers is not a named source.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.62	0.56	0.52	0.52	0.55
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.62	0.56	0.52	0.52	0.55
Sulfur Oxides (SO _x)	0.05	0.04	0.04	0.04	0.04
Nitrogen Oxides (NO _x)	8.10	7.40	6.90	6.90	7.20
Volatile Organic Compounds(VOC)	21.42	23.68	22.68	23.28	22.79
Carbon Monoxide (CO)	6.80	6.22	5.80	5.80	6.05
Hazardous Air Pollutants (HAPs)	0.09	0.09	0.08	0.08	0.09

* - HAP emissions are included in VOCs in this table. See Statement of Basis for a list of individual HAP potential-to-emit (PTE).

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.

2013 EIQ Emission Point #	Description
ES-2000	Cleanup D&I
ES-2010	Washcoat
ES-2020	Draw &Iron line w/ RTO
ES-2021	Inside Bake Oven
ES-2023	Washcoat Bake Oven

2013 EIQ Emission Point #	Description
ES-2024	Stolle Inside Spray machines
ES-2100	D&I Videojet Printers
ES-2200	D&I Ink Dot Printer
ES-3040	End Seal Compound Applicator-Steel Line No.2
ES-3100	Equipment Cleanup for Press Lines
ES-3110	Mist Applicators(Plantwide)
ES-3200	DRD Videojet Printers
ES-3300	Smith Thermal Oxidizer for Sheet Coaters
ES-3310	SheetCoaterNo.1
ES-3320	SheetCoaterNo.2
ES-3330	Cleanup of Sheet Coating Lines
ES-3340	Sheet CoaterNo.3
ES-3350	Anguil Regenerative Thermal Oxidizer

EMISSION UNITS WITHOUT LIMITATIONS

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

2013 EIQ Emission Point #	Description
na	Aluminum DRD can manufacturing cupping press, bodymakers/trimmers, flangers, testers, DRD Videojet
na	Printer and packaging/palletizer
na	D&I two-piece can manufacturing cupping press, bodymakers/trimmers, testers, beadars, flangers, and packaging/palletizer
na	Sheet coating and lithography operations sheet stackers/feeders
na	Coil sheering sheers and packaging/palletizer
na	Parts washers
na	5,000-gallon lining compound aboveground storage tank (AST)

na	7,000-gallon washcoat AST
na	2 @ 10,000-gallon inside spray storage tank
na	4,000 gallon used oil storage tank
na	1,800 gallon clean oil storage tank
na	1,000 gallon clean oil storage tank
na	8,000 gallon sheet coating storage tank
na	10,000 gallon sheet coating storage tank

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit #072013-013 Issued July 22, 2013

Emissions Limitations:

- 1) The permittee shall emit less than 10 tons of any individual HAP in any period of 12 consecutive months. [Special Condition 2].
- 2) The permittee shall emit less than 25 tons of any combination of HAPs in any period of 12 consecutive months. [Special Condition 2].
- 3) The permittee shall emit less than 250.0 tons of VOC in any consecutive 12-month period [Special Condition 3].
- 4) The permittee shall keep all coatings, inks, solvents, and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all coatings, inks, solvents, and cleaning solution containers used with this equipment. [Special Condition 8].

Monitoring/Recordkeeping:

- 1) The permittee shall calculate and record monthly emissions of VOCs and individual & combined HAPs from these emission units. The records shall contain both the monthly and twelve-month rolling totals (see Attachment F, G, and H or their equivalents).
- 2) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month in which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1		
10 CSR 10-6.060 Construction Permits Required Construction Permit #082000-012 Issued July 28, 2000		
Emission Unit	Description	Control Device
ES-2020	D&I line – installed 2000	Smith Engineering RTO

Operational Limitation:

- 1) The permittee shall operate the Smith Engineering regenerative thermal oxidizer (RTO) at all times when the D&I two-piece can manufacturing processes are in operation or any time that regulated VOC or HAP emissions are possible [Special Condition 1].
- 2) The Smith RTO shall achieve a destruction removal efficiency of VOCs and HAPs of at least 95%. The permittee shall operate the Smith RTO at a set point temperature of 1500° F and all instantaneous readings must be greater than or equal to 1440° F.

Monitoring/Recordkeeping:

- 1) The permittee shall operate the Smith RTO in accordance with the manufacturer’s specifications [Special Condition 1].
- 2) The permittee shall continuously monitor and record the operating temperature of the Smith RTO any time the D&I two-piece can manufacturing process is in operation or any time that regulated VOC or HAP emissions are possible [Special Condition 2].
- 3) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources’ personnel upon request [Special Condition 2].

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 2			
10 CSR 10-6.060 Construction Permits Required			
Construction Permit #122008-001 Issued December 1, 2008			
Emission Unit	Description	Manufacturer/ Model #	Control Device
ES-3310	Sheet Coating Line 1 – installed 1970	Wagner	RTO (CD-1)
ES-3320	Sheet Coating Line 2 – installed 1970	Wagner	RTO (CD-1)
ES-3340	Sheet Coating Line 3 – installed 2009	Wagner	Anguil RTO (CD-3)

Operational Limitation:

- 1) If the permittee considers using a material other than those listed in Attachment E in ES-3310, it must calculate potential-to-emit for VOCs and individual HAPs in the alternative material. Before using the alternative material, the permittee must seek approval from the Air Program if:
 - a) the VOC PTE for the alternate material is \geq 26.8 tons per year, or
 - b) the PTE for any individual HAP is \geq the Screen Modeling Action Level (see *Air Pollution Control Program Table of Hazardous Air Pollutants and Screening Model Action Levels*, Revision 10, May 2012 in <http://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>. [Special Condition 2])
- 2) The permittee shall operate a regenerative thermal oxidizer at all times when any of the three Sheet Coating and Lithography lines are in operation [modified Special Condition 3].
- 3) The Anguil RTO (CD-3) shall achieve a destruction removal efficiency of VOCs of at least 98% by weight [Special Condition 3]. The permittee shall operate Anguil RTO at an average temperature of 1550° F and the temperature must be maintained at no more than 50° F below average (1500° F).
- 4) The permittee shall keep all solvents, inks, and cleaning solutions in sealed containers whenever the materials are not in use [Special Condition 5].
- 5) The permittee shall provide and maintain suitable, easily read, permanent markings on all ink, solvent, and cleaning solution containers used with these emission units [Special Condition 5].

Monitoring/Recordkeeping:

- 1) The permittee shall operate the RTOs in accordance with the manufacturer’s specifications [Special Condition 3].
- 2) The permittee shall maintain an operating, maintenance and inspection log for the RTO which shall include the following:
 - a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on missions due to the malfunction;
 - b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.; and
 - c) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection (Attachment D or equivalent).
- 3) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources’ personnel upon request.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 3 10 CSR 10-6.060 Construction Permits Required Construction Permit #072013-013 Issued July 22, 2013 Construction Permit Amendment #072013-013A Issued June 22, 2015			
Emission Unit	Description	Manufacturer/Model #	Control Device
ES-2010	Washcoat – installed 1990	na	Smith RTO
ES-2024	Inside Spray machines – installed 2013	Stolle Machinery	Smith RTO

Operational Limitation:

- 1) The permittee shall control VOC emissions from ES-2010 Washcoat and ES-2024 Inside Spray Machines using a Smith RTO [Special Condition 4A].
- 2) The permittee shall operate the Smith RTO at all times ES-2010 Washcoat and ES-2024 Inside Spray Machines are in operation. The Smith RTO shall be operated and maintained in accordance with the manufacturer’s specifications to ensure a minimum VOC destruction efficiency of 97.6 weight percent [Special Condition 2 of Amendment].
- 3) The permittee shall verify VOC destruction efficiency through performance test conducted at least once every five years (see Statement of Basis for schedule). [Special Condition 4 & 11].
- 4) The permittee shall operate the Smith RTO at a set point temperature of 1500° F and all instantaneous readings must be greater than or equal to 1440° F. [Special Condition 4C].

Monitoring/Recordkeeping:

- 1) The permittee shall maintain a copy of the Smith RTO’s manufacturer’s operation and maintenance manual on site. [Special Condition 4D].
- 2) The permittee shall continuously monitor and record the operating temperature of the Smith RTO (see Operational Limit 3 & 4) [Special Condition 4C].
- 3) The permittee shall maintain an operating, maintenance and inspection log for the Smith RTO which shall include the following (Attachment D or equivalent) [Special Condition 4E]:
 - a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on missions due to the malfunction; and
 - b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.
- 4) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources’ personnel upon request.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 4		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit #072013-013 Issued July 22, 2013		
Construction Permit Amendment #072013-013A Issued June 22, 2015		
Emission Unit	Description	Manufacturer/Model #
ES-2024	Inside Spray Machines – installed 2013	Stolle Machinery

Operational Limitation:

- 1) The permittee shall control particulate emissions from ES-2024 Inside Spray Machines using a fabric filter [Special Condition 5A].
- 2) The permittee shall operate and maintain the fabric filters in accordance with the manufacturer's specifications. The fabric filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. [Special Condition 5B].
- 3) The permittee shall keep replacement filters on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).[Special Condition 5C].
- 4) The permittee shall operate ES-2024 Inside Spray Machines within a permanent total enclosure such that 100 percent of emissions from ES-2024 Inside Spray Machines are captured and routed to Smith RTO [Special Condition 6A].

Monitoring/Recordkeeping:

- 1) The permittee shall monitor and record the operating pressure drop across the fabric filter at least once every 12 hours. The operating pressure drop shall be maintained such that the greatest pressure drop does not exceed 2" (of water, gauge pressure). The fabric filters shall be changed a minimum of twice per consecutive 24-hour period, but shall be changed any time the pressure drop exceeds 2" [Special Condition 3A of Amendment].
- 2) The permittee shall maintain a copy of the proper fabric filter operating procedures set by the manufacturer's performance warranty on site [Special Condition 3B of Amendment].
- 3) The permittee shall maintain an operating, maintenance and inspection log for the permanent total enclosure which shall include the following [Special Condition 6C]:
 - a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on missions due to the malfunction; and
 - b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.
- 4) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 5		
10 CSR 10-6.060 Construction Permits Required Construction Permit #072013-013 Issued July 22, 2013		
Emission Unit	Description	Manufacturer/Model #
ES-2010	Washcoat – installed 1990	

Operational Limitation:

- 1) The permittee shall operate ES-2010 Washcoat within a partial enclosure such that a minimum of 46.3 percent of emissions (see Statement of Basis) from ES-2010 Washcoat are captured and routed to the Smith RTO [Special Condition 7A].

Monitoring/Recordkeeping:

- 1) Capture efficiency is achieved by operation of the Smith RTO required by Permit Condition 3.
- 2) The permittee shall maintain an operating, maintenance and inspection log for the permanent total enclosure which shall include the following [Special Condition 6C]:
 - a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on missions due to the malfunction; and
 - b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.
- 3) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources’ personnel upon request.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 6		
10 CSR 10-6.060 Construction Permits Required Construction Permit #072013-013 Issued July 22, 2013		
Emission Unit	Description	Manufacturer/Model #
ES-2000	Cleanup D&I	
ES-2010	Washcoat – installed 1990	
ES-2024	Inside Spray Machines – installed 2013	Stolle Machinery
ES-2100	D&I Videojet Printers	
ES-2200	D&I Ink Dot Printer – installed 1998	

Operational Limitation:

- 1) If the permittee considers using an alternative coating, ink, solvent, or cleaning solution in these units other than those listed in Attachment E (from the application for the Construction Permit), it must calculate potential-to-emit for all individual HAPs in the alternative material. Before using the alternative material, the permittee must seek approval from the Air Program if the PTE for any individual HAP is \geq the Screen Modeling Action Level (see *Air Pollution Control Program Table*

of Hazardous Air Pollutants and Screening Model Action Levels, Revision 10, (May 2012)
<http://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf> [Special Condition 9].

Monitoring/Recordkeeping:

- 1) The permittee shall use Attachment I or an equivalent form approved by the Air Pollution Control Program, such as electronic forms, shall be used to demonstrate compliance with Special Condition 9.A.
- 2) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources’ personnel upon request.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 7		
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants		
Sources Installed Before February 24, 1971		
Emission Unit	Description	Manufacturer & Model
ES-3310	Sheet Coating Line 1 – installed 1970	Wagner
ES-3320	Sheet Coating Line 2 – installed 1970	Wagner

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from this emission unit any visible emissions with an opacity greater than 40%.
- 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 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-

- (1) The permittee may observe once per month.
- (2) 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.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results using Attachment B (or its equivalent), 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;
 - c) Whether the visible emissions were normal for the process;
 - d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
 - e) The permittee shall maintain records of all EPA Method 9 opacity tests performed.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after end of the month in which the permittee determines that the emission unit exceeded the emission limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 8		
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants		
Sources Installed After February 24, 1971		
Emission Unit	Description	Manufacturer & Model
ES-2010	Washcoat – installed 1990	
ES-2020	D&I line Regenerative Thermal Oxidizer – installed 2000	Smith Engineering
ES-2021	Inside Bake Oven – installed (2000)	
ES-2023	Washcoat Oven – installed (2001)	
ES-2024	Inside Spray Machines – installed 2013	Stolle Machinery
ES-2100	D&I Videojet Printers	
ES-2200	D&I Ink Dot Printer – installed 1998	
ES-3040	End Seal Compound Applicator-Steel Line No.2	
ES-3110	Mist Applicators(Plantwide)	
ES-3200	DRD Videojet Printers	
ES-3300	Smith Thermal Oxidizer for Sheet Coaters	
ES-3310	Sheet Coating Line 1 – installed 1970	Wagner
ES-3320	Sheet Coating Line 2 – installed 1970	Wagner

ES-3340	Sheet Coating Line 3 – installed 2009	Wagner
ES-3350	Anguil Regenerative Thermal Oxidizer	

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units 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 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) 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.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results using Attachment B (or its equivalent), 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;
 - c) Whether the visible emissions were normal for the process;
 - d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
 - e) The permittee shall maintain records of all EPA Method 9 opacity tests performed.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after end of the month in which the permittee determines that the emission unit exceeded the emission limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of

the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170

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

Emission Limitation:

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

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

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
 - ii) 10 CSR 10-6.040, “Reference Methods”;
 - iii) 10 CSR 10-6.070, “New Source Performance Standards”;
 - iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”;
 - 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.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance

- must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
- b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

III. General Permit Requirements

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

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

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance/Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

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

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

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

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, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, 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, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

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

10 CSR 10-6.020(2)(R)39 Responsible Official

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

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

This permit may be reopened for cause if:

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

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

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

IV. Attachments

Attachments follow.

¹If there are visible emissions, the permittee shall complete the excess emissions columns.

Attachment C

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 _____

Attachment E

Sheet Coating Line 3 material

This list of coatings is from the application for Construction Permit #072013-013 and is referenced by Special Condition 9 of that permit and Permit Condition 6 of this Operating Permit.

A.19.1

A.45.5

A.64.4

A.66.5

C.10.1

E.1.11

E.1.3

E.1.7

E.20.1

E.25.5

E.36.5

E.57.1

E.57.6

E.57.8

E.68.5

G.41.6

O.66.3

O.66.4

O.116.2

O.120.3

S.C.1.0

V.16.2

V.39.5

V.47.5

Methyl Ethyl Ketone

Glycol Ether GB

Solvesso 100

Attachment F
 Combined HAPs Compliance Worksheet

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

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsHAP/ unit)	Overall Control (%)	³ Total Monthly Emissions (tons)
ES-2010	Washcoat		gal	1.44 lbs Formaldehyde	45.3	
ES-2024	Inside Spray Machine		gal	0.27 lbs MBK	0	
				0.36 lbs Glycol Ether		
				0.09 lbs Xylene		
				0.04 lbs Formaldehyde		
				0.02 lbs Ethylbenzene		
ES-2100	D&I Videojet printer		gal	2.71 lbs methyl alcohol	97.8	
	natural gas usage	0.034 (max)	mmft ³	1.8885 lbs HAP	0	0.023
⁵Total Monthly Installation-Wide HAP Emissions (tons)						
⁶Total 12-Month Rolling Installation-Wide HAP Emissions (tons)						

¹ Enter total amount of material (indicated in the next column) used in month.
² Emission factor sources are MSDS for paint booths, using the highest HAP content if different coatings are used; and WebFIRE for all others.
³ Total monthly emissions = Monthly Usage * Emission Factor * (Overall Control/100) * 0.0005.
⁴ Potential natural gas emissions are 0.034 mmft³ * 720 hours * 1.8885 lbs HAP/mmft³ * 0.0005 tons/lb = 0.023 tons combined HAPs/month
⁵Total installation emissions are the sum of the total monthly emissions for each emission point.
⁶12-Month Rolling HAP Emissions = Sum of twelve most recent Combined HAPs Compliance Worksheets.

12-Month Rolling Total Combined HAP Emissions less than 25 tons/yr indicates compliance.

Attachment G
VOC Compliance Worksheet

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

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsVOC/unit)	³ Total Monthly Emissions (tons/month)
ES-2000	Cleanup D&I		gal	6.59	
ES-2010	Washcoat		gal	1.44	
ES-2024	Inside Spray Machine		gal	2.19	
ES-2100	D&I Videojet printer		gal	6.52	
ES-2200	D&I Ink Dot Printer		gal	6.82	
ES-3040	End Seal Applicator-Steel LineNo.2		tons	852.00	
ES-3100	Equip Cleanup – Press Lines		tons	2,000.00	
ES-3110	Mist Applicators (Plantwide)		tons	2,000.00	
ES-3200	DRD Videojet Printers		tons	1,889.62	
ES-3310	Sheet Coater No.1		tons	1,312.34	
ES-3320	Sheet Coater No.2		tons	1,320.75	
ES-3330	Cleanup - Sheet Coating Lines		tons	400.35	
ES-3340	Sheet Coater No.3		tons	1,171.09	
	natural gas usage ⁴	0.034 (max)	mmft ³	5.3	0.065
⁵Total Monthly Installation-Wide VOC Emissions (tons)					
⁶Total 12-Month Rolling Installation-Wide VOC Emissions (tons)					

¹ Enter total amount of material (indicated in the next column) used in month.

² Emission factor sources are MSDS for EP-2024, using the highest VOC content if different coatings are used; mass balance worksheet for EP-2100, -2200, -3040, -3200, -3310, -3320, -3330, & -3400; and AP-42 for all others.

³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

⁴ Potential natural gas emissions are 0.034 mmft³/hr * 720 hr/month * 5.3 lbs VOC/mmft³ * 0.0005 tons/lb = 0.065 tons VOC/month

⁵Total installation emissions are the sum of the total monthly emissions for each emission point.

⁶12-Month Rolling VOC Emissions = Sum of twelve most recent Combined VOC Compliance Worksheets.

12-Month Rolling Total VOC Emissions less than 250 tons/yr indicates compliance.

Attachment H
 Individual HAP Compliance Worksheet

HAP Name: _____ CAS No.: _____

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

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsHAP/ unit)	Overall Control (%)	³ Total Monthly Emissions (tons)
ES-2010	Washcoat		gal		45.3	
ES-2024	Inside Spray Machine		gal		0	
ES-2100	D&I Videojet printer		gal		97.8	
	natural gas usage	0.034 (max)	mmft^3	1.8885 lbs HAP	0	0.023
⁵Total Monthly Installation-Wide HAP Emissions (tons)						
⁶Total 12-Month Rolling Installation-Wide HAP Emissions (tons)						

¹ Enter total amount of material (indicated in the next column) used in month.

² Emission factor for each HAP is found in Attachment F.

³ Total monthly emissions = Monthly Usage * Emission Factor * (Overall Control/100) * 0.0005.

⁴ Potential natural gas emissions are 0.034 mmft^3 * 720 hours * 1.8885 lbs HAP/mmft^3 * 0.0005 tons/lb = 0.023 tons combined HAPs/month

⁵Total installation emissions are the sum of the total monthly emissions for each emission point.

⁶12-Month Rolling HAP Emissions = Sum of twelve most recent Individual HAPs Compliance Worksheets.

12-Month Rolling Total Individual HAP Emissions less than 10 tons/yr indicates compliance.

Attachment I
 Alternative Coatings Compliance Worksheet

This sheet covers ES-2000, ES-2010, ES-2024, ES-2100, or ES-2200 (circle one)

Individual HAP and CAS No.	Is the HAP particulate or VOC	Coating Material Density (lbs/gal)	Maximum Individual HAP Content (wt %)	Maximum Hourly Application Rate (gal/hr)	Overall VOC Control Efficiency ¹ (%)	Individual HAP PTE ² (tpy)	Individual HAP SMAL (tpy)

1 – ES-2000 and ES-2010 has a capture efficiency of 46.3% and a destruction efficiency of 97.8% percent for an overall VOC control efficiency of 45.28%. ES-2024 has a capture efficiency of 100% and a destruction efficiency of 97.8% for an overall VOC control efficiency of 97.8%. ES-2100 and ES-2200 do not operate federally enforceable control devices. Overall VOC control efficiency shall only be used in PTE calculations for HAP listed as VOC. HAP listed as particulate shall not use the overall VOC control efficiency in PTE calculations. If subsequent performance tests indicate higher capture and/or destruction efficiencies the permittee may use the higher efficiency values provided the permittee maintains a copy of the performance test report to verify the source of the higher efficiency.

2 – Individual HAP PTE (tpy) = Coating/Material Density (lb/gal) x Maximum Individual HAP Content (wt%) x Maximum Hourly Application Rate (gal/hr) x 8760 (hr/yr) x 0.0005 (ton/lb) x (1 – Overall VOC Control Efficiency (%)/100). **The permittee may use the coating/material if the Individual HAP PTE (tpy) is less than the Individual HAP SMAL (tpy). The permittee shall submit a construction permit application to request to use coatings/materials with Individual HAP PTE (tpy) equal to or greater than the Individual HAP SMAL (tpy).**

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MW megawatt
acfm actual cubic feet per minute	MHDR maximum hourly design rate
BACT Best Available Control Technology	MMBtu Million British thermal units
BMPs Best Management Practices	MMCF million cubic feet
Btu British thermal unit	MSDS Material Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQS National Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs ... National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_x nitrogen oxides
CFR Code of Federal Regulations	NSPS New Source Performance Standards
CO carbon monoxide	NSR New Source Review
CO₂ carbon dioxide	PM particulate matter
CO₂e carbon dioxide equivalent	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppm parts per million
dscf dry standard cubic feet	PSD Prevention of Significant Deterioration
EQ Emission Inventory Questionnaire	PTE potential to emit
EP Emission Point	RACT Reasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCC Source Classification Code
fps feet per second	scfm standard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAP Hazardous Air Pollutant	tph tons per hour
hr hour	tpy tons per year
hp horsepower	VMT vehicle miles traveled
lb pound	VOC Volatile Organic Compound
lbs/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received May 10, 2011;
- 2) Part 70 Operating Permit OP2006-078, November 7, 2006;
- 3) Construction Permit #0890-007a;
- 4) Construction Permit #0192-010;
- 5) Construction Permit #082000-012 ;
- 6) Construction Permit #092002-023;
- 7) Construction Permit #122003-009;
- 8) Construction Permit #062004-015 ;
- 9) Construction Permit #122008-001;
- 10) Construction Permit #062011-015;
- 11) Construction Permit #072013-013;
- 12) Construction Permit #072013-013A;
- 13) 2013 Emissions Inventory from MOEIS;
- 14) WebFIRE; and
- 15) 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.

Construction Permit #072013-013 was issued on July 22, 2013, after the application was received. Permit conditions 3 through 6 are from this construction permit.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *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* and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – 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 are exempt from the requirements of these rules [(1)(A)(2) and (1)(A)].

10 CSR 10-6.400 - *Restriction of Emission of Particulate Matter from Industrial Processes* – this regulation applies to emission units that emit particulate matter, such as spray paint booths. EP-2024

has a permanent total enclosure booth with a control device that controls greater than 95% of overspray. Therefore, this rule does not apply to the spray booths under 10 CSR 10-6.400(1)(B)14.

Construction Permit History

Construction Permit #1189-002 – this permit contained a production limit for the D&I two-can manufacturing line production rate. This limit was increased to 1,650 cans per minute in 2004 (2004-12-072). Therefore, none of the special conditions contained in this permit were incorporated into the Operating Permit.

Construction Permits #0890-007 and #0890-007A – on August 14, 1990, the permittee was issued a construction permit for the installation of a three-liner gang end press (CP #0890-007). The equipment was not installed and the permittee requested and received an amendment (CP #0890-007A) on November 17, 1992. The amendment allowed the permittee to install a two-liner gang end press. By 1994, the permitted equipment had not been installed and the permit time limit had expired. None of the special conditions contained in either permit were incorporated into the Operating Permit.

Construction Permit #0192-010 – this permit was issued for the installation of a Burke conversion press. That emission unit has since been dismantled. Therefore, the Special Condition of the permit no longer apply and are not included.

Construction Permits #062000-015 and #122003-009 – this permit was issued for the installation of a new 208-size end line consisting of a Formatec gang press, a misting applicator, a DRT conversion press, and a CMB compound liner. Since emissions of VOC from the proposed equipment triggered major review, the permit to construct was reviewed under 10 CSR 10- 6.060(8) and contained BACT limits for VOC. The permittee installed only the DRT conversion press and CP #122003-009 was issued to modify CP #062000-015 and remove associated BACT limits. Special Condition #1 in CP #122003-009 superseded all of the special conditions in this permit. A BACT analysis from a similar Silgan installation in Minnesota was submitted. However, the DRT conversion press has since been removed. Therefore, the Special Conditions of this permit no longer apply and are not included.

Construction Permit #082000-012 – this permit was issued for the installation of a Smith Engineering regenerative thermal oxidizer, a 10,000- gallon inside spray storage tank, and replacement of the D&I inside bake oven. Special Conditions #3 through #14 requirements have been fulfilled. Special Conditions #1 and #2 of this permit are incorporated into this Operating Permit since these conditions are operational requirements for the Smith Engineering regenerative thermal oxidizer. Of note, this permit indicated that 10 CSR 10-2.230, *Control of Emissions from Industrial Surface Coating Operations*, applied to the washcoat applicator and the inside spray machines. This rule is applicable only to installations located in Clay, Jackson, and Platte Counties; therefore this regulation does not apply to the installation and has not been incorporated into this Operating Permit.

Construction Permit #092002-023 – this permit was issued for the installation of a PTE for the two (2) existing sheet coating and lithography lines, a 75% thermal efficient Ross Air Systems recuperative thermal oxidizer, a side feeder for sheet coating line 2, and the addition of conventional inks on sheet coating line 2. According to the CP, the Ross Air Systems recuperative thermal oxidizer was to replace a “Smith regenerative thermal oxidizer”, emission point EP-330A. The Ross Air Systems recuperative

thermal oxidizer in fact replaced the Anguil recuperative thermal oxidizer that was originally installed for odor control. The special conditions of this permit are incorporated into the Operating Permit.

Construction Permit #062004-015 – this permit was issued at the request of Silgan Containers to address certain discrepancies and omissions in its permit history. The purpose was to define operating parameters for an end seal applicator. The equipment has since been dismantled and the Special Conditions no longer apply.

Construction Permit #122008-001 – this permit was issued for installation of a third sheet coating line and accompanying RTO. Special condition 3 requires all RTOs to be in use when any of the three lines is in operation. Average and minimum temperatures referred to in Permit Condition 2 are for CD-3 only. They are from an April 2014 stack test and needed to meet the 98% control efficiency requirement.

Construction Permit #062011-010 – this permit was issued for modification of a previous permit – #092009-023. The modification was the removal of butyl cellulose acetate and ethylene glycol monoethyl ether acetate limitation. The second special condition was later superseded by CP #072013-013. Therefore, neither special condition is incorporated into the Operating Permit.

Construction Permit #072013-013 – this permit was issued in 2013 for replacement of D&I Inside Spray Machines and increased D&I line production. The permit superseded three conditions from previous construction permits and restated them. Required performance testing for the Smith RTO was conducted in April 2014. The results were incorporated into Permit Condition 3. The next test should be performed by May 1, 2019. The required partial enclosure capture efficiency in Permit Condition 5, 46.3%, was determined during a stack test in 2001. When the D&I line is operated with an RTO, which is required in Permit Condition 3, this requirement will be achieved.

Construction Permit #072013-013A – this permit amendment was issued to address a deficiency with the Smith RTO. An NOV for failing to meet the required destruction efficiency was issued on September 3, 2014. Silgan Containers applied for and was issued this amendment to modify the destruction efficiency of the Smith RTO to a level equal to its most recent performance test from May 1, 2014. That level is 97.6%.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. This rule applies to petroleum storage tanks built or modified between the dates indicated and that have a minimum capacity of 40,000 gallons. The largest tank at this facility has a capacity of 10,000 gallons. Therefore, this rule does not apply.

40 CFR Part 60 Subpart Ka – Standards of Performance for Storage Vessels for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. This rule applies to petroleum storage tanks built or modified between the dates indicated and that have a minimum capacity of 40,000 gallons. The largest tank at this facility has a capacity of 10,000 gallons. Therefore, this rule does not apply.

40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. This rule applies to storage vessels for various types of organic liquids that were constructed after July 23, 1984 and has a minimum capacity of 75 cubic meters. The largest tank at this facility has a capacity of 10,000 gallons, or just less than 38 cubic meters. Therefore, this rule does not apply.

40 CFR Part 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating – this subpart applies to organic coatings applied to rolled or coiled sheet metal. Silgan Containers used coiled steel and aluminum as feedstock, but the metal is uncoiled, cut, stamped, and shaped before coatings are applied. Therefore, this subpart does not apply to any surface coating emission unit at Silgan.

40 CFR Part 60, Subpart WW - Standards of Performance for the Beverage Can Surface Coating Industry – this subpart applies only to the coating of two-piece steel or aluminum beverage cans. The St. Joseph Silgan Containers facility does not manufacture beverage cans. Therefore, this subpart does not apply to this facility.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart KKKK – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Cans – this subpart applies to metal can surfacing facilities that use 1,500 gallons per year, or more, of coatings, is located at a major source, or is part of a major source of emissions of HAPs. Silgan Containers has a plantwide emission limit on HAPs of less than 10 tons/year of individual HAP and 25 tons/year of any combination of HAPs. Therefore, this installation is not a major source of HAPs and this subpart does not apply.

40 CFR Part 63 Subpart CCCCCC – National Emissions Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities – this rule applies to gasoline dispensing facilities. Silgan Containers has many tanks, all of which contain material for spray coatings. None contain gasoline. Therefore, Subpart CCCCCC does not apply.

40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources – this subpart applies to the spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium. This facility has one spray coating emission unit, which does not use any coating containing any of the metal HAPs listed. Therefore, this subpart does not apply to this facility.

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.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

Four emission units at this facility meet the requirements listed above: Inside Spray machines (ES-2024), Sheet Coat line 1 (ES-3310), Sheet Coat line 2 (ES-3320), and Sheet Coat line 3 (ES-3340). All four are subject to an emission limitation as defined in 40 CFR Part 64 (RTO with a defined destruction efficiency), use of control device (RTO), and VOC/HAP emissions over major source threshold. Permit Conditions 2 (CP #122008-001) and 3 (CP#072013-013A) require continuous monitoring of the RTO operating temperature, which meets the requirements of Part 64. Therefore, no additional compliance monitoring is needed.

Other Regulatory Determinations

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)
CO	12.61
HAP	0.33
NO _x	15.01
PM ₁₀	16.48
PM ₂₅	16.48
SO _x	0.09
VOC	379.83

HAP	Potential to Emit (tons/yr)	HAP	Potential to Emit (tons/yr)
Formaldehyde	0.02	Xylene	0.00
MBK	0.01	Ethylbenzene	0.00
Glycol Ether	0.01	Methyl Alcohol	0.28

Each emission unit was evaluated at 8,760 hours of annual operation unless otherwise noted. PTE includes emission limits in all federally-enforceable Permit Conditions from this document. Emissions from storage tanks are negligible, based on size and contents, and not included in the total.

All combustion sources use natural gas. Emissions for all combustion sources were calculated using emission factors from WebFIRE and 1020 mmBTUs/mmft³. All emissions were calculated using 8760 hours.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

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

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

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

Response to Public Comments

A draft of the Part 70 Operating Permit for Silgan Containers Manufacturing Corporation was placed on public notice on March 31, 2016, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The four comments are addressed in the order in which they appear within the letter.

Comment #: 1

Plant wide Permit Condition PW001 incorporates the applicable requirements from Construction Permit #072013-013. Emission limitations 1), 2), and 3) limit the individual hazardous air pollutant(s); the combination of all HAP; and volatile organic compounds respectively. However, emission limitations 1), 2), and 3) do not identify the emission units which are subject to these specified limitations. The monitoring/recordkeeping requirements, in Permit Condition PW001 do, however, require the permittee to use Attachment F, Attachment G and Attachment H (or equivalent) to calculate and record monthly and 12-month rolling totals of HAP and VOC to verify compliance with the emission limitations. Attachment F, G and H do include the emission points subject to the monitoring and record keeping requirements, however, the emission points included on these attachments are not the same emission units as listed in Special Condition 2 and Special Condition 3 of Permit to Construct #072013-013. Therefore, EPA recommends MDNR include all the emission units specified in Permit to Construct #072013-013 in Plant wide Permit Condition PW001 and modify Attachments F,G, and H to include all equipment units with emission limitations according to Permit to Construct #072013-013.

Response to Comment:

The emission limitations from CP #072013-013 apply to all emission points at the installation. The Air Program interprets Tables 1 & 2 to be a list of HAP- and VOC-emitting units at the time the permit was written and not a fixed list of units to which the limitations apply. Similarly, the plantwide emission limits in the operating permit apply to all emission units at the installation whether identified by emission point label or not. The units which actually emit HAPs or VOCs may change over time due to, for example, replacing VOC-based ink with water-based ink. The Attachments are provided for the installation's convenience and may be changed or adapted as necessary.

Comment #: 2

The operational limitation requirements in Permit Condition 2 appear to be identical to the emission limitation 4 in Plant wide Permit Condition PW001. Also, the monitoring/recordkeeping/reporting requirement in Permit Condition 2 is identical to reporting requirement 2) in Plant wide Permit Condition PW001. Therefore, it appears that MDNR could simplify the Silgan – St. Joseph, operating permit by combining Permit Condition 2 and Plant wide Permit Condition PW001.

Response to Comment:

Permit Condition 2 defined operating parameters for an end seal applicator in CP#062004-015. The equipment has been dismantled and the Special Conditions of the construction permit no longer apply. Permit Condition 2 mistakenly applied one Special Condition to an incorrect unit. Accordingly, Permit Condition 2 has been removed and an explanation placed in the Permit History section of the Statement of Basis.

Comment #: 3

The Statement of Basis includes a discussion regarding Compliance Assurance Monitoring (CAM) Applicability and describes the fact that the regenerative thermal oxidizer (RTO) continuous monitoring

requirements in Permit Condition 3 satisfy the CAM requirements. However, both Permit Condition 1 and Permit Condition 4 also require the use of an RTO as a control device necessary to meet the VOC limitations, yet there is no equivalent discussion or CAM inclusion. Therefore EPA recommends MDNR either describe how the continuous monitoring in Permit Condition 1 and Permit Condition 4 satisfies CAM or MDNR needs to include CAM requirements in Permit Condition 1 and Permit Condition 4.

Response to Comment:

The CAM section of the Statement of Basis was revised to include ES-2024, which is also subject to CAM monitoring. ES-2024 also meets CAM requirements by monitoring temperature. ES-2010 and -2020 are not subject to CAM because their precontrolled emissions are well below the major source threshold for both VOCs and HAPs.

Comment #: 4

The Statement of Basis has a listing of construction permits which were referred to in the preparation of this draft operating permit. The Statement of Basis also includes a construction permit history which describes the applicability of each construction permit special conditions to be included in the operating permit. However, Permit to Construct #062004-015 is listed as a permit reference document but is not included in the construction permit history. Permit to Construct #062004-015 as two (2) special conditions that do not appear in the draft operating permit and there is no obvious discussion as to why these special conditions have been excluded. Additionally, a “No Permit Required” determination, issued by MDNR under project 2014-12-072, establishes a production limit for Silgan – St. Joseph of 1,650 cans per minute (cpm). The Statement of Basis does not list this “No Permit Required” determination as a permit reference document and the established production throughput rate limit of 1,650 cpm is not shown as a permit condition. EPA recommends MDNR review all construction permit activity regarding Silgan – St. Joseph and verify that all applicable requirements have been included in the operating permit.

Response to Comment:

Discussion of Construction Permit #062004-015 was added to the Permit History section of the Statement of Basis (see also response to Comment #2). The production limit of 1,650 cans was included in the MHDR calculations, though not specifically mentioned.

Mr. Tom Peterson
Silgan Containers Manufacturing Corporation
P.O. Box 4488
St. Joseph, MO 64504

Re: Silgan Containers Manufacturing Corporation, 021-0064
Permit Number: OP2016-014

Dear Mr. Peterson:

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:BAJj

Enclosures

c: PAMS File: 2011-05-029