

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: OP2017-090

Expiration Date: DEC 08 2022

Installation ID: 091-0005

Project Number: 2016-07-041

Installation Name and Address

Smith Flooring, Inc. - Mountain View
Facility
1501 W. Hwy 60
Mountain View, MO 65548
Howell County

Parent Company's Name and Address

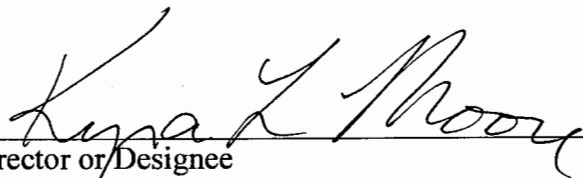
Smith Flooring, Inc. - Mountain View
Facility
1501 W. Hwy 60
Mountain View, MO 65548

Installation Description:

Smith Flooring Inc.-Mountain View Facility manufactures hardwood floors. The processes include log debarking, kiln drying, sawing, planing, grinding, sawdust transfer and storage. The installation uses a 27 MMBtu/hr wood-fired boiler for indirect heating of processes and plant space heating. The installation has accepted a voluntary limitation of less than 100 tons per year of particulate matter less than or equal to ten microns in diameter (PM₁₀) to qualify for this Intermediate Operating Permit.



Prepared by:
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Operating Permit Unit



Director or Designee
Department of Natural Resources

DEC 08 2017

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.

Emission Source	Description	Control Device
EP-01	Log Sawing-Rip Saws; 18 tph	CD-01 (Baghouse), CD-02 (Baghouse)
	Log Sawing-Rough knot Saws; 18 tph	CD-02 (Baghouse)
	Log Sawing-Planers; 16 tph	
	Log Sawing-Finish Saws; 16 tph	
	Log Sawing-End Matchers; 16 tph	
	Log Sawing-Grinder; 16 tph	
EP-02	Log Sawing-Planer; 3 tph	CD-01 (Baghouse)
	Log Sawing-Finish Saws (2); 2 tph	
EP-03	Wood-fired Steam Boiler; 27 MMBtu/hr; installed 1988	CD-03 (MultiCyclone)
EP-04	Sawdust Storage/Loadout-Silo (enclosed); 1 tph	CD-04 (Partial Enclosure)
EP-07	Gasoline Storage Tank, less than 1,000 gal	
EP-10	Sawmill Process-Sawdust Loadout Blower, truck blower (enclosed); 1 tph	CD-05 (Partial Enclosure)
EP-12	Sawmill Process-Sawdust Loadout Blower, truck blower (enclosed); 1 tph	CD-05 (Partial Enclosure)
EP-13	Sawmill Process-Sawmill bin; 2 tph	CD-06 (MultiCyclone)
EP-15	Sawdust Storage/Loadout-Silo; 5 tph	CD-07 (MultiCyclone)
EP-16	Log Sawing-Grinder (Wood Chip Waste); 5 tph	CD-02 (Baghouse)
EP-17	Log Sawing-Pre Surfacers; 24 tph	
EP-18	Drag Conveyor #1; 20 tph	CD-08 (Baghouse)
	Rotex Screener; 20 tph	
	Drag Conveyor #2; 20 tph	
	Pellet Elevator; 20 tph	
	Pellet Storage Silo; 20 tph	
	Silo Discharge Conveyor; 20 tph	
	Elevator and Leg; 20 tph	
	Drag Conveyor #3; 20 tph	
	Pellet Screener; 20 tph	
	Drag Conveyor #4; 20 tph	
	Bagging Machine; 20 tph	
	Screw Conveyor #1; 20 tph	
	Hammermill; 20 tph	
	Screw Conveyor #2; 20 tph	
	Bucket Elevator; 20 tph	
EP-19	Screw Conveyor PM #1; 10 tph	CD-09 (Cyclone)
	Pellet Mill Prebin #1; 10 tph	
	Pellet Mill #1; 10 tph	
	Screw Conveyor PM #2; 10 tph	

Emission Source	Description	Control Device
EP-19	Pellet Mill Prebin #2; 10 tph	CD-09 (Cyclone)
	Pellet Mill #2; 10 tph	
	Drag Conveyor #5; 20 tph	
	Pellet Cooler; 20 tph	

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.

Emission Source	Description
EP-06	Diesel Storage Tank, less than 1,000 gal
EP-08	Sawmill Process-Sawmill Saws (Scrag Saw); 15 tph
EP-09	Log Sawing-Grinder; 1 tph
EP-11	Log Sawing-Grinder; 1 tph
EP-14	Log Debarking; 15 tph

II. Plant Wide Emission Limitations

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

Recordkeeping:

1. The permittee shall record all required record keeping in an appropriate format.
2. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
3. The permittee shall keep a copy of this operating permit and review on site as well as copies of all issued construction permits and reviews on site.
4. All records must be kept for a minimum of 5 years and be made available to Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

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

The permittee shall emit less than 100 tons per year of particulate matter less than or equal to ten microns in diameter (PM₁₀) from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

The permittee shall monitor and record monthly and 12-month rolling total PM₁₀ emissions from the entire installation using Attachment B1 or an equivalent form.

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.

PERMIT CONDITION 001		
10 CSR 10-6.060 Construction Permits Required Construction Permit #112001-002, Issued October 22, 2001		
Emission Source	Description	Control Device
EP-16	Log Sawing-Grinder (Wood Chip Waste); 5tph	CD-02 (Baghouse)

Operational Limitations:

The permittee shall not use the grinder machine to process waste from off-site. [Special Condition 2A]

PERMIT CONDITION 002		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources		
Emission Source	Description	Control Device
EP-03	Wood-fired steam boiler; 27 MMBtu/hr; installed 1988	CD-03 (MultiCyclone)

General Requirements and Standards:

1. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11205(a)]
2. The permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to MACT JJJJJ that applies to their boiler. An energy assessment completed on or after January 1, 2008, that meets the requirements in Table 2 to MACT JJJJJ, satisfies the energy assessment portion of this requirement. [§63.11201(b)]
 - a) Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223. [Table 2, Item 6]
 - b) The energy assessment must include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237: [Table 2, Item 16]
 - (i) A visual inspection of the boiler system
 - (ii) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints
 - (iii) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator

- (iv) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
- (v) A list of major energy conservation measures that are within the facility's control
- (vi) A list of the energy savings potential of the energy conservation measures identified
- (vii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

Continuous Compliance Requirements:

1. The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in §63.11223(b)(1) through (7). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. [§63.11223(b)]
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, but not to exceed 36 months from the previous inspection). [§63.11223(b)(1)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(3)]
 - d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(4)]
 - e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). [§63.11223(b)(5)]
 - f) Maintain on-site and submit, if requested by the Administrator, biennial report containing the information in §63.11223(b)(6)(i) through (iii). [§63.11223(b)(6)]
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]
 - (iii) The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. [§63.11223(b)(6)(iii)]
 - g) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [§63.11223(b)(7)]

Recordkeeping/Reporting:

1. The permittee must submit the notifications specified in §63.11225(a)(1) to the Administrator when necessary. [§63.11225(a)]
 - a) The permittee must submit all of the notifications in §§63.7(b); 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply by the dates specified in those sections. [§63.11225(a)(1)]

2. The permittee may prepare a biennial compliance report as specified in §63.11225(b)(1) through (3). [§63.11225(b)]
 - a) Company name and address. [§63.11225(b)(1)]
 - b) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. [§63.11225(b)(2)]
 - c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [§63.11225(b)(3)]
3. The permittee must maintain the records specified in §63.11225(c)(1) through (5). [§63.11225(c)]
 - a) As required in §63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that they submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that they submitted. [§63.11225(c)(1)]
 - b) The permittee must keep records to document conformance with the work practices and management practices required by §63.11214 and §63.11223 as specified in §63.11225(c)(2)(i) through (vi). [§63.11225(c)(2)]
 - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [§63.11225(c)(2)(i)]
 - (ii) If the permittee combusts non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1), they must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If they combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), they must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c), they must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, the permittee must keep records documenting that the material is a listed non-waste under §241.4. [§63.11225(c)(2)(ii)]
 - c) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [§63.11225(c)(4)]
 - d) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [§63.11225(c)(5)]
4. The permittee's records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for five (5) years following the date of each recorded action. They must keep each record on-site for at least two years after the date of each recorded action. They may keep the records off site for the remaining three years. [§63.11225(d)]
5. If the permittee intends to commence or recommence combustion of solid waste, they must provide 30 days prior notice of the date upon which they will commence or recommence combustion of solid waste. The notification must identify: [§63.11225(f)]
 - a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice. [§63.11225(f)(1)]
 - b) The currently applicable subcategory under this subpart. [§63.11225(f)(2)]

- c) The date on which the permittee became subject to the currently applicable emission limits. [§63.11225(f)(3)]
- d) The date upon which the permittee will commence combusting solid waste. [§63.11225(f)(4)]

PERMIT CONDITION 003		
10 CSR 10-6.060 Construction Permits Required Construction Permit #102014-014, Issued October 24, 2014		
Emission Source	Description	Control Device
EP-18	Drag Conveyor #1; 20 tph	CD-08 (Baghouse)
	Rotex Screener; 20 tph	
	Drag Conveyor #2; 20 tph	
	Pellet Elevator; 20 tph	
	Pellet Storage Silo; 20 tph	
	Silo Discharge Conveyor; 20 tph	
	Elevator and Leg; 20 tph	
	Drag Conveyor #3; 20 tph	
	Pellet Screener; 20 tph	
	Drag Conveyor #4; 20 tph	
	Bagging Machine; 20 tph	
	Screw Conveyor #1; 20 tph	
	Hammermill; 20 tph	
	Screw Conveyor #2; 20 tph	
Bucket Elevator; 20 tph		
HT Pellet Pre Bin; 20 tph		
EP-19	Screw Conveyor PM #1; 10 tph	CD-09 (Cyclone)
	Pellet Mill Prebin #1; 10 tph	
	Pellet Mill #1; 10 tph	
	Screw Conveyor PM #2; 10 tph	
	Pellet Mill Prebin #2; 10 tph	
	Pellet Mill #2; 10 tph	
	Drag Conveyor #5; 20 tph	
	Pellet Cooler; 20 tph	

Emission Limitations:

The permittee shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month period from the emission sources listed in this permit condition. [Special Condition 1A]

Monitoring/Recordkeeping:

The permittee shall use Attachment B2, or an equivalent tracking method, to track PM₁₀ emissions from the emission sources of this permit condition.

PERMIT CONDITION 004		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit #112001-002, Issued October 22, 2001		
Construction Permit #102014-014, Issued October 24, 2014		
Emission Source	Description	Control Device
EP-16	Log Sawing – Grinder (Wood Chip Waste); 5 tph	CD-02 (Baghouse)
EP-17	Log Sawing – Pre Surfacers ; 24 tph	
EP-18	Drag Conveyor #1 20 tph	CD-08 (Baghouse)
	Rotex Screener; 20 tph	
	Drag Conveyor #2; 20 tph	
	Pellet Elevator; 20 tph	
	Pellet Storage Silo; 20 tph	
	Silo Discharge Conveyor; 20 tph	
	Elevator and Leg; 20 tph	
	Drag Conveyor #3; 20 tph	
	Pellet Screener; 20 tph	
	Drag Conveyor #4; 20 tph	
	Bagging Machine; 20 tph	
	Screw Conveyor #1; 20 tph	
	Hammermill; 20 tph	
	Screw Conveyor #4; 20 tph	
	Bucket Elevator; 20 tph	
HT Pellet Pre Bin; 20 tph		
EP-19	Screw Conveyor PM #1; 10 tph	CD-09 (Cyclone)
	Pellet Mill Prebin #1; 10 tph	
	Pellet Mill #1; 10 tph	
	Screw Conveyor PM #2; 10 tph	
	Pellet Mill Prebin #2; 10 tph	
	Pellet Mill #2; 10 tph	
	Drag Conveyor #5; 20 tph	
Pellet Cooler; 20 tph		

Operational Limitations:

1. The baghouses and cyclone shall be used to control particulate emissions from the emission sources as indicated in this permit condition. [112001-002 S.C. 1A; 102014-014 S.C. 2A & 3A]
2. The control devices shall be operated and maintained according to their manufacturer's specifications. The operating pressure drop shall be maintained within the design conditions specified in their manufacturer's performance warranties. [112001-002 S.C. 1A & 1B; 102014-014 S.C. 2B, 2D & 3B]
3. The control devices shall be equipped with a gauge or meter which indicates the pressure drop across the control device. These gauges will be located such that Department of Natural Resources' employees may easily observe them. [112001-002 S.C. 1A; 102014-014 S.C. 2B & 3B]
4. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [102014-014 S.C. 2C]
5. If the pressure drop falls out of the normal operating range for any of the control devices, corrective action shall be taken as soon as practicable but within no more than eight (8) hours to return the

pressure drop to normal. If the pressure drop has not been returned to normal at the end of eight (8) hours, the emission units shall be shut-down until the baghouses are repaired.

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the control devices at least once daily using Attachment D or an equivalent. [112001-002 S.C. 1B; 102014-014 S.C. 2D & 3C]
2. The permittee shall maintain a copy of the control devices' manufacturer's performance warranties on site. [112001-002 S.C. 3D; 102014-014 S.C. 2E & 3D]
3. The permittee shall maintain an operating and maintenance log for the control devices using Attachment G or an equivalent, which will include the following: [112001-002 S.C. 1C; 102014-014 S.C. 2F & 3E]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

PERMIT CONDITION 005		
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants		
Emission Source	Description	Control Device
EP-01	Log Sawing-Rip Saws; 18 tph	CD-01 (Baghouse), CD-02 (Baghouse)
	Log Sawing-Rough knot Saws; 18 tph	
	Log Sawing-Planers; 16 tph	
	Log Sawing-Finish Saws; 16 tph	
	Log Sawing-End Matchers; 16 tph	
	Log Sawing-Grinder; 16 tph	
EP-02	Log Sawing-Planer; 3 tph	CD-01 (Baghouse)
	Log Sawing-Finish Saws (2); 2 tph	
EP-03	Wood-fired steam boiler; 27 MMBtu/hr; installed 1988	CD-03 (MultiCyclone)
EP-10	Sawmill Process-Sawdust Loadout Blower, truck blower (enclosed); 1 tph	-
EP-12	Sawmill Process-Sawdust Loadout Blower, truck blower (enclosed); 1 tph	-
EP-13	Sawmill Process-Sawmill bin; 2 tph	CD-06 (MultiCyclone)
EP-15	Sawdust Storage/Loadout-Silo; 5 tph	CD-07 (MultiCyclone)
EP-16	Log Sawing-Grinder (Wood Chip Waste); 5tph	CD-02 (Baghouse)
EP-17	Log Sawing-Pre Surfacers; 24 tph	
EP-18	Drag Conveyor #1; 20 tph	CD-08 (Baghouse)
	Rotex Screener; 20 tph	
	Drag Conveyor #2; 20 tph	
	Pellet Elevator; 20 tph	
	Pellet Storage Silo; 20 tph	
	Silo Discharge Conveyor; 20 tph	
	Elevator and Leg; 20 tph	
	Drag Conveyor #3; 20 tph	
	Pellet Screener; 20 tph	
	Drag Conveyor #4; 20 tph	
	Bagging Machine; 20 tph	
	Screw Conveyor #1; 20 tph	
	Hammermill; 20 tph	
	Screw Conveyor #2; 20 tph	
Bucket Elevator; 20 tph		
HT Pellet Pre Bin; 20 tph		
EP-19	Screw Conveyor PM #1 and PM #2	CD-09 (Cyclone)
	Pellet Mill Prebin #1; 10 tph	
	Pellet Mill #1; 10 tph	
	Screw Conveyor PM #2; 10 tph	
	Pellet Mill Prebin #2; 10 tph	
	Pellet Mill #2; 10 tph	
	Drag Conveyor #5; 20 tph	
Pellet Cooler; 20 tph		

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from the sources of this permit condition any visible emissions in excess of 20% opacity.
2. Exception: The permittee is allowed a 60% opacity limitation for one (1) continuous six (6)-minute period in any sixty (60) minutes as measured by the test method used to demonstrate compliance with this rule.

Monitoring/Recordkeeping:

Not required. See Statement of Basis.

PERMIT CONDITION 006		
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants		
Emission Source	Description	Control Device
EP-04	Sawdust Storage/Loadout-Silo (enclosed); 1 tph	-

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from the sources of this permit condition any visible emissions in excess of 20% opacity.
2. Exception: The permittee is allowed a 60% opacity limitation for one (1) continuous six (6)-minute period in any sixty (60) minutes as measured by the test method used to demonstrate compliance with this rule.

Monitoring:

1. The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA 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 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 shall maintain the following monitoring schedule. Reissuance of an operating permit does not reset this 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 E (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 USEPA Method 9 opacity tests performed using Attachment F or an equivalent tracking method.

PERMIT CONDITION 007		
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds ¹		
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions		
Emission Source	Description	Control Device
EP-03	Wood-Fired Steam Boiler; 27 MMBtu/hr; installed 1988	CD-03 (MultiCyclone)

Note: As of issuance of this permit 10 CSR 10-6.261 is a State Only requirement.²

Emission Limitations:

No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds (8 lbs.) of sulfur dioxide per million Btus (MMBtu) actual heat input averaged on any consecutive three (3)-hour time period. [10 CSR 10-6.261(3)(B)1 and 10 CSR 10-6.260(3)(B)2.A]

Compliance Determination:

The potential emissions of the boiler are assumed to be 0.025 lb SO₂/MMBtu (based on the emission factor provided in AP-42 Section 1.6, Table 1.6-2 for wood-fired boilers). These potential emissions are less than that of the rule, thus compliance with this condition is assured under normal operating conditions when burning wood.

Monitoring/Recordkeeping:

1. The permittee shall keep any fuel delivery records, fuel sampling and analysis, performance tests, or other compliance methods approved by the staff director and the U.S. Environmental Protection Agency and incorporated into the state implementation plan (SIP).
2. The permittee must maintain a record of data, calculations, results, records and reports from any performance test, fuel deliveries, and/or fuel sampling tests.
3. The permittee must maintain a record of any applicable monitoring data, performance evaluations, calibration checks, monitoring system and device performance tests, and any adjustments and maintenance performed on this emission source.
4. If the permittee is using fuel delivery records for compliance they must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel

¹ This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, 10 CSR 10-6.260 shall no longer be enforceable.

² This regulation has not yet been adopted into Missouri's SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action on the part of the permittee is needed to revise the operating permit.

deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:

- a) The name, address, and contact information of the fuel supplier;
- b) The type of fuel;
- c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
- d) The heating value of the fuel.

PERMIT CONDITION 008		
10 CSR 10-6.405, Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating		
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)		
Emission Source	Description	Control Device
EP-03	Wood-Fired Steam Boiler; 27 MMBtu/hr; installed 1988	CD-03 (MultiCyclone)

Emission Limitation:

The permittee shall emit less than 0.43 lb/MMBtu of particulate matter from the boiler.

Operational Limitation

The permittee shall not burn bark in the boiler.

Compliance Determination:

The uncontrolled potential emissions from the boiler are 0.40 lb PM/MMBtu (based on the emission factor provided in AP-42 Section 1.6, Table 1.6-1 for dry wood burned in wood-fired boilers). Because the uncontrolled potential emissions are less than the limit, compliance is assured when burning bark-less wood. Thus, monitoring and recordkeeping requirements are not necessary.

PERMIT CONDITION 009		
10 CSR 10-6.065(5) Voluntary Limitation(s)		
Emission Source	Description	Control Device
EP-01	Log Sawing – Rip Saws; 18 tph	CD-01 (Baghouse), CD-02 (Baghouse)
	Log Sawing – Rough Knot Saws; 18 tph	
	Log Sawing – Planers; 16 tph	CD-02 (Baghouse)
	Log Sawing – Finish Saws; 16 tph	
	Log Sawing – End Matchers; 16 tph	
	Log Sawing – Grinder; 16 tph	
EP-02	Log Sawing – Planer; 3 tph	CD-01 (Baghouse)
	Log Sawing – Finish Saws (2); 2 tph	
EP-03	Wood-fired Steam Boiler; 27 MMBtu/hr; installed 1988	CD-03 (MultiCyclone)
EP-13	Sawmill Process – Sawmill Bin; 2 tph	CD-06 (MultiCyclone)
EP-15	Sawdust Storage/Loadout Silo; 5 tph	CD-07 (MultiCyclone)

Operational Limitations:

1. The permittee shall use the baghouses and cyclones to control particulate emissions from the emission sources as indicated in this permit condition.

2. The control devices shall be maintained such that the pressure drop remains in the normal operating range as specified in the manufacturer’s specifications whenever the associated emission points are in operation.
3. All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacturer’s specifications and recommendations.
4. If the pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within no more than eight (8) hours to return the pressure drop to normal. If the pressure drop has not been returned to normal at the end of eight (8) hours, the emission units shall be shut-down until the baghouses are repaired.

Monitoring/Recordkeeping:

1. The permittee shall retain a copy of the control devices’ manufacturer’s specifications and recommendations on-site.
2. The permittee shall perform daily pressure drop checks on the control devices of this permit condition using Attachment D or an equivalent tracking method.
3. The permittee shall maintain an operating and maintenance log for the control devices using Attachment G or an equivalent tracking method, which will include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

PERMIT CONDITION 010		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations		
40 CFR Part 63 Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants		
for Source Category: Gasoline Dispensing Facilities		
Emission Source	Description	Control Device
EP-07	Gasoline Storage Tank, less than 1,000 gal	-

Management Practices:

1. The permittee must, at all times, operate and maintain the affected source, including any associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.11115(a)]
2. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)]
 - a) Minimize gasoline spills; [§63.11116(a)(1)]
 - b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(3)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11116(a)(4)]
3. The permittee is not required to submit notifications or reports, but the permittee shall have records available within 24 hours of a request by the Administrator to document the installation’s gasoline throughput. [§63.11116(b)]

4. The permittee shall, upon request by the Administrator, demonstrate that their average monthly throughput is less than 10,000 gallons³. [§63.11111(e)]

General Provisions:

The permittee shall comply with the applicable General Provisions in Table 3 to MACT CCCCCC. [§63.11130]

Recordkeeping:

1. The installation shall maintain records of the monthly gasoline throughput of EP-07 using Attachment H, or an equivalent tracking method.
2. The permittee shall maintain an operating and maintenance log for the tank using Attachment C or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log shall include the following: [§63.11125(d)]
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and [§63.11125(d)(1)]
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [§63.11125(d)(2)]

³ EP-07 may become subject to different limitations if the average monthly gasoline throughput is greater than 10,000 gallons.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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.

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 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 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**This is a State Only permit requirement.**

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.

10 CSR 10-6.280 Compliance Monitoring Usage

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

- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)
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- 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, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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 Jon D. Smith, President. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(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.

VI. Attachments

Attachments follow.

Attachment B1**100.0 tpy PM₁₀ Limitation Tracking Record**

This worksheet is for the emission points limited to 100.0 tpy PM₁₀ as listed in Permit Condition PW001.

This worksheet covers the month of _____.
(month, year)

Emission Source	Description	Monthly Throughput	PM ₁₀ Emission Factor	Emission Factor Source ⁴	Control Efficiency	Monthly PM ₁₀ Emissions ⁵
EP-01	Log Sawing - Rip Saws	tons	0.2 lb/ton	SCC 30700802	99%	
	Log Sawing - Rough knot Saws	tons	0.2 lb/ton	SCC 30700802	99%	
	Log Sawing - Planers	tons	0.2 lb/ton	SCC 30700802	99%	
	Log Sawing - Finish Saws	tons	0.2 lb/ton	SCC 30700802	99%	
	Log Sawing - End Matchers	tons	0.2 lb/ton	SCC 30700802	99%	
	Log Sawing - Grinder	tons	0.2 lb/ton	SCC 30700802	99%	
EP-02	Log Sawing - Planer	tons	0.2 lb/ton	SCC 30700802	99%	
	Log Sawing-Finish Saws (2)	tons	0.2 lb/ton	SCC 30700802	99%	
EP-03	Wood-fired Steam Boiler	MMBtu	0.377 lb/MMBtu	SCC 10200908	50%	
EP-04	Sawdust Storage / Loadout Silo	tons	2.0 lb/ton	SCC 30703002	40%	
EP-10	Sawmill Process – Sawdust Loadout Blower, Truck Blower	tons	0.36 lb/ton	SCC 30700803	40%	
EP-12	Sawmill Process – Sawdust Loadout Blower, Truck Blower	tons	0.36 lb/ton	SCC 30700803	40%	
EP-13	Sawmill Process – Sawmill bin	tons	0.58 lb/ton	SCC 30703001	80%	
EP-15	Sawdust Storage / Loadout-Silo	tons	0.58 lb/ton	SCC 30703001	80%	
EP-16	Log Sawing-Grinder (Wood Chip Waste)	tons	0.2 lb/ton	SCC 30700802	99%	
EP-17	Log Sawing - Pre Surfacers	tons	0.2 lb/ton	SCC 30700802	99%	

⁴ Some revoked emission factors were used because no replacement emission factor exists to replace them.

⁵ Monthly PM₁₀ Emissions = [Monthly Throughput] × [PM₁₀ Emission Factor] × (1 - ([Control Efficiency] / 100)) / 2000

Emission Source	Description	Monthly Throughput	PM ₁₀ Emission Factor	Emission Factor Source ⁴	Control Efficiency	Monthly PM ₁₀ Emissions ⁵
EP-18, EP-19	Equipment subject to Permit Condition 003	-	-	-	-	Sum of Monthly PM ₁₀ Emissions from Attachment B2
Installation Monthly Start-Up, Shutdown, and Malfunction (SSM) PM₁₀ Emissions⁶ (tons):						
Installation Monthly PM₁₀ Emissions (tons):						
12-Month Rolling Total PM₁₀ Emissions (tons):						

If the 12-Month Rolling Total PM₁₀ Emissions are less than 100.0 tons, the facility is in compliance.

⁶ As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

Attachment B2
 15.0 tpy PM₁₀ Limitation Tracking Record

This sheet covers the period from _____ to _____.
 (month, year) (month, year)

This worksheet is for the emission points limited to 15.0 tpy PM₁₀ as listed in Permit Condition 003.

Emission Source	Description	Monthly Throughput	PM ₁₀ Emission Factor	Emission Factor Source ⁷ (SCC)	Overall Control Efficiency	Monthly PM ₁₀ Emissions ⁸
EP-18	Drag Conveyor #1		0.034 lb/ton	30200530	99%	
	Drag Conveyor #2		0.034 lb/ton	30200530		
	Pellet Elevator		0.034 lb/ton	30200530		
	Silo Discharge Conveyor		0.034 lb/ton	30200530		
	Elevator & Leg		0.034 lb/ton	30200530		
	Drag Conveyor #3		0.034 lb/ton	30200530		
	Drag Conveyor #4		0.034 lb/ton	30200530		
	Pellet Screener		0.038 lb/ton	30200537		
	Rotex Screener		0.038 lb/ton	30200537		
	Pellet Storage Silo		0.0063 lb/ton	30200540		
	Bagging Machine		0.029 lb/ton	30200560		
	Screw Conveyor		0.36 lb/ton	30700803		
	Screw Conveyor		0.36 lb/ton	30700803		
	Bucket Elevator		0.36 lb/ton	30700803		
	Hammermill		1.2 lb/ton	30200817		
	Heated Pellet Mill Pre Bin		0.0063 lb/ton	30200540		
EP-19	Screw Conveyor PM#1		0.36 lb/ton	30700803	50%	
	Screw Conveyor PM #2		0.36 lb/ton	30700803		
	Pellet Mill Pre Bin #1		0.0063 lb/ton	30200540		
	Pellet Mill Pre Bin #2		0.0063 lb/ton	30200540		
	Pellet Mill #1		0.15 lb/ton	30200818		
	Pellet Mill #2		0.15 lb/ton	30200818		
	Drag Conveyor		0.034 lb/ton	30200530		
Pellet Cooler		0.36 lb/ton	30200816			
Installation Monthly Start-Up, Shutdown, and Malfunction (SSM) PM₁₀ Emissions⁹ (tons):						
Installation Monthly PM₁₀ Emissions (tons):						
12-Month Rolling Total PM₁₀ Emissions (tons):						

The 12-Month Rolling Total PM₁₀ Emissions must always be less than 15.0 tons in order to be in compliance.

⁷ Some revoked emission factors were used because no replacement emission factor exists to replace them. WebFIRE provided controlled emission factors. The uncontrolled emission factor was back-calculated assuming a baghouse control efficiency of 99% and a cyclone control efficiency of 50%.

⁸ Monthly PM₁₀ Emissions = [Monthly Throughput] × [PM₁₀ Emission Factor] × (1 - ([Control Efficiency] / 100)) / 2000

⁹ As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

Attachment F

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

Readings ranged from _____ to _____ % opacity.

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

STATEMENT OF BASIS

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

Smith Flooring Inc.-Mountain View Facility manufactures hardwood floors. The processes include log debarking, kiln drying, sawing, planing, grinding, sawdust transfer and storage. The installation uses a 27 MMBtu/hr wood-fired boiler for indirect heating of processes and plant space heating. The installation has accepted a voluntary limitation of less than 100 tons per year of particulate matter less than or equal to ten microns in diameter (PM₁₀) to qualify for this Intermediate Operating Permit.

Updated Potential to Emit for the Installation

Pollutant	Uncontrolled Potential to Emit (tons/yr) ¹²
PM ₁₀	< 100
PM _{2.5}	< 100
CO	70.96
HAPs	2.71
NO _x	57.95
SO _x	2.96
VOC	2.03

¹²Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. PM₁₀ is limited based on the emission limitation in Permit Condition PW001. While there is no limit on PM_{2.5}, because PM_{2.5} is a smaller portion of PM₁₀, the installation will emit below 100 tons/year PM_{2.5} by complying with Permit Condition PW001.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	12.31	11.39	10.38	9.89	10.68
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	6.71	6.28	6.17	5.87	6.35
Sulfur Oxides (SO _x)	1.39	1.30	1.44	1.35	1.42
Nitrogen Oxides (NO _x)	27.15	25.56	28.29	26.46	27.92
Volatile Organic Compounds(VOC)	0.96	0.90	1.00	0.94	0.99
Carbon Monoxide (CO)	33.24	31.30	34.64	32.40	34.18
Hazardous Air Pollutants ¹³ (HAPs)	1.23	1.23	1.23	1.23	1.23
Acetaldehyde (75-07-0)	0.04	0.04	0.04	0.04	0.04
Acrolein (107-02-8)	0.20	0.20	0.20	0.20	0.20
Benzene (71-43-2)	0.21	0.21	0.21	0.21	0.21
Chlorine (7782-50-5)	0.04	0.04	0.04	0.04	0.04
Dichloromethane (75-09-2)	0.01	0.01	0.01	0.01	0.01
Formaldehyde (50-00-0)	0.22	0.22	0.22	0.22	0.22
Hydrogen Chloride (7647-01-0)	0.96	0.96	0.96	0.96	0.96
Manganese Compounds (20-12-2)	0.08	0.08	0.08	0.08	0.08
Styrene (100-42-5)	0.10	0.10	0.10	0.10	0.10
Toluene (108-88-3)	0.05	0.05	0.05	0.05	0.05

¹³ HAPs that emit less than 0.01 tons during the last five years not listed.

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 July 21, 2016;
2. 2016 Emissions Inventory Questionnaire, received March 3, 2017; and
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
4. Construction Permit 102014-014, issued October 24, 2014
5. Construction Permit 112001-002, issued November 1, 2001
6. Construction Permit 1197-014, and amendment dated May 6, 1998
7. Construction Permit 0596-021, issued May 14, 1996
8. Construction Permit 0893-014, issued October 5, 1993

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.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

The boiler is subject to this regulation because it is an indirect heating source. It has a new source emission limitation of 0.43 lb/MMBtu. However, the uncontrolled potential emissions from the boiler are 0.40 lb/MMBtu (based on the emission factor provided in AP-42 Section 1.6, Table 1.6-1 for dry wood burned in wood-fired boilers). Because the uncontrolled potential emissions are less than the limit, compliance is assured.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

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

This rule does not apply. The wood-fired boiler (EP-03) is exempt due being an indirect heating source per 6.400(1)(B)6. All units with federally enforceable control devices with efficiencies of at least 90% are exempt per 6.400(1)(B)15. Emission sources that emit under 0.5 lb/hr are exempt per 6.400 (1)(B)12. Emission sources that emit less than the process weight rule are exempt per 6.400(1)(B)16.

Emission Source	Description	MHDR	PM ₁₀ EF	EF Source (SCC)	PTE (lb/hr)	Limit (lb/hr)	Exempt?
EP-04	Sawdust Storage/Loadout Silo	1 tons/hr	1.20	30703002	1.20	4.1	Yes, < limit
EP-08	Sawmill Process – Sawmill Saws (Scrag Saw)	15 tons/hr	0.20	30700802	3.00	25.16	Yes, < limit
EP-09	Log Sawing - Grinder	1 ton/hr	0.20	30700802	0.20	-	Yes, < 0.5 lb/hr
EP-10	Sawmill Process – Sawdust Loadout Blower, truck blower	1 ton/hr	0.36	30700803	0.36	-	Yes, < 0.5 lb/hr
EP-11	Log Sawing - Grinder	1 ton/hr	0.20	30700802	0.20	-	Yes, < 0.5 lb/hr
EP-12	Sawmill Process – Sawdust Loadout Blower, truck blower	1 ton/hr	0.36	30700803	0.36	-	Yes, < 0.5 lb/hr
EP-14	Log Debarking	15 tons/yr	0.011	30700801	0.17	-	Yes, < 0.5 lb/hr

Thus, no emission point at this facility that emits particulate matter is currently subject to 10 CSR 10-6.400.

Construction Permit History

The installation was constructed prior to 1980, so much of the equipment is grandfathered from the construction permit rule.

Construction Permit 0893-014, issued October 5, 1993

This permit authorizes the installation of the wood fired boiler. It does not contain any special conditions.

Construction Permit 0596-021, issued May 14, 1996

This permit authorizes the addition of four saws, a planer and associated control equipment. This permit does contain 3 Special Conditions requiring the use of the control device and emission testing conditions. It should be noted that baghouse CD-05 was never installed; instead the new emission sources were routed to existing baghouse CD-02. Later additions to the facility resulted in the name of CD-05 being taken by a partial enclosure. Because CD-02 has adopted the non-existing CD-05's emission sources, CD-05's special conditions are assumed to apply to CD-02.

- Special Condition 1 requires CD-02 to have a control efficiency of at least 90%. This condition is unnecessary and has not been added in order to streamline this operating permit; CD-02 already satisfies this requirement and should continue to while complying with the permit conditions that require its upkeep.
- Special Condition 2 requires CD-02 to be in operation at all times the saws and planer are in operation. This condition has been incorporated into the operating permit.
- Special Condition 3 requires the permittee to inform the Air Pollution Control Program (APCP) within 30 days in advance of any emission testing. This condition is unnecessary and has not been added to the operating permit. The permittee must already seek approval from the APCP for any upcoming emission testing if the permittee wishes to incorporate an emissions test report into an air permit.

Construction Permit 1197-014, issued November 17, 1997 and amendment dated May 6, 1998

This permit authorizes the installation of a Scrag Mill consisting of a Scrag Saw, Blo-Hog Grinder, and Blower to produce sawdust from scrap wood and pneumatically convey it to a

truck loadout. This permit originally contained one special condition requiring the operation of the control device (baghouse), however the 1998 amendment removes that requirement because the potential emissions were less than 2 tons per year.

Construction Permit 112001-002, issued November 1, 2001

This project authorizes the installation of a grinder and a pre-surfacer.

- Special Condition 1 requires use of a baghouse on the grinder and pre-surfacer, and also requires pressure drop and maintenance monitoring and recordkeeping. It has been incorporated into this operating permit.
- Special Condition 2 limits the waste grinder from processing waste from off-site. It has been incorporated into this operating permit.

Construction Permit 102014-014, issued October 24, 2014

This permit adds a new wood pellet operation to the existing facility. This addition will convert waste sawdust into pellets. New baghouses and a dry cyclone will collect the PM₁₀ emissions. It should be noted that this construction permit grouped several new emission sources under the existing EP-01 due to a misunderstanding of where the emissions were being routed to. The new emission points under EP-01 were not routed to CD-01 or CD-02; they were routed to the new baghouse (CD-08) under EP-18. As a result, the installation groups the new sources listed in EP-01 of this construction permit under EP-18 instead in regards to the Emissions Inventory Questionnaire (EIQ) and this has been reflected in this operating permit.

- Special Condition 1 limits EP-18 and EP-19 to de minimis levels of PM₁₀. It has been incorporated into this operating permit.
- Special Condition 2 requires use of baghouses on EP-18 and includes associated monitoring and recordkeeping requirements. It has been incorporated into this operating permit.
- Special Condition 3 requires use of a cyclone on EP-19 and includes associated monitoring and recordkeeping requirements. It has been incorporated into this operating permit.
- Special Condition 4 has general recordkeeping and reporting requirements. It has been incorporated into this operating permit. See the general requirements listed in Section II. Plant Wide Emission Limitations.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart Kb – *Standards of Performance for Volatile Organic Liquid Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This rule applies to storage vessels with a capacity greater than or equal to 75 m³ used to store volatile organic liquids. The storage vessels at this facility are smaller than 75 m³.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart JJJJJJ- *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

The boiler meets the definition of existing biomass boiler in this regulation. It is subject to the requirements to obtain a tune up. There are no emission limitations (except the general requirement in §63.11205(a) to simply operate and maintain any affected source in a manner consistent with good air pollution control practices for minimizing emissions).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Greenhouse Gas Emissions

The installation is assumed to be a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

This rule applies. Permit Condition 006 does not require monitoring/recordkeeping requirements because the emission sources of that permit condition emit low levels of particulate matter (< 0.5 lb/hr) while controlled. As a result, no visible emissions are expected from the emission sources of that condition. Permit Condition 005 requires monitoring/recordkeeping because the emission sources of the permit condition emit larger amounts (> 0.5 lb/hr) of particulate matter and do not have a control device.

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

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions

The boiler is subject to these regulations, with an emission limit of 8.0 lbs/MMBtu. The potential emissions of the boiler are assumed to be 0.025 lb SO₂/MMBtu (based on the emission factor provided in AP-42 Section 1.6, Table 1.6-2 for wood-fired boilers). These potential emissions are less than that of the rule, thus compliance with this condition is assured under normal operating conditions. 10 CSR 10-6.260 was rescinded from the Missouri Code of State Regulations on November 30, 2015 but is still in the EPA-approved SIP and is thus still an applicable requirement. Once 10 CSR 10-6.261 is incorporated into the SIP it will become a federal requirement and 10 CSR 10-6.260 will be removed.

10 CSR 10-6.405, Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating

This rule applies to the boiler. The uncontrolled potential emissions from the boiler are 0.40 lb/MMBtu (based on the emission factor provided in AP-42 Section 1.6, Table 1.6-1 for dry wood burned in wood-fired boilers). Because the uncontrolled potential emissions are less than the limit, compliance is assured.

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

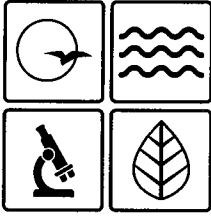
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

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

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

Response to Public Comments

A draft of this operating permit was put up on public notice on November 3, 2017 for a period of 30 days. During this period no public comments were received.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

DEC 08 2017

Mr. Jon D. Smith
Smith Flooring, Inc. - Mountain View Facility
P.O. Box 90
Mountain View, MO 65548

Re: Smith Flooring, Inc. - Mountain View Facility, 091-0005
Permit Number: OP2017-090

Dear Mr. Smith:

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

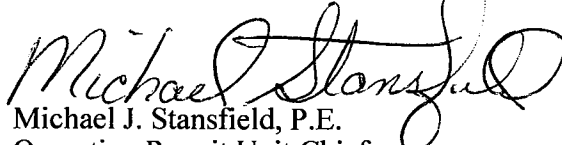
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS:kwj

Enclosures

c: PAMS File: 2016-07-041

