STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

NOV 0 5 2015

Mr. Erick Roberts
City of Springfield Sanitary Landfill
840 N. Boonville Ave
Springfield, MO 65801

Re: City of Springfield Sanitary Landfill, 077-0161
Permit Number: OP2015-050

Dear Mr. Roberts:

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:te

Enclosures

c: PAMS File: 2011-01-060

Missouri Department of Natural Resources
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2015-050
Expiration Date: NOV 0 5 2020
Installation ID: 077-0161
Project Number: 2011-01-060

Installation Name and Address
City of Springfield Sanitary Landfill
3545 W. Farm Road 34
Willard, MO 65781
Greene County
S21, 27, 28, & 29, T31N, R22W

Parent Company's Name and Address
City of Springfield
840 N. Boonville PO Box 8368
Springfield MO, 65801

Installation Description:

The City of Springfield Sanitary Landfill operates a municipal solid waste landfill in Greene County Missouri. The installation began accepting municipal solid waste in 1975 and has a current design capacity of 8.83 million Megagrams. Because the design capacity of the landfill is in excess of 2.5 million megagrams, the facility is subject to 40 CFR 60 Subpart WWW – Standards of performance for Municipal Solid Waste Landfills. The applicability of Subpart WWW requires the installation to obtain a Part 70 Operating Permit. The installation is major for carbon monoxide (CO).

Prepared by
Tandi Edelman
Operating Permit Unit

Director or Designee
Department of Natural Resources

NOV 0 5 2015
Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION
The City of Springfield Sanitary Landfill operates a municipal solid waste landfill in Greene County Missouri. The installation began accepting municipal solid waste (MSW) in 1975 and has a current design capacity of 8.83 million Megagrams (Mg). The installation is major for carbon monoxide (CO).

The typical operation of the landfill is to place MSW hauled usually by small dump truck, packer/roll off trucks, tractor-trailers and pickup trucks in an active area and compact with heavy equipment to reduce the volume of the waste. The compacted waste is then covered on a routine basis with soil obtained from onsite. Decomposing waste encapsulated within the landfill produces landfill gas that is primarily composed of methane and carbon dioxide with trace amounts of non-methane organic compounds (NMOC), some of which are classified as hazardous air pollutants (HAPs). Particulate matter (PM) emissions also occur while the landfill is in operation due to vehicular travel on paved and unpaved roads on installation property, as well as from wind erosion on storage piles and earth-moving activities onsite.

Tier 2 testing conducted at the installation in 2011 concluded that the NMOC emissions were 15.5 Mg per year and are below the 50 Mg per year threshold for gas collection and control under New Source Performance Standards (NSPS) Subpart WWW – therefore a gas collection and control system (GCCS) is not currently required at the facility. Tier 2 testing is required to be conducted in 2016.

A gas collection system was initially installed at the installation to control subsurface landfill gas migration and odor. The collection and control system consists of approximately eighty (80) gas extraction wells installed throughout the landfill area and one (1) active candlestick flare. Following installation of the gas collection system, a gas-to-energy facility consisting of gas treatment equipment, and two landfill gas fired electric generating units were installed to the south of the facility as Noble Hill Landfill Renewable Energy Center (077-0170). The gas-to-energy facility is owned and operated by the City Utilities of Springfield under Part 70 Operating Permit No. OP2010-073A and is co-located with the landfill. The landfill and gas-to-energy facilities are considered one installation for potential to emit and modeling purposes but operate under separate installation identifications and permits.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM_{10})	15.57	20.17	25.00	35.33	25.28
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)	1.92	1.78	1.46	2.15	1.80
Sulfur Oxides (SO_x)	0.21	0.00	3.29	1.69	1.69
Nitrogen Oxides (NO_x)	0.60	0.05	9.40	4.84	4.84
Volatile Organic Compounds(VOC)	6.73	4.71	2.32	2.42	2.41
Carbon Monoxide (CO)	11.34	0.01	176.31	90.79	90.79
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	0.96	0.59	0.46	0.31	0.31
Ammonia (NH_3)	0.00	0.00	0.00	0.00	0.00

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. These emission sources are also subject to the plantwide emission limitations.

2013 EIQ Reference	Description	Applicable Requirements
EU01	Sanitary Landfill Fugitive Emissions	NSPS WWW
EU02	Haul Road to the Landfill – Small Dump Truck	112002-010
EU03	Haul Road to the Landfill – Packer/Rolloff	112002-010
EU04	Haul Road for the Borrowed Area – CAT 627	112002-010
EU07	500 Gallon Unleaded Gasoline Fuel Storage Tank	MACT CCCCCC
EU08	Haul Road Alternate – Volvo Dump Truck	112002-010
EU12	Haul Road to Landfill – Tractor Trailer	112002-010
EU13	Haul Road to Landfill – Pickup Truck	112002-010
EU15	Landfill Gas Flare	10 CSR 10-6.260, 10 CSR 10-2.220
EU16	60 kW Backup Generator At Scalehouse	MACT ZZZZ
EU16	100kW Backup Generator (2008)	MACT IIII
EU16	100kW Backup Generator At Leachate Pond (2008)	MACT IIII

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. These emission sources are subject to the plantwide emission limitations.

2013 EIQ Reference	Description
EU05	10,000 Gallon Diesel Fuel Storage Tank
EU06	500 Gallon Diesel Fuel Storage Tank
EU09	Overburden (Screened) Storage Pile
EU10	Overburden (Cover Soil) Storage Pile
EU17	Leachate Pond
EU18	Solvent Parts Washer
EU19	500 Gallon Waste Oil Tank

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

Construction Permit No. 112002 -010

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 installation wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

Plant Wide Condition 1

10 CSR 10-6.060 Construction Permits Required
Permit No. 112002-010, issued on November 8, 2002

This requirement is not federally enforceable and is a state only requirement.

Emission Limitation:

If a continuing situation of demonstrated nuisance odors exist in violation of 10 CSR 10-6.165, Restriction of Emission of Odors, the Director may require the permittee to submit a corrective action plan within ten (10) days of the request (or alternative schedule if approved by the Director) that is adequate to timely and significantly mitigate the cause(s) of the odors. The permittee shall implement such plan immediately upon its approval by the Director. Failure to either submit such a corrective action plan, if requested, or to implement such a plan after approval by the Director shall be in violation of this permit. [Special Condition #5]

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

Permit Condition 1 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart A General Provisions 40 CFR Part 60, Subpart WWW Standards of Performance for Municipal Solid Waste Landfills	
2013 EIQ Reference	Description
EU01	Municipal Solid waste landfill constructed in 1975, modified in 2001 and 2002. Current capacity is 16,230,000 cubic yards (8.83 million Mg)

Emission Limitations:

1) The permittee shall either comply with Paragraph (b)(2) of §60.752 or calculate an NMOC emission rate for the landfill using the procedures specified in §60.754. The NMOC emission rate shall be recalculated annually, except as provided in §60.757(b)(1)(ii). . [§60.752(b)]
   a) If the calculated NMOC emission rate is less than 50 megagrams per year, the permittee shall: [§60.752(b)(1)]
      i.) Submit an annual emission report to the Director, except as provided for in §60.757(b)(1)(ii); and [§60.752(b)(1)(i)]
      ii.) Recalculate the NMOC emission rate annually using the procedures specified in §60.754(a)(1) until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, or the landfill is closed. [§60.752(b)(1)(ii)]
         A. If the NMOC emission rate, upon recalculation required in Paragraph (b)(1)(ii) of §60.752, is equal to or greater than 50 megagrams per year, the permittee shall install a collection and control system in compliance with Paragraph (b)(2) of §60.752. [§60.752(b)(1)(ii)(A)]
         B. If the landfill is permanently closed, a closure notification shall be submitted to the Director as provided for in §60.757(d). [§60.752(b)(1)(ii)(B)]
2) When a MSW landfill subject to NSPS WWW is closed, the permittee is no longer subject to the requirement to maintain an operating permit under part 70 for the landfill if the landfill is not otherwise subject to the requirements of part 70 and if either of the following conditions are met: [§60.752(d)]
   a) The landfill was never subject to the requirement for a control system under Paragraph (b)(2) of §60.752; or [§60.752(d)(1)]
   b) The permittee meets the conditions for control system removal specified in Paragraph (b)(2)(v) of §60.752. [§60.752(d)(2)]
3) If the estimated NMOC emission rate as reported in the annual report to the Director is less than 50 Mg per year in each of the next five consecutive years, the permittee may elect to submit an estimate of the NMOC emission rate for the next five-year period in lieu of the annual report. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the five years for which an NMOC emission rate is estimated. All data and calculations

upon which this estimate is based shall be provided to the Director. This estimate shall be revised at least once every five years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the five-year estimate, a revised five-year estimate shall be submitted to the Director. The revised estimate shall cover the five-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate. [40 CFR 60.757(b)(l)(ii)]

4) If the annual calculated NMOC emission rate is equal to or greater than 50 Mg per year, the permittee shall:
   a) Comply with the requirements in §60.753 through 60.759 except as provided by §60.752(b)(2)(i)(B) (i.e. approved alternatives) [40 CFR 60.756] and
   b) Comply with the requirements of §63.1955(b) and 63.1960 through 63.1980 by the date the landfill is required to install a collection and control systems by 40 CFR 60.752(b)(2). [40 CFR 1945(e)]

Test methods and procedures:

1) The permittee shall calculate the NMOC emission rate using either the equation provided in Paragraph (a)(1)(i) of §60.754 or the equation provided in Paragraph (a)(1)(ii) of §60.754. Both equations may be used if the actual year-to-year solid waste acceptance rate is known, as specified in §60.754(a)(1)(i), for part of the life of the landfill and the actual year-to-year solid waste acceptance rate is unknown, as specified in §60.754(a)(1)(ii), for part of the life of the landfill. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for L_o, and 4,000 parts per million by volume as hexane for the C_{NMOC}. For landfills located in geographical areas with a 30 year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year. [§60.754(a)(1)]
   a) The following equation shall be used if the actual year-to-year solid waste acceptance rate is known. [§60.754(a)(1)(i)]

$$M_{NMOC} = \sum_{i=1}^{n} 2kL_oM_i(e^{-kt_i})(C_{NMOC})(3.6\ x\ 10^{-9})$$

   where,
   M_{NMOC}=Total NMOC emission rate from the landfill, megagrams per year
   k=methane generation rate constant, year^{-1}
   L_o=methane generation potential, cubic meters per megagram solid waste
   M_i=mass of solid waste in the ith section, megagrams
   t_i=age of the ith section, years
   C_{NMOC}=concentration of NMOC, parts per million by volume as hexane
   3.6×10^{-9}=conversion factor
   The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for M_i if documentation of the nature and amount of such wastes is maintained
   b) The following equation shall be used if the actual year-to-year solid waste acceptance rate is unknown. [§60.754(a)(1)(ii)]

$$M_{NMOC} = 2L_oR(e^{-kc} - e^{-kt})C_{NMOC}(3.6\ x\ 10^{-9})$$

   Where:
   M_{NMOC}=mass emission rate of NMOC, megagrams per year
   L_o=methane generation potential, cubic meters per megagram solid waste
   R=average annual acceptance rate, megagrams per year

k=methane generation rate constant, $year^{-1}$
t = age of landfill, years
C_{NMOC}=concentration of NMOC, parts per million by volume as hexane
c=time since closure, years; for active landfill c=O and e^{-kc}=1
3.6×10^{-9}=conversion factor
The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value of R, if documentation of the nature and amount of such wastes is maintained.

2) Tier 1. The permittee shall compare the calculated NMOC mass emission rate to the standard of 50 megagrams per year. [§60.754(a)(2)]
   a) If the NMOC emission rate calculated in Paragraph (a)(1) of §60.754 is less than 50 megagrams per year, then the permittee shall submit an emission rate report as provided in §60.757(b)(1), and shall recalculate the NMOC mass emission rate annually as required under §60.752(b)(1). [§60.754(a)(2)(i)]
   b) If the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, then the permittee shall either comply with §60.752(b)(2), or determine a site-specific NMOC concentration and recalculate the NMOC emission rate using the procedures provided in Paragraph (a)(3) of §60.754. [§60.754(a)(2)(ii)]
3) Tier 2. The permittee shall determine the NMOC concentration using the following sampling procedure. The permittee shall install at least two sample probes per hectare of landfill surface that has retained waste for at least two years. If the landfill is larger than 25 hectares in area, only 50 samples are required. The sample probes should be located to avoid known areas of non-degradable solid waste. The permittee shall collect and analyze one sample of landfill gas from each probe to determine the NMOC concentration using Method 25 or 25C of NSPS Appendix A. Method 18 of NSPS Appendix A may be used to analyze the samples collected by the Method 25 or 25C sampling procedure. Taking composite samples from different probes into a single cylinder is allowed; however, equal sample volumes must be taken from each probe. For each composite, the sampling rate, collection times, beginning and ending cylinder vacuums, or alternative volume measurements must be recorded to verify that composite volumes are equal. Composite sample volumes should not be less than one liter unless evidence can be provided to substantiate the accuracy of smaller volumes. Terminate compositing before the cylinder approaches ambient pressure where measurement accuracy diminishes. If using Method 18, the permittee shall identify all compounds in the sample and, as a minimum, test for those compounds published in the most recent Compilation of Air Pollutant Emission Factors (AP–42), minus carbon monoxide, hydrogen sulfide, and mercury. As a minimum, the instrument must be calibrated for each of the compounds on the list. Convert the concentration of each Method 18 compound to C_{NMOC} as hexane by multiplying by the ratio of its carbon atoms divided by six. If more than the required number of samples are taken, all samples must be used in the analysis. The permittee shall divide the NMOC concentration from Method 25 or 25C of NSPS Appendix A by six to convert from C_{NMOC} as carbon to C_{NMOC} as hexane. If the landfill has an active or passive gas removal system in place, Method 25 or 25C samples may be collected from these systems instead of surface probes provided the removal system can be shown to provide sampling as representative as the two sampling probe per hectare requirement. For active collection systems, samples may be collected from the common header pipe before the gas moving or condensate removal equipment. For these systems, a minimum of three samples must be collected from the header pipe. [§60.754(a)(3)]

a) The permittee shall recalculate the NMOC mass emission rate using the equations provided in §60.754(a)(1)(i) or (a)(1)(ii) and using the average NMOC concentration from the collected samples instead of the default value in the equation provided in §60.754(a)(1). [§60.754(a)(3)(i)]
b) If the resulting mass emission rate calculated using the site-specific NMOC concentration is equal to or greater than 50 megagrams per year, then the permittee shall either comply with §60.752(b)(2), or determine the site-specific methane generation rate constant and recalculate the NMOC emission rate using the site-specific methane generation rate using the procedure specified in §60.754(a)(4). [§60.754(a)(3)(ii)]
c) If the resulting NMOC mass emission rate is less than 50 megagrams per year, the permittee shall submit a periodic estimate of the emission rate report as provided in §60.757(b)(1) and retest the site-specific NMOC concentration every five years using the methods specified in §60.754. [§60.754(a)(3)(iii)]

4) Tier 3. The site-specific methane generation rate constant shall be determined using the procedures provided in Method 2E of NSPS Appendix A. The permittee shall estimate the NMOC mass emission rate using equations in §60.754(a)(1)(i) or (a)(1)(ii) and using a site-specific methane generation rate constant k, and the site-specific NMOC concentration as determined in §60.754(a)(3) instead of the default values provided in §60.754(a)(1). The permittee shall compare the resulting NMOC mass emission rate to the standard of 50 megagrams per year. [§60.754(a)(4)]
   a) If the NMOC mass emission rate as calculated using the site-specific methane generation rate and concentration of NMOC is equal to or greater than 50 megagrams per year, the permittee shall comply with §60.752(b)(2). [§60.754(a)(4)(i)]
   b) If the NMOC mass emission rate is less than 50 megagrams per year, then the permittee shall submit a periodic emission rate report as provided in §60.757(b)(1) and shall recalculate the NMOC mass emission rate annually, as provided in §60.757(b)(1) using the equations in §60.754(a)(1) and using the site-specific methane generation rate constant and NMOC concentration obtained in§60.754(a)(3). The calculation of the methane generation rate constant is performed only once, and the value obtained from this test shall be used in all subsequent annual NMOC emission rate calculations. [§60.754(a)(4)(ii)]
5) The permittee may use other methods to determine the NMOC concentration or a site-specific k as an alternative to the methods required in Paragraphs (a)(3) and (a)(4) of §60.754 if the method has been approved by the Director. [§60.754(a)(5)]
6) When calculating emissions for PSD purposes, the permittee shall estimate the NMOC emission rate for comparison to the PSD major source and significance levels in §§51.166 or 52.21 of this chapter using AP–42 or other approved measurement procedures. [§60.754I]

Reporting requirements:

1) The permittee shall submit an NMOC emission rate report to the Director initially and annually thereafter, except as provided for in Paragraphs (b)(1)(ii) or (b)(3) of §60.757. The Director may request such additional information as may be necessary to verify the reported NMOC emission rate. [§60.757(b)]
   a) The NMOC emission rate report shall contain an annual or five-year estimate of the NMOC emission rate calculated using the formula and procedures provided in §60.754(a) or (b), as applicable. [§60.757(b)(1)]
      i.) The initial NMOC emission rate report may be combined with the initial design capacity report required in §60.757(a) and shall be submitted no later than indicated in Paragraphs (b)(1)(i)(A) and (B) of §60.757. Subsequent NMOC emission rate reports shall be

submitted annually thereafter, except as provided for in Paragraphs (b)(1)(ii) and (b)(3) of §60.757. [§60.757(b)(1)(i)]

A. June 10, 1996, for landfills that commenced construction, modification, or reconstruction on or after May 30, 1991, but before March 12, 1996, or [§60.757(b)(1)(i)(A)]
B. 90 days after the date of commenced construction, modification, or reconstruction for landfills that commence construction, modification, or reconstruction on or after March 12, 1996. [§60.757(b)(1)(i)(B)]

ii.) If the estimated NMOC emission rate as reported in the annual report to the Director is less than 50 megagrams per year in each of the next five consecutive years, the permittee may elect to submit an estimate of the NMOC emission rate for the next five-year period in lieu of the annual report. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the five years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to the Director. This estimate shall be revised at least once every five years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the five-year estimate, a revised five-year estimate shall be submitted to the Director. The revised estimate shall cover the five-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate. [§60.757(b)(1)(ii)]

b) The NMOC emission rate report shall include all the data, calculations, sample reports and measurements used to estimate the annual or five-year emissions. [§60.757(b)(2)]
c) The permittee is exempted from the requirements of Paragraphs (b)(1) and (2) of §60.757, after the installation of a collection and control system in compliance with §60.752(b)(2), during such time as the collection and control system is in operation and in compliance with §§60.753 and 60.755. [§60.757(b)(3)]

Recordkeeping requirements:

1) The permittee shall keep for at least five years up-to-date, readily accessible, on-site records of the design capacity report which triggered §60.752(b), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within four hours. Either paper copy or electronic formats are acceptable. [§60.758(a)]
2) The permittee shall keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector. [§60.758(d)]
   a) The permittee shall keep up-to-date, readily accessible records of the installation date and location of all newly installed collectors as specified under §60.755(b). [§60.758(d)(1)]
   b) The permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in §60.759(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in §60.759(a)(3)(ii). [§60.758(d)(2)]
3) Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition 2 10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos Standard for active waste disposal sites §61.154.	
2013 EIQ Reference	Description
EU01	Municipal Solid waste landfill constructed in 1975, modified in 2001 and 2002. Current capacity is 16,230,000 cubic yards (8.83 million Mg)

Emission/Operational Limitations:

Each owner or operator of an active waste disposal site that receives asbestos-containing waste material from a source covered under §61.149, 61.150, or 61.155 shall meet the requirements of this section: [§61.154]

1) Either there must be no visible emissions to the outside air from any active waste disposal site where asbestos-containing waste material has been deposited, or the requirements of §61.154(c) or (d) must be met. [§61.154(a)]
2) Unless a natural barrier adequately deters access by the general public, either warning signs and fencing must be installed and maintained as follows, or the requirements of §61.154(c)(1) must be met. [§61.154(b)]
   a.) Warning signs must be displayed at all entrances and at intervals of 100 m (330 ft) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material is deposited. The warning signs must: [§61.154(b)(1)]
      i.) Be posted in such a manner and location that a person can easily read the legend; and [§61.154(b)(1)(i)]
      ii.) Conform to the requirements of 51 cm × 36 cm (20 inch;×14 inch;) upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and [§61.154(b)(1)(ii)]
      iii.) Display the following legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in this paragraph.

Legend	Notation
Asbestos Waste Disposal Site……..	2.5 cm (1 inch) Sans Serif, Gothic or Block.
Do Not Create Dust……..	1.9 cm (3/4 inch) Sans Serif, Gothic or Block
Breathing Asbestos is Hazardous to Your Health	14 Point Gothic.

Spacing between any two lines must be at least equal to the height of the upper of the two lines. [§61.154(b)(1)(iii)]

The perimeter of the disposal site must be fenced in a manner adequate to deter access by the general public. [§61.154(b)(2)]

   b.) Upon request and supply of appropriate information, the Director will determine whether a fence or a natural barrier adequately deters access by the general public. [§61.154(b)(3)]
3) Rather than meet the no visible emission requirement of §61.154(a), at the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing waste material that has been deposited at the site during the operating day or previous 24-hour period shall: [§61.154(c)]

a.) Be covered with at least 15 centimeters (6 inches) of compacted nonasbestos-containing material, or [§61.154(c)(1)]
b.) Be covered with a resinous or petroleum-based dust suppression agent that effectively binds dust and controls wind erosion. Such an agent shall be used in the manner and frequency recommended for the particular dust by the dust suppression agent manufacturer to achieve and maintain dust control. Other equally effective dust suppression agents may be used upon prior approval by the Director. For purposes of this paragraph, any used, spent, or other waste oil is not considered a dust suppression agent. [§61.154(c)(2)]

4) Rather than meet the no visible emission requirement of §61.154(a), use an alternative emissions control method that has received prior written approval by the Director according to the procedures described in §61.154(c)(2). [§61.154(d)]
5) Upon closure, comply with all the provisions of §61.151. [§61.154(g)]

Recordkeeping:

1) For all asbestos-containing waste material received, the owner or operator of the active waste disposal site shall: [§61.154(e)]
   a) Maintain waste shipment records, using a form similar to that shown in Figure 4 of 40 CFR 61, Subpart M (see Attachment D) , and include the following information: [§61.154(e)(1)]
      i) The name, address, and telephone number of the waste generator. [§61.154(e)(1)(i)]
      ii) The name, address, and telephone number of the transporter(s). [§61.154(e)(1)(ii)]
      iii) The quantity of the asbestos-containing waste material in cubic meters (cubic yards). [§61.154(e)(1)(iii)]
      iv) The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers. Report in writing to the local, State, or Environmental Protection Agency's (EPA) Regional Office responsible for administering the asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) program for the waste generator (identified in the waste shipment record), and, if different, the local, State, or EPA Regional Office responsible for administering the asbestos NESHAP program for the disposal site, by the following working day, the presence of a significant amount of improperly enclosed or uncovered waste. Submit a copy of the waste shipment record along with the report. [§61.154(e)(1)(iv)]
      v) The date of the receipt. [§61.154(e)(1)(v)]
   b) Retain a copy of all records and reports required by §61.154(e) for at least two years. [§61.154(e)(4)
2) Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area. [§61.154(f)]

Reporting:

1) For all asbestos-containing waste material received, the owner or operator of the active waste disposal site shall send a copy of the signed waste shipment record to the waste generator as soon as possible and no longer than 30 days after receipt of the waste. [§61.154(e)(2)]
2) Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity actually received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if

different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report. [§61.154(e)(3)]

3) Submit to the Director, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities. [§61.154(h)]
4) Furnish upon request, and make available during normal business hours for inspection by the Director, all records required under this section. [§61.154(i)]
5) Notify the Director in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the Director at least ten working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice: [§61.154(j)]
   a) Scheduled starting and completion dates. [§61.154(j)(1)]
   b) Reason for disturbing the waste. [§61.154(j)(2)]
   c) Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the Director may require changes in the emission control procedures to be used. [§61.154(j)(3)]
   d) Location of any temporary storage site and the final disposal site. [§61.154(j)(4)]

Permit Condition 3 **Landfill Gas Flare** 10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminates	
2013 EIQ Reference	Description
EU15	Candlestick Gas Flare, Perennial Energy, 2,000 SCFM, model 1498 installed May 2006.

Emission Limitation:

1) The permittee shall not cause or permit to be discharged into the atmosphere from EU15 any visible emissions with an opacity greater than 20%.
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%.

Monitoring/Record Keeping:

1) The permittee shall conduct opacity readings on EU15 using Test Method 22 like procedures. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For an emission unit with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2) The permittee must maintain the following monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance during the weeks the flare operates.
   b) Should the permittee observe no violations of this regulation during this period then the permittee shall conduct monthly observations only during the months which the flare operates.

(1) 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:

The permittee shall maintain records of all observation results using Attachment C (or its equivalent), noting:

1) Whether any air emissions (except for water vapor) were visible from the emission units;
2) All emission units from which visible emissions occurred;
3) Whether the visible emissions were normal for the process;
4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition 4 **Landfill Gas Flare** 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	
2013 EIQ Reference	Description
EU15	Candlestick Gas Flare, Perennial Energy, 2,000 SCFM, model 1498 installed May 2006.

Emission Limitation:

The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m3 of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour period.

Fuel Monitoring/Recordkeeping:

None, see Statement of Basis.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition 5 **Haul Road Areas** 10 CSR 10-6.060 Construction Permits Required Permit No. 112002-010, issued on November 14, 2002	
2013 EIQ Reference	Description
EU02	Haul Road for Landfill, Small Dump Truck
EU03	Haul Road for Landfill, Packer/Roller
EU04	Haul Road for Borrow Area, Scraper
EU08	Haul Road for Borrow Area, Articulated Dump Truck
EU12	Haul Road for Landfill, Tractor Trailer
EU13	Haul Road for Landfill, Pickup Truck

Emission Limitation:

1) The permittee shall water to maintain 50% control efficiency on the unpaved section of the waste haul road (400 feet), the borrow haul road and the storage pile vehicular traffic areas whenever conditions exist which would cause visible emissions to enter the ambient air beyond the property boundary. [Special Condition No. 3]
2) The permittee shall control dust from 3,600 feet of the waste haul road by paving the road with asphalt, concrete or with other paving materials, if requested by the permittee and approved by the Air Pollution Control Program. [Special Condition No. 4A]
3) The permittee shall periodically either water, wash or use an alternative equivalent method to clean the paved portion of the waste haul road such that "no appreciable visible emission" of particulate matter is allowed to occur from the surfaces of these paved road(s). [Special Condition No. 4B]

Monitoring/Recordkeeping/Reporting:

No Monitoring or recordkeeping required as long as the watering is applied according to Best Management Practices as in Attachment A.

<table>
<tr><th colspan="4">Permit Condition 6
60kW Backup Generator at Scalehouse
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</th></tr>
<tr><td>2013 EIQ Reference</td><td colspan="3">Description (Service Date)</td></tr>
<tr><td>EU16</td><td colspan="3">60 kW (20 Hp) Backup Generator At Scalehouse – Constructed February 2000</td></tr>
<tr><td>Engine Category</td><td>Existing Emergency CI < 500 Hp located at an Area Source</td><td>Monitoring, Installation, Collection, Operation and Maintenance Requirements</td><td>§63.6625(e), (f), (h), (i)</td></tr>
<tr><td>Date Constructed</td><td>Before 6/12/2006</td><td>Initial Compliance</td><td>No Requirements</td></tr>
<tr><td>Compliance Date</td><td>May 3, 2013</td><td>Continuous Compliance</td><td>§63.6605, §63.6640(f)</td></tr>
<tr><td>Work Practice Standards</td><td>§63.6603
Table 2d, Item #4</td><td>Notification Requirements</td><td>No Requirements
per §63.6645(a)(5)</td></tr>
<tr><td>Operating Limitations</td><td>§63.6640(f)</td><td>Recordkeeping Requirements</td><td>§63.6655(a), (d), (e) & (f)</td></tr>
<tr><td>Fuel Requirements</td><td>No Requirements</td><td>Reporting Requirements</td><td>§63.6640(b),
Footnote 2 of Table 2d</td></tr>
<tr><td>Performance Tests</td><td>No Requirements</td><td>General Provisions
(40 CFR part 63)</td><td>Yes, except per §63.6645(a)(5), the following do not apply: §63.7(b) and (c), §63.8(e), (f)(4) and (f)(6), and §63.9(b)-(e), (g) and (h).</td></tr>
<tr><td colspan="4">The full text of the requirements for these units under MACT ZZZZ are found in 40 CFR 63 under the citations presented in the table above.</td></tr>
</table>

Annual Usage Limitations to Maintain Emergency-Only Status:

1) The permittee must operate the emergency stationary reciprocating internal combustion engine (RICE) according to the requirements in paragraphs §63.6640(f)(1) through §63.6640(f)(4). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs §63.6640(f)(1) through §63.6640(f)(4), is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs §63.6640(f)(1) through §63.6640(f)(4), the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]
   a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
   b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) and §63.6640(f)(4) counts as part of the 100 hours per calendar year allowed by §63.6640(f)(2). [§63.6640(f)(2)]
      i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for

maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]

ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§63.6640(f)(2)(ii)]

iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of five percent or greater below standard voltage or frequency. [§63.6640(f)(2)(iii)]

c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(i) and §63.6640(f)(4)(ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(3)]

Recordkeeping Requirements;

The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.
2) The permittee shall report promptly any deviations from permit requirements, including those attributable to upsets, no later than 15 days after the end of the month to the Missouri Air Compliance Coordinator; EPA Region 7, 11201 Renner Boulevard, Lenexa, KS 66219. This report shall include the cause of such deviations and any corrective actions or preventive measures taken. Corrective actions may include a requirement for additional stack testing or more frequent monitoring, or could trigger implementation of a corrective action plan.
3) The permittee must report each instance in which an applicable emission limitation or operating limitation in Table 2d to MACT ZZZZ was not met. These instances are deviations from the emission and operating limitations in MACT ZZZZ, and must be reported according to the requirements in §63.6650. [§63.6640(b)]

Permit Condition 7 40 CFR 60 Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	
2013 EIQ Reference	Description
EU16	100kW (100 Hp) Backup Diesel Generator, installed 2008
EU16	100kW (100 Hp) Backup Diesel Generator At Leachate Pond, installed 2008

Operational Requirements/Limitations:

1) The permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, (Ultra Low Sulfur Diesel (ULSD) 15 ppm) [§60.4207(b)]
2) The engines must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g). [§60.4211(c)]
3) The Permittee must do all of the following, except as permitted under §60.4211(g):
   a.) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;
   b.) Change only those emission-related settings that are permitted by the manufacturer; and
   c.) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply. [§60.4211(a)(1) through (a)(3), and §60.4211(c)]
4) If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows: [§60.4211(g)]
   a.) The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards within one year of startup, or within one year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within one year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer. [§60.4211(g)(2)]
5) The permittee must operate the emergency stationary ICE according to the requirements in §60.4211(f)(1) through (3). In order for the engine to be considered an emergency stationary ICE under 40 CFR 60 Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4211(f)(1) through (3), is prohibited. If you do not operate the engine according to the requirements in §60.4211(f)(1) through (3), the engine will not be considered an emergency engine under NSPS IIII and must meet all requirements for non-emergency engines. [§60.4211(f)]
   a.) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
   b.) The permittee may operate the emergency stationary ICE for any combination of the purposes specified in §60.4211(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by this §60.4211(f)(2). [§60.4211(f)(2)]

i.) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4211(f)(2)(i)]

ii.) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§60.4211(f)(2)(ii)]

iii.) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of five percent or greater below standard voltage or frequency. [§60.4211(f)(2)(iii)]

c.) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §60.4211(f)(2). Except as provided in §60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4211(f)(3)]

i.) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§60.4211(f)(3)(i)(A) through (E)]

A.) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

B.) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

C.) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

D.) The power is provided only to the facility itself or to support the local transmission and distribution system.

E.) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition 8 **Backup Diesel Generators** 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	
2013 EIQ Reference	Description (Service Date)
EU16	60 kW (20Hp) Backup Generator At Scalehouse, installed February 2000
EU16	100kW (100 Hp) Backup Diesel Generator, installed after 2008
EU16	100kW (100 Hp) Backup Diesel Generator At Leachate Pond, installed 2008

Emission Limitation:

The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m3 of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour period.

Fuel Monitoring/Recordkeeping:

1) The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3) All records shall be maintained for five years.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition 9 **500 Gallon Unleaded Gasoline Fuel Storage Tank** 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart CCCCCC—National Emissions Standards for Hazardous Air Pollutants for	
2013 EIQ Reference	Description (Service Date)
EU07	500 Gallon Unleaded Gasoline Fuel Storage Tank

Emission Limitation:

1) The permittee must, at all times, 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. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which 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. (§60.11115(a))

2) The permittee must 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:
   a) Minimize gasoline spills;
   b) Clean up spills as expeditiously as practicable;
   c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
   d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. (§60.11116(a))
3) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of §60.11116. (§60.11116(d))

Monitoring/Record Keeping:

1) The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of 40 CFR 63, but you must have records available within 24 hours of a request by the Director to document your gasoline throughput. (§60.11116(b))
   a) The permittee must comply with the requirements of this subpart by the applicable dates specified in §63.11113. (§60.11116(c))

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

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

10 CSR 10-6.065 Operating Permits

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

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

1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos. Specifically 40 CFR 61.154 *Standard for Active waste disposal sites.*
2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100 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 Submission of Emission Data, Emission Fees and Process Information

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

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

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170
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 the visible emissions were normal for the installation.
3) Whether equipment malfunctions contributed to an exceedance.
4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

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

Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

V. General Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

None.

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

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

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

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

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

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

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

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

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

emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

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

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

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

10 CSR 10-6.020(2)(R)12 Responsible Official

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment A

Best Management Practices (BMPs)- Construction Industry Fugitive Emissions

Construction Industry Sites covered by the Interim Relief Policy shall maintain Best Management Control Practices (BMPs) for fugitive emission areas at their installations when in operation. Options for BMPs are at least one of the following:

For Haul Roads:

1. Pavement of Road Surfaces –
   - A. The operator(s) may pave all or any portion of the haul roads with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve "Control of Fugitive Emissions[1]" while the plant is operating.
   - B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
   - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Usage of Chemical Dust Suppressants –
   - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the unpaved portions of the haul roads. The suppressant will be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
   - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
   - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

3. Usage of Documented Watering –
   - A. The operator(s) shall control the fugitive emissions from all the unpaved portions of the haul roads at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads as necessary to achieve control of

[1] For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)

fugitive emissions from these areas while the plant is operating. For example, the operator(s) shall calculate the total square feet of unpaved vehicle activity area requiring control on any particular day, divide that product by 1,000, and multiply the quotient by 100 gallons for that day.

B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operation (e.g., meteorological situations, precipitation events, freezing, etc.)

C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.

D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.

E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

For Vehicle Activity Areas around Open Storage Piles:

1. Pavement of Stockpile Vehicle Activity Surfaces –

A. The operator(s) may pave all or any portion of the vehicle activity areas around the storage piles with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.

B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.

C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Usage of Chemical Dust Suppressants –

A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the vehicle activity areas around the open storage piles. The suppressant will be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas

while the plant is operating.

C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

3. Usage of Documented Watering –

A. The operator(s) shall control the fugitive emissions from all the vehicle activity areas around the storage piles at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating. (Refer to example for documented watering of haul roads.)

B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operations (e.g., meteorological situations, precipitation events, freezing, etc.)

C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.

D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.

E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

Attachment B
Fugitive Emission Observations

Date	Time	Visible Emissions					Abnormal Emissions		Initial
		Beyond Boundary		Less Than Normal	Normal	Greater Than Normal	Cause	Corrective Action	
		No	Yes						

Attachment C
Opacity Emission Observations

Date	Time	Visible Emissions				Abnormal Emissions		Initial
		Emission Source	Normal	Less Than	Greater Than	Cause	Corrective Action	

Attachment D
40 CFR Part 61, Subpart M – Waste Shipment Record

Generator	1. Work site name and mailing address	Owner's name	Owner's telephone no.
	2. Operator's name and address		Operator's telephone no.
	3. Waste disposal site (WDS) name, mailing address, and physical site location		WDS phone no.
	4. Name, and address of responsible agency		
	5. Description of materials	6. Containers No. Type	7. Total quantity m^3 (yd^3)
	8. Special handling instructions and additional information		
	9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.		
	Printed/typed name & title	Signature	Month Day Year
Transporter	10. Transporter 1 (Acknowledgment of receipt of materials)		
	Printed/typed name & title Address and telephone no.	Signature	Month Day Year
	11. Transporter 2 (Acknowledgment of receipt of materials)		
	Printed/typed name & title Address and telephone no.	Signature	Month Day Year
Disposal Site	12. Discrepancy indication space		
	13. Waste disposal site owner or operator: Certification of receipt of asbestos materials covered by this manifest except as noted in item 12.		
	Printed/typed name & title	Signature	Month Day Year

(Continued)

Figure 4. Waste Shipment Record

STATEMENT OF BASIS

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

1. Part 70 Operating Permit Application, received January 24, 2011;
2. 2012 Emissions Inventory Questionnaire, received April 19, 2012; and
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

40 CFR Part 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. (§63.6580).

Subpart ZZZZ is applicable to 60 kW backup generator at scalehouse and has been applied in Permit Condition 6.

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*
Subpart IIII is applicable to manufactures, owners, and operators of stationary compression ignition internal combustion engines.

Subpart IIII is applicable to 100kW backup generator at condensate tank and 100kW backup generator at leachate pond and has been applied in Permit Condition 7.

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

None

Air Regulation Requirements and Determinations

10 CSR 10-6.220, *Restriction of Emission of Air Contaminants*
The installation indicated this regulation does not apply in the application. However, since the flare is not required by 40 CFR Part 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills, then the unit does not meet the exemption in 6.220(1)(H), as it is not regulated by 40 CFR Part

60, including the flare requirements of §60.18. Since the exemption is not met, this regulation does apply and has been included in the permit.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
The flare burns landfill gas, which has a default sulfur concentration of 46.9 ppmv, which is much less than the limit for new sources, 500 ppmv. Since this unit is assumed to always be in compliance, no monitoring or recordkeeping is required.

The following calculations demonstrate compliance with 10 CSR 10-6.260 when burning fuel oil with a sulfur content less than 0.5%

$$\text{Distillate Oil } SO_2 \text{ emission factor } (\text{lbs/MMBtu}) = \frac{142(0.5)\ \text{lbs}/10^3\ \text{gal}}{140\ \text{MMBtu}/10^3\ \text{gal}} = 0.507\ \text{lb/MMBtu}$$

(AP - 42 Table 1.3 - 1(9/98))

$$\text{ppmv } SO_2 = \left(\frac{0.507\ \text{lb}}{\text{MMBtu}}\right) \times \left(\frac{\text{MMBtu}}{10{,}320\ \text{wscf}}\right) \times \left(\frac{\text{ppmw}}{1.660\text{E}^{-7}\ \text{lb/scf}}\right) \times \left(\frac{0.45\ \text{ppmv}}{\text{ppmw}}\right) = 133.22\ \text{ppmv}$$

(Appendix A – 7 to Part 60)

$$\text{Distillate Oil } SO_3 \text{ emission factor } (\text{lbs/MMBtu}) = \frac{2(0.5)\ \text{lbs}/10^3\ \text{gal}}{140\ \text{MMBtu}/10^3\ \text{gal}} = 0.007\ \text{lb/MMBtu}$$

(AP - 42 Table 1.3 - 1(9/98))

$$\text{ppmv } SO_3 = \left(\frac{0.007\ \text{lb}}{\text{MMBtu}}\right) \times \left(\frac{\text{MMBtu}}{10{,}320\ \text{wscf}}\right) \text{x} \left(\frac{1.602\ \text{x}\ 10^7\ \text{mg ft}^3}{\text{lb m}^3}\right) = 11.088\ \frac{\text{mg}}{\text{m}^3}$$

(Appendix A – 7 to Part 60)

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This regulation does not apply to the flare unit because this unit does not meet the definition of process weight.

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

Permit to Construct #112002-010
The special conditions of this permit are incorporated into the Operating Permit.
The following revisions were made to the applicable requirements listed in Permit to Construct 112002-010 for this installation:

Applicable requirements listed in the Permit to Construct #112002-010 should not include 10 CSR 10-6.400, *Restriction of Emissions Particulate Matter from Industrial Processes* as 10 CSR10-6.020 *Definitions and Common Reference Tables* defines process weight to exclude liquids and

gases used solely as fuels and air introduced for purposes of combustion. Since the landfill gas flare (EU15) is the emission source reviewed for applicability to this rule.

Special Condition No. 5 "Continuing Nuisance Odor Situation" refers to 10 CSR 10-4.170 *Restriction of Emission of Odors*. On November 30, 2010 10 CSR 10-4.170 *Restriction of Emission of Odors* was rescinded and replaced with 10 CSR 10-6.165 *Restriction of Emission of Odors.*

On July 16, 2013 MDNR received notice that the soil screen (including the conveyors, hoppers, and screen) and 20,000 gallon leachate/condensate tank have been removed from the facility.

Permit to Construct # 122001-007
Construction permit #122001-007 issued on November 7, 2001 permitted a 4.9 acre expansion to the landfill and installation of a gas collection system for the entire landfill. The conditions of this permit do not appear in the operating permit because this permit has been superceded and replaced by Permit to Construct #112002-010.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*
This subpart applies is each storage vessel with a capacity greater than or equal to 75 m^3 that is used to store volatile organic liquids (VOL) which construction, reconstruction, or modification is commenced after July 23, 1984.

There are three storage vessels at the installation including one (1) 10,000-gallon diesel fuel storage tank (EU05), one (1) 500-gallon diesel fuel storage tank (EU06), and one (1) 500-gallon gasoline fuel storage tank (EU07).

All of the storage tanks at this installations are less than the 75 cubic meters (m3) (19812.9 gallons) capacity threshold.

40 CFR Part 60, Subpart WWW, *Standards of Performance for Municipal Solid Waste Landfills.*
This subpart applies to each MSW landfill that commenced construction, reconstruction or modification on or after May 30, 1991 and has a maximum design capacity equal to or greater than 2.5 million Mg of MSW

The maximum design capacity of the landfill was increased in 2002 to 16,230,000 cubic yards (yd^3) [8.83 million Megagrams (Mg)] of MSW. Based upon actual operations the density of the waste in place is approximately 1,261 pounds per cubic yard in April 2014. Due to the year of modification and size of the landfill, the installation is subject to this provision.

Tier 2 testing was conducted at the installation in October 2001, November 2006, and May 2011. The tier 2 testing in May 2011 determined an emission of 15.5 megagrams/year. Tier 2 testing will occur at the installation during 2016.

A collection and control system was installed at the installation in 2002 for subsurface landfill gas migration and odor control only. The collection and control system consists of approximately eighty (80) gas extraction wells installed throughout the landfill and one (1) active candlestick flare. The current collection and control system in use at the installation is not currently required to meet the requirements of 40 CFR 60.752(b)(2), New Source Performance Standards (NSPS); however, 10 CSR 6.220 does apply until such time that NSPS would apply. 10 CSR 6.220 states that the rule does not apply to emission sources regulated by 40 CFR Part 60; and therefore would no longer apply upon exceedances of the 50 Mg per year of non-methane organic compounds (NMOC) emissions threshold.

40 CFR Part 60, Subpart IIII *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*
This subpart is applicable to manufactures, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005.
The 100kW Backup Diesel Generators were both installed after July 11, 2005 and are subject to this subpart and have been incorporated under Permit Condition 7. The requirements and limitations for units with less than 500 Hp was applied to the 100 kW generators because it does not exceed the 500 Hp category.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standard for Asbestos*
This subpart applies to Active waste disposal sites and is applied in Permit Condition 2.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning*
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
This MACT does not apply to EU18 Solvent Parts Washer because the permittee does not use any of the listed halogenated HAP solvents.

40 CFR Part 63, Subpart AAAA, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills.*
This subpart applies to each municipal solid waste landfill that commenced construction, reconstruction or modification on or after May 30, 1991
This MACT is not currently applicable to the landfill as the uncontrolled non-methane organic compounds (NMOC) emissions do not exceed 50 Mg/yr. This provision states that municipal solid waste landfills are subject to Subpart AAAA if the landfill has a design capacity equal to or greater than

2.5 million Mg or 2.5 million m^3 and has estimated uncontrolled emissions equal to or greater than 50 Mg per year NMOC. If the uncontrolled NMOC emissions exceed 50 Mg per year, the installation must meet the requirements in this provision by the date the landfill is required to install a collection and control system by 40 CFR 60.752(b)(2) of Subpart WWW.

40 CFR Part 63, Subpart ZZZZ - *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
The provisions of this subpart apply to stationary reciprocating internal combustion engines located at major and area sources of HAP emissions.
This subpart applies to the 60 kW (20HP) Backup Generator at Scalehouse and has been applied in Permit Condition 6. The requirements and limitations for RICE units with less than 500 Hp was applied to the 60 kW generator because it does not exceed the 500 Hp category.

40 CFR Part 63, Subpart CCCCCC - *National Emission Standard for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*
The provisions of this subpart establishe national emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF).
This subpart applies to EU07 the 500 Gallon Unleaded Gasoline Fuel Storage Tank and has been applied in Permit Condition 9.

Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*
The CAM rule applies to each pollutant specific emission unit that:
Is subject to an emission limitation or standard, and
Uses a control device to achieve compliance, and
Has pre-control emissions that exceed or are equivalent to the major source threshold.
40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard. At current the current NMOC emission rate the flare is not required to be used, when the NMOC emission rate exceeds 50 megagrams per year a collection and control system (the flare) will be required (§60.752(b)(2)).

Greenhouse Gas Emissions
This installation is not a major source for greenhouse gases. Major stationary sources are required by the Clean Air Act (CAA) to obtain Part 70 operating permits. While Part 70 permits generally do not establish new emissions limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020(2)(A)23, into a comprehensive air permit. At the time of permit issuance, there were no applicable GHG requirements for this source.

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 operating permits at this time. In addition, Missouri regulations do not require the installation to report CO_2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2 emissions were not included within this permit. An estimate of CO_2 emissions are included in the statement of basis.

Updated Potential to Emit for the Installation in Tons per year[1]

Pollutant	Other Emission Units	Uncontrolled Landfill	Flare Emissions	Landfill Fugitives Not Captured By Flare	Combined Flare and Landfill Fugitive - Current Operating Conditions	Site Wide PTE - Current Operating Conditions
	A	B	C	D	E = C+D	F = A + E
CO	0.53		197.1		197.1	197.63
HAP		23.87	0.017	11.06	11.077	11.077
NOx	2.46		10.51		10.51	12.97
PM			1.12		1.12	1.12
PM10	2372.69		4.47		4.47	2377.16
PM2.5	687.79		4.47		4.47	692.26
SOx	0.159		3.67		3.67	3.829
VOC	0.19	7.28	0.07	8.53	8.6	8.79
NMOC		11.01	0.12	5.1	5.22	5.22
CO2		21955.21	60059.28	10172.93	70232.21	70232.21
CH4		7201.67	1.88	3336.89	3338.77	3338.77
N2O			0.37		0.37	0.37
GHG Mass		29156.88	60060.53	13509.81	73570.34	73570.34
GHG CO2e		201996.91	60220.7	93595.07	153815.77	153815.8

City of Springfield Sanitary Landfill consists of a landfill, flare, and other emission units. At current operating and emission conditions the permittee is not required to operate a collection and control system (flare) at this time because NMOC emission rate is not greater than 50 megagrams per year. Column A "Other Emission Units" are storage tanks, emergency generators, and haul roads. Column B "Uncontrolled Landfill" are potential emissions from the landfill without any collection and control system operating. Column C "Flare Emissions" are emissions from the flare unit with Column D "Landfill Fugitives Not Captured By Flare" are fugitive emissions from the landfill not captured by the flare. Column E "Combined Flare and Landfill Fugitive - Current Operating Conditions" are the sum of potential emissions from the landfill and flare, this is current operating conditions. Column F "Site Wide PTE - Current Operating Conditions" are potential emissions from the landfill, flare, and other units on the site.

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

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:

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

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

Response to Public Comments

A draft of the Springfield Sanitary Landfill Part 70 Operating Permit was placed on public notice on April 30, 2015, by the Missouri Department of Natural Resources (MDNR). Comments were received on May 27, 2015 from Mark Smith, Air Permitting and Compliance Branch Chief of the Environmental Protection Agency Region 7. The nine comments are presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following. On May 21, 2015 comments were received from Springfield Sanitary Landfill. The seven comments are addressed below. The comments are addressed in the order in which they appear within the letter(s).

EPA Comment #1:
The **Statement of Basis**, attached to the draft operating permit renewal for the City of Springfield Sanitary Landfill, indicates that 40 CFR part 61, Subpart M; *National Emission Standards for Asbestos* is applicable. The Statement of Basis also indicates that the requirements can be found in the Core Section (Section IV) of this operating permit. Section IV includes two (2) specific permittee requirements related to the *National Emission Standards for Asbestos,* specifically incorporating by reference standards found in 40 CFR 61.154. This approach to incorporating by reference into a Title V/Part 70 permits adds no value to understanding the source's specific compliance obligations. One of the goals of the Title V/Part 70 program was that both the source and permitting authority would gain a better understanding of the specific requirements applicable to the source which would lead to improved compliance. There is a value to be gained by studying the specific requirements of a standard, culling out those requirements that apply to the source, and translating them in a logical fashion as operating permit conditions.

MDNR rules and regulations have incorporated by reference the EPA promulgated New Source Performance Standards, Maximum Achievable Control Technology Standards; and Emission Standards for Hazardous Air Pollutants. It is MDNR customary practice to detail out the specific requirements of these incorporated standards as specific permit conditions; either as plant wide or emission unit specific conditions. EPA supports MDNR's customary practices and strongly recommends that MDNR incorporate 40 CFR part 61, Subpart M requirements into a specific permit condition(s).

Missouri Air Pollution Control Program Response to EPA Comment #1:
40 CFR Part 61 Subpart M has been applied in Permit Condition 2.

EPA Comment #2:
Plant Wide Condition 1 requires the City of Springfield Sanitary Landfill to maintain a daily record of material processed and demonstrate that the daily impact on the ambient air quality from the source does not exceed the daily NAAQS of 150µg/m^3 for Particulate Matter less than ten microns in diameter (PM_{10}) at or beyond the property boundary. This requirement is taken directly from Construction Permit #112002-010, issued on November 8, 2001, in which City of Springfield Sanitary Landfill provided modeling results apparently based on various daily material amounts processed and the resulting effect on the NAAQS. The Clean Air Act has a statutory scheme whereby EPA sets a NAAQS and then requires states to determine the best way to attain and maintain the NAAQS within their boundaries. The NAAQS, by itself, does not impose any obligation on sources and NAAQS themselves are not applicable requirements and therefore are not a federally enforceable requirement. If Plant Wide

Condition 1 remains as is, then it should be clearly stated that it is a "State Permit Requirement Only." However, for the City of Springfield Sanitary Landfill, the maximum daily amount of material processed, that does not contribute to a NAAQS exceedance, could easily be an applicable requirement subject to federal enforcement and EPA recommends that maximum value be used as the emission limitation in Plant Wide Condition 1.

Also, the **Emission Limitation** and the **Emission Limitation / Monitoring** requirement 2), in **Plant Wide Condition 1**, are identical. EPA suggests MDNR remove the redundancy.

Finally, **Record keeping** requirement in Plant Wide Condition 1 says "permittee shall use Attachment A – PM_{10} Compliance Worksheet or an equivalent form." As written this requirement is not practically enforceable. All of the requirements detailed in each Part 70/Title V operating permit condition must be practically enforceable. EPA's primary guidance on practical enforceability is contained in "*Guidance on Limiting Potential to Emit in New Sources Permitting*," dated June 13, 1989. One of the important measures of practical enforceability is for the requirements to identify the "who," "what," "where," "when," "how," and "how often." This record keeping requirement does not answer all of the necessary components to achieve practical enforceability, so EPA recommends MDNR make the necessary revisions to ensure that the "who," "what," "where," "when," "how," and "how often" is addressed.

Also, Attachment A requires the use of ambient impact factors and a background impact factor which appear to be emission factors. However, the derivation and / or reference of these emission factors are not discussed in the draft operating permit or on Attachment A. The lack of the source of these apparent emission factors renders Attachment A practically unenforceable. EPA strongly recommends MDNR provide the ambient impact and the background impact emission factors and a discussion of their derivation.

Missouri Air Pollution Control Program Response to EPA Comment #2:
"This requirement is not federally enforceable and is a state only requirement." Has been added to Plant Wide Condition 1.

The NAAQS requirements and limitations have been removed. See City of Springfield Sanitary Landfill Comment #1.

The redundant odor requirement has been removed.

EPA Comment #3:
Permit Condition 1 incorporates applicable requirements from 40 CFR part 60, Subpart WWW; *Standards of Performance for Municipal Solid Waste Landfills*. Within the individual requirements in Permit Condition 1, there are several references to the "**Administrator**." (emphasis added). MDNR indicates in 10 CSR 10-6.070 that they have adopted by reference 40 CFR part 60, Subpart WWW, therefore, EPA suggest the "Director" is a more appropriate individual than "Administrator" and recommends MDNR make the substitution.

Missouri Air Pollution Control Program Response to EPA Comment #3:
The draft was corrected as suggested.

EPA Comment #4:
Emission Limitation 1), in **Permit Condition 2**, establishes an opacity limit for any "new" source. However, the term "new" is undefined and it is not known whether or not and emission unit installed in 2006 is "new." EPA recommends MDNR define the term "new" in Permit Condition 2.

Also, **monitoring / record keeping** requirement 1), in Permit Condition 2, says the permittee shall conduct opacity reading on each emission unit. This statement would make it appear that there is more than one applicable emission unit. EPA suggests MDNR specify that the permittee shall conduct opacity readings on emission unit EU15.

Missouri Air Pollution Control Program Response to EPA Comment #4:
Permit Condition 2 was renamed Permit Condition 3. Reference to "new" was removed and the monitoring/recordkeeping requirement was modified to address one unit.

EPA Comment #5:
Emission Limitation 1., in **Permit Condition 4**, requires the permittee to apply water to maintain 50% control efficiency on the improved section of the waste haul road, the borrow pit haul road, and the storage pile vehicular traffic areas. The term "50% control efficiency" is too vague to be enforced. A Part 70 permit must contain requirements that are sufficiently clear and specific to ensure that those requirements are enforceable as a practical matter. A permit is enforceable as a practical matter if the permit conditions establish a clear legal obligation for the source and allow compliance to be verified. Additionally, the monitoring / record keeping, in Permit Condition 4, says that "there is no monitoring or record keeping required." So, if there is no monitoring or record keeping required, there appears to be no way the permittee can verify they have satisfied the 50% control efficiency emission limitation. Therefore, this permit condition cannot be practically enforced and EPA recommends MDNR revise Permit Condition 4 to ensure it is practically enforceable.

Missouri Air Pollution Control Program Response to EPA Comment #5:
Permit Condition 4 was renamed Permit Condition 5. Best Management Practices have been added as an attachment and referenced in Permit Condition 5.

EPA Comment #6:
Permit Condition 5 incorporates applicable requirements from 40 CFR part 63, Subpart ZZZZ; *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (RICE MACT). The City of Springfield Sanitary Landfill is considered an area hazardous air pollutant (HAP) source. To date, MDNR has not accepted and taken over the compliance responsibilities of the area source RICE MACT and as such relies on the EPA to monitor and manage area source compliance. However, the compliance notification and reporting included in Permit Condition 5 requires the permittee to submit reports to MDNR. EPA contends that if the EPA is responsible for compliance, then the EPA should be the primary recipient of the compliance notifications and reports; with MDNR receiving duplicate copies. Therefore, EPA recommends MDNR add specific clarifying language into the permit condition to show EPA as the primary compliance information recipient related to HAPs and MDNR as secondary.

Missouri Air Pollution Control Program Response to EPA Comment #6:
Permit Condition 5 was renamed Permit Condition 6. The permit condition has been modified as suggested.

EPA Comment #7:
Permit Condition 7 requires the permittee to maintain an accurate record of the sulfur content of the fuel used in three (3) internal combustion engines driving emergency generators. Permit Condition 7 also limits permittee to discharging gases containing less than 500 ppm_v of sulfur dioxide or 35 $\mu g/m^3$ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour period. However, there is no explanation in the operating permit that shows the relationship between sulfur content in fuel and the stack gas concentration of the three sulfur off-gases. Additionally, it is MDNR's customary practice to include examples of record keeping used by the permittee to verify compliance as attachments and to reference the attachments in the permit conditions. EPA recommends MDNR show the relationship between the sulfur content in the fuel and the exhaust gas concentrations of sulfur dioxide, sulfuric acid and sulfur trioxide and include the data record example as an attachment with appropriate references.

Missouri Air Pollution Control Program Response to EPA Comment #7:
Permit Condition 7 was renamed Permit Condition 8. Calculations have been added to the Statement of Basis to display the relationship between the sulfur content in the fuel and exhaust gas concentrations.

EPA Comment #8:
Permit Condition 6 and **Permit Condition 8** both include a reference to the "Administrator" and EPA believes the "Director" may be a more appropriate individual. EPA suggests MDNR replace "Administrator" with "Director."

Missouri Air Pollution Control Program Response to EPA Comment #8:
Permit Condition 6 was renamed Permit Condition 7 and Permit Condition 8 was renamed Permit Condition 9. The permit conditions have been modified as suggested.

EPA Comment #9:
The language regarding the written notification requirement for Off-Permit Changes in Section V, used in operating permits, has recently been modified to match the wording in 10 CSR 10-6.065(6)(C)5. EPA recommends MDNR use the new Off-Permit Change wording in the City of Springfield Sanitary Landfill operating permit.

Missouri Air Pollution Control Program Response to EPA Comment #9:
The language has been modified as suggested.

City of Springfield Sanitary Landfill Comment #1
Page 6: Emissions limitation/monitoring: 1) - refers to the requirement to track daily material processed to demonstrate compliance with the ambient air quality standards. The majority of the equipment used to develop the ambient impact factors are gone (this is referenced in the statement of basis) and the remaining emission units use Best Management Practices to control emissions. Per MDNR guidance, emissions units using BMPs to control emissions are not included in the development of ambient air impact factors. Therefore, the ambient impact factors are not representative of current conditions/operations and should be removed from the permit - we have requested this before and appears to be an oversight.

Missouri Air Pollution Control Program Response to City of Springfield Sanitary Landfill Comment #1
Permit Condition 1 has been modified as requested.

City of Springfield Sanitary Landfill Comment #2
Page 6: Emissions limitation/monitoring: 2) - references odor nuisance per 10 CSR-4.070 – this rule was rescinded in November 2010 and replaced with 10 CSR 10-6.165, which is already included on page 6. This should be deleted.

Missouri Air Pollution Control Program Response to City of Springfield Sanitary Landfill Comment #2
The reference to the rescinded rule has been removed.

City of Springfield Sanitary Landfill Comment #3
Page 6: Recordkeeping and Reporting:2) - Both of these are related to the recordkeeping for the ambient air impacts - should be deleted as this should not be applicable.

Missouri Air Pollution Control Program Response to City of Springfield Sanitary Landfill Comment #3
Recordkeeping and Reporting were removed because the limitations and conditions they referred to have been removed.

City of Springfield Sanitary Landfill Comment #4
Page 12: Visible emissions from the flare-The City requests to change this to use Method 22-like procedures instead of Method 22

Missouri Air Pollution Control Program Response to City of Springfield Sanitary Landfill Comment #4
The Permit Condition has been modified as requested in Permit Condition 3 Landfill Gas Flare.

City of Springfield Sanitary Landfill Comment #5
Page 12: Visible emissions monitoring frequency- the flare does not operate frequently; however the permit is initially requiring weekly observations. This needs to be reworded to account for the fact that the flare may not be operating but a few times a year. The City is requesting to monitor monthly, only during months during which the flare operates.

Missouri Air Pollution Control Program Response to City of Springfield Sanitary Landfill Comment #5
Permit Condition 3 Landfill Gas Flare has been modified to weekly observations then monthly during the months the flare is operational.

City of Springfield Sanitary Landfill Comment #6
Pages 15 and 18 - minor typographic or naming corrections *note: the permittee submitted a marked draft with the typographic or naming corrections indicated.*

Missouri Air Pollution Control Program Response to City of Springfield Sanitary Landfill Comment #6
The draft has been modified as requested.

City of Springfield Sanitary Landfill Comment #7
Remove Attachment A from the permit - not applicable as equipment is no longer on site or BMP are being used to control PM_{10} emissions. This will require modifying references to Attachment B and C.

Missouri Air Pollution Control Program Response to City of Springfield Sanitary Landfill Comment #7
See response to City of Springfield Sanitary Landfill Comment #1. The NAAQS tracking sheet has been removed and replaced with Best Management Practices, keeping Attachment B and C unchanged.

Erick Roberts
City of Springfield Sanitary Landfill
840 N. Boonville Ave
Springfield, MO 65801

Re: City of Springfield Sanitary Landfill, 077-0161
Permit Number: OP2015-050

Dear Sir:

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:TEL

Enclosures

c: PAMS File: 2011-01-060