INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2017-093
Expiration Date: JAN 04 2023
Installation ID: 510-1407
Project Number: 2016-12-016

Installation Name and Address
Southern Metal Processing
6323 South Broadway
St. Louis, MO 63011
St. Louis City County

Parent Company's Name and Address
R & S Metals LLS
6323 South Broadway
St. Louis, MO 63011

Installation Description:
Southern Metal Processing collects, sorts, and sells mostly non-ferrous metal. The installation has a copper wire reclamation process which processes scrap metal for recycling by passing the scrap copper wire through a natural gas-fired reclamation furnace which burns off the wire coating. A voluntary limitation of less than 100 tons of PM10 emissions from the entire facility was taken in order to qualify for an intermediate permit. The installation is not subject to any NSPS or MACT regulations. Mobile sources such as propane lift trucks and diesel loaders and fork lifts are operated at this location but are not included in this Operating Permit.

Prepared by:
Justin Spasovski
Operating Permit Unit

Director or Designee
Department of Natural Resources
JAN 04 2018
Effective Date
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I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-02</td>
<td>Copper Reclamation Furnace (No. 2)</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Description of Emission Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ferrous metals collection and transfer</td>
</tr>
<tr>
<td>Crusher and bailer system</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:
1) The permittee shall emit less than 100 tons per year of particulate matter less than ten microns (PM$_{10}$) from the entire installation in any consecutive 12-month period.

Operational Limitations/Equipment Specifications:
1) The permittee shall operate the afterburner whenever the copper reclamation furnace is operational.
2) The afterburner shall be maintained and operated in accordance with the equipment specifications of the manufacturer.

Monitoring:
The permittee shall monitor the PM$_{10}$ emissions from the entire installation.

Recordkeeping:
1) The permittee shall record the PM$_{10}$ emissions on a monthly basis (see Attachment E).
2) The permittee shall use the provided attachments, or similar recordkeeping, to demonstrate compliance with this permit condition.
3) These records shall be kept for five (5) years and made available for inspection by the 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, or AirComplianceReporting@dnr.mo.gov no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) listed above.
2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification as required by Section IV 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 on the date of permit issuance.

<table>
<thead>
<tr>
<th>PERMIT CONDITION 001</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-02</td>
<td>Copper Reclamation Furnace (No. 2)</td>
</tr>
</tbody>
</table>

**Emission Limitations:**

1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20 percent.

2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 40 percent.

**Monitoring:**

1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.

2) The permittee shall maintain the following monitoring schedule:
   a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
   b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then,
   c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
   d) Issuance of this renewal operating permit does not restart the schedule.

3) If the permittee 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 Method 22 observation results (See Attachment B and C), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
b) All emission units from which visible emissions occurred, and
c) Whether the visible emissions were normal for the process.

2) The permittee shall maintain all records of any equipment inspections, maintenance and malfunctions (See Attachment E).

3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition (See Attachment D).

4) The permittee shall utilize Attachments B, C, and D, or an equivalent form that contain logs satisfying these recordkeeping requirements and to be used to satisfy the compliance of this requirement.

5) The permittee shall make these records available immediately for inspection to Department of Natural Resources or Kansas City Air Quality Program personnel upon request.

6) The permittee shall maintain the records for five years.

**Reporting:**

1) The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov no later than ten days after the permittee determines that the emission unit(s) exceeded the opacity limit.

2) The permitted shall report any deviations from the operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.
IV. Core Permit Requirements

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

**City of St. Louis Ordinance 68657, §16 Open Burning Restrictions**
1) No person shall cause, suffer, allow or permit the open burning of refuse.
2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

**10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**
1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

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

**10 CSR 10-6.060 Construction Permits Required**

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

**10 CSR 10-6.065 Operating Permits**

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

**10 CSR 10-6.100 Alternate Emission Limits**

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

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

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

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

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

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

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

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.
10 CSR 10-6.150 Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors
This is a State Only permit requirement.
No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

Emission Limitation:
1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

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 B, 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 equipment malfunctions contributed to an exceedance.
3) 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 10-6.280 Compliance Monitoring Usage**

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
iii) 10 CSR 10-6.070, “New Source Performance Standards”;
iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

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

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

10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

10 CSR 10-5.130 Certain Coals to be Washed

The permittee shall not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption in the St. Louis metropolitan area or use or consume in the said area any coal which as mined containing in excess of 2.0% sulfur or 12.0% ash calculated as described in 10 CSR 10-5.110, unless it has been cleaned by a process known as "washing" so that it shall contain no more than 12.0% ash on a dry basis. The term "washing" is meant to include purifying, cleaning, or removing impurities from coal by mechanical process, regardless of cleaning medium used.

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

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.

d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.

d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).

e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.

f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

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

**10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

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

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

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit.

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.

<table>
<thead>
<tr>
<th>10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)</th>
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</thead>
<tbody>
<tr>
<td>If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.</td>
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</tbody>
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<table>
<thead>
<tr>
<th>10 CSR 10-6.065(5)(C)1.A General Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.</td>
</tr>
<tr>
<td>5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.</td>
</tr>
<tr>
<td>6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
</tr>
</tbody>
</table>
10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

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

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

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

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

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

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

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

### 10 CSR 10-6.065(5)(C)5 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted installation’s operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
   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.

### 10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Dan Kweskin, President. On November 15, 2017, the Air Pollution Control Program was informed that Bret Robinson, President, is now the responsible official. 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.
This permit may be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

Attachments follow.
## Attachment A
Visible Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Emission Source</th>
<th>Visible Emissions</th>
<th>Excess Emissions</th>
<th>Cause</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>Yes¹</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

¹If there are visible emissions, the permittee shall complete the excess emissions columns.
## Attachment B
Fugitive Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>Abnormal Emissions</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Beyond Boundary</td>
<td>Cause</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
## Attachment C

### Method 9 Opacity Emissions Observations

<table>
<thead>
<tr>
<th>Company</th>
<th>Observer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Observer Certification Date</td>
</tr>
<tr>
<td>Date</td>
<td>Emission Unit</td>
</tr>
<tr>
<td>Time</td>
<td>Control Device</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Hour</th>
<th>Minute</th>
<th>Seconds</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>0</td>
<td>15</td>
<td>30</td>
</tr>
<tr>
<td>0</td>
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</tbody>
</table>

### SUMMARY OF AVERAGE OPACITY

<table>
<thead>
<tr>
<th>Set Number</th>
<th>Time</th>
<th>Opacity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Start</td>
<td>End</td>
</tr>
</tbody>
</table>

Readings ranged from _________ to _________ % opacity.

Was the emission unit in compliance at the time of evaluation?  

YES  NO  Signature of Observer
## Attachment D

Inspection/Maintenance/Repair/Malfunction Log

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
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</tr>
</tbody>
</table>
**Attachment E**

Monthly and Yearly PM$_{10}$ Tracking Record

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

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment Description (Emission Unit #)</td>
<td>Amount of Throughput (tons)</td>
<td>PM$_{10}$ Emissions (tons)</td>
</tr>
</tbody>
</table>

(a) Total PM$_{10}$ Emissions Calculated for this Month in Tons:

(b) 12-Month PM$_{10}$ Emissions Total from Previous Month’s Attachment E, in Tons:

(c) Monthly PM$_{10}$ Emissions Total (a) from Previous Year’s Attachment E, in Tons:

(d) Current 12-Month Total of PM$_{10}$ Emissions in Tons: $[(a) + (b) - (c)]$

**Instructions:**

(a) Summation of [Column 3] in tons;

(b) 12-Month PM$_{10}$ emissions total (d) from last month’s Attachment E, in tons;

(c) Monthly PM$_{10}$ emissions total (a) from previous year’s Attachment E, in tons;

(d) Calculate the new 12-Month PM$_{10}$ emissions total. A 12-Month PM$_{10}$ emissions total (d) of less than 100.0 tons indicates compliance. PM10 emissions = throughput x EF / 2000

Note: PM$_{10}$ emissions shall be calculated using an emission factor of 253 lb PM$_{10}$/ton charged, from webFIRE for SCC 30400208, unless otherwise approved by the Missouri Department of Natural Resources Air Pollution Control Program.
STATEMENT OF BASIS

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

INSTALLATION DESCRIPTION
Southern Metal Processing collects, sorts, and sells mostly non-ferrous metal. The installation has a copper wire reclamation process which processes scrap metal for recycling by passing the scrap copper wire through a natural gas-fired reclamation furnace which burns off the wire coating. Other processes include ferrous metals collection and transfer and crusher and bailer system. A voluntary limitation of less than 100 tons of PM10 emissions from the entire facility was taken in order to qualify for an intermediate permit. The installation is not subject to any NSPS or MACT regulations. Mobile sources such as propane lift trucks and diesel loaders and fork lifts are operated at this location but are not included in this Operating Permit. This facility is not on the list of named installations therefore fugitive emissions are not included in the calculation of PTE.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>0.45</td>
</tr>
<tr>
<td>NOx</td>
<td>4.09</td>
</tr>
<tr>
<td>PM10</td>
<td>&lt;100^2</td>
</tr>
<tr>
<td>PM2.5</td>
<td>0.34</td>
</tr>
<tr>
<td>SOx</td>
<td>56.06</td>
</tr>
<tr>
<td>VOC</td>
<td>2.62</td>
</tr>
</tbody>
</table>

^1Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.
^2Permit Condition PW001 limits PM10 emission plantwide.

Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM2.5)</td>
<td>0.035</td>
<td>0.043</td>
<td>0.043</td>
<td>0.043</td>
<td>0.043</td>
</tr>
<tr>
<td>Sulfur Oxides (SOx)</td>
<td>5.75</td>
<td>7.18</td>
<td>7.18</td>
<td>7.16</td>
<td>7.04</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>0.42</td>
<td>0.52</td>
<td>0.52</td>
<td>0.52</td>
<td>0.51</td>
</tr>
<tr>
<td>Volatile Organic Compounds(VOC)</td>
<td>0.027</td>
<td>0.033</td>
<td>0.033</td>
<td>0.033</td>
<td>0.033</td>
</tr>
</tbody>
</table>
### Pollutants

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>0.046</td>
<td>0.057</td>
<td>0.057</td>
<td>0.057</td>
<td>0.056</td>
</tr>
</tbody>
</table>

### Permit Reference Documents

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

1) Intermediate Operating Permit Application, received December 12, 2016;
2) 2016 Emissions Inventory Questionnaire, received March 24, 2017;
4) webFIRE; and
5) All documents listed in Construction Permit History section.

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

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

None

### Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.240 *Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area*

This rule was rescinded July 30, 2014.

10 CSR 10-6.250 *Asbestos Projects – Registration, Abatement, Notification, Inspection, Demolition, and Performance Requirements*

This rule is not applicable because the installation does not perform the regulated activities.

### Construction Permit History

The following construction permits have been issued to this installation:

City of St. Louis Construction Permit issued October 3, 2005.

- Applied for like-kind replacement of Copper Reclamation Furnace (No. 2)
- Replacement emission unit was determined to not involve any appreciable change in either the quality or nature, or any increase in potential to emit or the effect on air quality, of the emissions of any air contaminates.
- The Copper Reclamation Furnace (No. 2) was manufactured in 1977 and installed at the facility in 1980. The unit is considered an incinerator under Missouri state regulations, but is also considered a grandfathered unit and does not require a construction permit from the ACPC. Likewise, the like-kind replacement does not require a new construction permit.
New Source Performance Standards (NSPS) Applicability
40 CFR Part 60, Subpart E Standards of Performance for Incinerators
This rule does not apply because the maximum charging rate of each incinerator (copper reclamation furnace) is 24 tons/day, which is less than the 50 tons/day threshold in 60.50(a).

40 CFR Part 60, Subpart P Standards of Performance for Primary Copper Smelters
This rule does not apply because the installation does not meet the definition of a primary copper smelter.

40 CFR Part 60, Subpart CCCC Standards of Performance for Commercial and Industrial Solid Waste Incineration Units
This rule does not apply to the Copper Reclamation Furnace (No. 2) as it does not meet the definition of an incinerator or a commercial and industrial solid waste incineration (CISWI) unit as defined by this subpart.

40 CFR Part 60, Subpart EEEE Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or reconstruction is Commenced on or After June 16, 2006
This rule does not apply to the Copper Reclamation Furnace (No. 2) as it does not meet the definition of an other solid waste incineration (OSWI) unit as defined in this subpart.

Maximum Achievable Control Technology (MACT) Applicability
This rule does not apply to the Copper Reclamation Furnace (No. 2) as the material burned does not meet the definition of hazardous waste.

40 CFR Part 63, Subpart QQ National Emission Standards for Hazardous Air Pollutant Emissions for Primary Copper Smelting
This rule does not apply because the installation does not meet the definition of a primary copper smelter.

40 CFR Part 63, Subpart EEEEE National Emissions Standards for Hazardous Air Pollutants for Primary Copper Smelting Area Sources
This rule does not apply because the installation does not meet the definition of a primary copper smelter.

40 CFR Part 63, Subpart FFFFFF National Emissions Standards for Hazardous Air Pollutants for Secondary Copper Smelting Area Sources
This rule does not apply because the installation does not meet the definition of a secondary copper smelter.

This rule does not apply because the installation does not meet the definition of a secondary nonferrous metal processing source.
This rule does not apply to the installation because it does not meet the definition of a copper foundry as defined in this subpart.

**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.

**Greenhouse Gas Emissions**
Note that this source may be subject to the Greenhouse Gas Reporting Rule. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting [http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html](http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html).

**Other Regulatory Determinations**
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions
The incinerator is excluded from this rule because it is fueled exclusively with natural gas.

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes
According to 6.400(1)(A)15., any unit subject to a federally enforceable requirement to install, operate, and maintain a particulate matter control device system that controls at least 90% of particulate matter emissions is exempt from this rule. This Operating Permit contains a federally enforceable requirement that the copper reclamation furnaces operate and maintain the afterburners, which control at least 90% of the particulate matter emissions. Therefore, these units are exempt from this rule.

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating
The incinerator is excluded from this rule because it is not an indirect heating unit.

**Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.
1) The specific pollutant regulated by that rule is not emitted by the installation.
2) The installation is not in the source category regulated by that rule.
3) The installation is not in the county or specific area that is regulated under the authority of that rule.
4) The installation does not contain the type of emission unit which is regulated by that rule.
5) The rule is only for administrative purposes.

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

On November 7, 2017, we received five comments from Shirley Wolverson, Environmental Specialist, Missouri Department of Natural Resources St. Louis Regional Office. The comments are addressed in the order in which they appear within the letter(s).

Comment #1: Open Burning in Core Permit Requirements: Open burning is not allowed in the City of St. Louis, and permits are not issued for open burning in the City of St. Louis. Period. Please refer to the SIP as well as the City sections of 6.045: the City Ordinance is part of the SIP. Also refer to the Chemisphere and PQ OP’s currently on public notice for the following wording that I would suggest for all City of St. Louis operating permits:

City of St. Louis Ordinance 68657, §16 Open Burning Restrictions
1) No person shall cause, suffer, allow or permit the open burning of refuse.
2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

Response to Comment: The above wording has been added to the Core Permits section and replaced 10 CSR 10-6.045.

Comment #2: Burn-off oven Opacity: Nowhere in the St. Louis Metropolitan non-attainment area is 60% opacity allowed. Refer to 6.220 tables. I don’t know why the old 2012 OP had that requirement, but it might explain why it is always smoking…

Response to Comment: Changes have been made to Permit Condition 001 Emission Limitation 2) to correctly reflect the requirement of (3)(A)2.

Comment #3: Incinerators: Is the Program considering the “furnace” to not be an incinerator and to not require a construction permit with federally enforceable control requirements?

Response to Comment: The Program does consider the furnace to be an incinerator. The furnace was permitted to be installed in 1980. Equipment constructed before May 13, 1982 are considered grandfathered and does not require a construction permit from the APCP. Likewise, the like-kind replacement does not require a new construction permit. Wording has been added to the Construction Permit History section of the Statement of Basis to clarify this.

Comment #4: Stack Emissions: I have attached copies of the stack test reports used in 1991 and 2005 for the “furnace” and like-kind replacement. They only have a control efficiency for VOC, and the 1997 operating permit limited the operating hours so the SOx would be de minimis. I doubt if that was the correct place to limit SOx, but there it is. Without the operating hours limit, according to the application, the facility is minor for SOx and removing that limit from the subsequent OP’s seems wrong.
Additionally, PM10 emissions were never considered in the previous applications to be major, and were not limited by previous OP’s, so I am not sure where that data came from. The primary source of PM from the facility is the extra high level of traffic on S. Broadway and the extensive handling of scrap adjacent to the road. Yes, fugitive. At any rate, the afterburner requirement for the PM10 plant wide limitation seems out of place, and more appropriately placed under the furnace. While I agree that the unit is probably emitting PM, and that the opacity readings are “controlling” for that, without a stack test that provides control efficiency for the afterburner it seems a stretch to claim it.

I note that the Statement of Basis shows 48 tons PTE for SOx, this is the same as the old application; however that was based on less than 8760 hours per year. The Statement of Basis also applies a 90% CE for PM10 to the afterburner; however, as I mentioned above that CE is for VOC according to the old application. Do you have more current stack test or other data for that furnace?

**Response to Comment:** The hour of operation limit was put into place to keep SOX emissions under major levels from two copper reclamation furnaces. One of the furnaces was removed from the facility. The limit was dropped because SOX limit were below major levels from the one furnace without the limit. The PTE was mistakenly calculated with the 7,500 hour limit, and the table has been updated with the correct PTE calculated with 8,760 hours of operation.

Emissions for PM10 from the copper reclamation furnace were calculated using an emission factor from WebFIRE using SCC code 30400208. The emission factor found in the 1991 stack test was not used in this permit or the previous permit as not all documentation was submitted with the stack test to MDNR to give enough confidence in the stack test emission factor. The facility agreed on not using the stack test emission factor.

**Comment #5:** 6.170 Fugitive Emissions: Due to the proximity of “any handling, transporting or storing of any material; construction, repair, construction or use of a road, driveway or open area; or operation of a commercial or industrial installation” AND “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;” AND fugitive particulate matter emissions from the “furnace” and scrap yard can easily remain “visible in the ambient air beyond the property line of origin” due to their proximity to the public thoroughfare – I wish the fugitive dust rule, 10 CSR 10-6.170 with observations and recordkeeping requirements, could be incorporated into the Unit Specific limitations rather than buried in the Core Permit Requirements.

**Response to Comment:** 10 CSR 10-6.170 is an applicable regulation to Southern Metal Processing and the facility must follow the requirements no matter where the regulation appears in the operating permit.
JAN 0 4 2018

Mr. Bret Robinson
Southern Metal Processing
6323 South Broadway
St. Louis, MO 63011

Re: Southern Metal Processing, 510-1407
Permit Number: OP2017-093

Dear Mr. Robinson

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jsj

Enclosures

c: PAMS File: 2016-12-016