

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2017-082
Expiration Date: NOV 29 2022
Installation ID: 077-0163
Project Number: 2015-05-007

Installation Name and Address

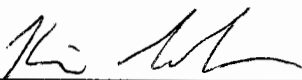
Fulbright Treatment Plant
3920 North Farmer Road
Springfield, MO 65802
Greene County

Parent Company's Name and Address

City Utilities of Springfield
301 E. Central, P.O. Box 551
Springfield, MO 65801-0551

Installation Description:

Fulbright Treatment Plant is a drinking water facility owned and operated by City Utilities of Springfield, MO, a municipally-owned electric, gas, water, transit, and broadband utility company. McDaniel Lake, Fulbright Spring, and Well #1 provide the raw water resources. Raw water is treated to drinking water quality and pumped to storage facilities located both on-site and throughout the distribution system. This installation is a minor source of criteria pollutants but has opted into an intermediate operating permit.


Prepared by:
Kasia Wasescha
Operating Permit Unit

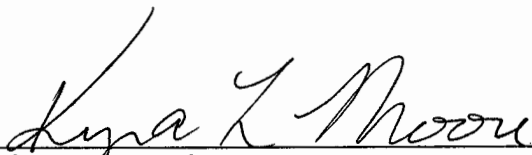

Director or Designee
Department of Natural Resources
NOV 29 2017
Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Point	Description
E02	900 HP Emergency Diesel Engine (Pump)
E03	800 HP Emergency Diesel Engine (Pump)
E04	1000 HP Emergency Diesel Engine (Pump)
E10	Carbon Slurry Vent; 0.75 tons/hr
E28	Soda Ash Hopper Unloading Chute; 26.7 tons/hr
E29	Soda Ash Injection; 26.7 tons/hr
E41	514 HP Emergency Diesel Engine (for 350 HP Water Pump) McDaniel Lake
E42	490 HP Emergency Diesel Engine (For 540 HP Water Pump) McDaniel Lake
E50	923 HP Emergency Backup Diesel Generator

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Point	Description
E06	0.66 MMBtu/hr Building Heat Boiler (natural gas)
E09	Carbon Additive Unloading; 26.7 tons/hr
E12	Membrane Roof System Breathing Vents (8)
E13	2,500 Gallon Diesel Storage Tank
E14	2,500 Gallon Diesel Storage Tank
E20	0.41 MMBtu/hr Infrared Radiant Heaters (5) (natural gas)
E24	Chlorine Emergency Diaphragm Air Vents (2)
E30	260 Gallon Above Ground Diesel Fuel Storage Tank
E31	Potassium Permanganate Unloading/Addition; 0.25 tons/hr
E43	Diesel Storage Tank McDaniel Lake – 560 Gallons
E44	Diesel Storage Tank McDaniel Lake – 560 Gallons
E45	Carbon Additive Unloading/Water Injection
E46	Oxidant Additive Unloading
E51	6,000 Gallon Diesel Storage Tank

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

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

Emission Limitation:

The permittee shall emit less than the major source threshold.¹

Recordkeeping:

1. The permittee shall demonstrate compliance through the most current Emission Inventory Questionnaire (EIQ) submittal.²
2. The permittee shall keep all EIQ records for a minimum of five (5) years.
3. All records shall be immediately available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

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

¹ The major source threshold for SO_x, NO_x, VOC, CO, PM₁₀, and PM_{2.5} is 100 tons/year. For total HAPs the major source threshold is 25 tons/year and for each individual HAP the major source threshold is 10 tons/year.

² The potential-to-emit (PTE) calculation indicates that the installation shall always remain under the major source threshold with the emission points of this operating permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001	
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	
Emission Point	Description
E10	Carbon Slurry Vent; 0.75 tons/hr
E28	Soda Ash Hopper Unloading Chute; 26.7 tons/hr
E29	Soda Ash Injection; 26.7 tons/hr

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission points 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 60%.

Monitoring:

1. The permittee shall conduct opacity readings on each emission point using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible emissions using these procedures, then no further observations are required. For emission points with visible emissions, the source representative would then conduct a Method 9 observation.
2. The permittee must maintain the following monitoring schedule. Issuance of a renewal operating permit does not restart this schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachments A and B (or their equivalents), 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. The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
4. The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring reports and compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

PERMIT CONDITION 002	
10 CSR 10-6.065. Voluntary Limitation(s)	
Emission Point	Description
E02	900 HP Emergency Diesel Pump Engine
E03	800 HP Emergency Diesel Pump Engine
E04	1000 HP Emergency Diesel Pump Engine
E41	514 HP Emergency Diesel Engine (For 350 HP Water Pump) McDaniel Lake
E42	590 HP Emergency Diesel Engine (For 540 HP Water Pump) McDaniel Lake

Operational Limitation:

The permittee shall not use fuel in these emission units that contain more than 0.5 weight percent sulfur.

Monitoring/Recordkeeping:

1. The permittee shall determine compliance using fuel delivery records, fuel sampling and analysis, or fuel supplier certifications.
2. If the permittee is using fuel delivery records for compliance they must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
 - a) The name, address, and contact information of the fuel supplier;
 - b) The type of fuel;
 - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
 - d) The heating value of the fuel.
3. The permittee shall maintain all records for a minimum of five (5) years on-site.
4. The permittee shall make all records immediately available to Missouri Department of Natural Resources personnel upon request.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring reports and compliance certification required by Section V of this permit.

2. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

PERMIT CONDITION 003	
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Point	Description
E02	900 HP Emergency Diesel Pump Engine
E03	800 HP Emergency Diesel Pump Engine
E04	1000 HP Emergency Diesel Pump Engine
E41	514 HP Emergency Diesel Engine (For 350 HP Water Pump) McDaniel Lake
E42	590 HP Emergency Diesel Engine (For 540 HP Water Pump) McDaniel Lake

Operational Limitation:

1. The permittee must meet the requirements in Table 2d of MACT ZZZZ that apply to the engines. [§63.6603]
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first³.
 - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

General Compliance Requirements:

1. The permittee must be in compliance with the operating limitations in this permit condition at all times. [§63.6605(a)]
2. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the 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. [§63.6605(b)]
3. The permittee must operate and maintain the stationary RICE according to the manufacturer’s emission-related written instructions or the permittee shall develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)(2)]
4. The permittee shall install a non-resettable hour meter on the engines if one is not already installed. [§63.6625(f)]

³ Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2 of MACT ZZZZ.

General Provisions:

The permittee shall comply with each of the General Provisions that apply to the emergency engine as listed in Table 8 of MACT ZZZZ. [§63.6640(e)]

Continuous Compliance Requirements:

1. The permittee shall demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
 - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2. The permittee shall report each instance in which they did not meet the requirements of this permit condition or Table 2d of MACT ZZZZ according to the requirements in §63.6650. [§63.6640(b)]
3. The permittee shall report each instance which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
4. The emergency generator shall be operated according to the following requirements: [§63.6640(f)]
 - a) There is no time limit on the use of the emergency generator in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency generator for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
 - i) The emergency generator 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 the emergency generator beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - 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). 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)(4)]

Notifications:

The permittee shall submit required notifications as specified in §63.6645.

Recordkeeping:

1. The permittee shall keep the following records: [§63.6655(a)]

- a) A copy of each notification and report that they submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
 - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
2. The permittee must keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
 3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that they operated and maintained the stationary RICE according to their own maintenance plan. [§63.6655(e)]
 4. 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. [§63.6655(f)]
 5. Records may be kept in either written or electronic form and maintained for at least five years. [§63.6660(c)]
 6. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request. [§63.6660(a)]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004	
10 CSR 10-6.070, New Source Performance Regulations 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Point	Description
E50	923 hp Caterpillar Emergency Diesel Generator Engine; Model Year 2011; Installed 2011

Emission Limitations:

1. The permittee must comply with the emission standards for new non-road CI engines in §60.4202 for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [§60.4205(b)]
 - a) The emergency engine shall not emit more than: [§60.4202(a)(2) & §89.112(a)]
 - i) 6.4 g/kW-hr NMHC + NO_x;
 - ii) 3.5 g/kW-hr CO;
 - iii) 0.20 g/kW-hr PM.
 - b) Exhaust opacity from CI non-road engines must not exceed: [§89.113(a)]
 - i) 20 percent during the acceleration mode;
 - ii) 15 percent during the lugging mode;
 - iii) 50 percent during the peaks in either the acceleration or lugging modes.
2. The permittee must operate and maintain the stationary CI ICE that achieve the emission standards as required in §60.4205 over the entire life of the engine. [§60.4206]

Operational Limitations:

1. The permittee must purchase diesel fuel that meets the requirements of 40 CFR §80.510(b) for nonroad diesel fuel. [§60.4207(b)]
 - a) All diesel fuel is subject to the following per gallon standards: [§80.510(b)]
 - i) A maximum sulfur content of 15 ppm: [§80.4207(b)(1)]
 - ii) A cetane or aromatic content, as follows: [§80.4207(b)(2)]
 - (1) A minimum cetane index of 40; or
 - (2) A maximum aromatic content of 35 volume percent.
2. The permittee must install a non-resettable hour meter on the engine if one is not already installed. [§60.4209(a)]

Compliance Requirements:

1. The permittee shall do all of the following, except as permitted under §60.4211(g): [§60.4211(a)]
 - a) Operate and maintain the stationary CI ICE according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
 - b) Change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
 - c) Meet the requirements of 40 CFR parts 89, 94, and/or 1068, as they apply. [§60.4211(a)(3)]
2. The engine shall certified to the emission standards in §60.4205(b), as applicable, for the same model year and engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. [§60.4211(c)]
3. The permittee must operate the emergency stationary ICE according to the requirements of §60.4211(f)(1) through (f)(3). In order for the engine to be considered an emergency stationary ICE under NSPS 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 the permittee does 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 their emergency stationary ICE for any of the purposes specified in §60.4211(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by §60.4211(f)(2). [§60.4211(f)(2)]
 - i) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. [§60.4211(f)(2)(i)]
- c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance provided in §60.4211(f)(2). Except as provided in §60.4211(f)(3)(i) of this section, 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 according to §60.4211(f)(3)(i)(A) through (E). [§60.4211(f)(3)]
- d) If the permittee does not install, configure, operate, and maintain the engine according to the manufacturer's emission-related written instructions, or if they change the emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: [§60.4211(g)]
 - i) 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 must conduct an initial performance test according to §60.4212 in order to demonstrate compliance with the applicable emissions standards within 1 year after the engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer. [§60.4211(g)(2)]

General Provisions:

The permittee shall comply with the General Provisions in §§60.1 through 60.19 that apply as listed in Table 8 of NSPS III. [§60.4218]

MACT ZZZZ:

If the permittee meets all the requirements of NSPS III for the engines of this permit condition, no requirements are needed to be met under MACT ZZZZ, as compliance is met with MACT ZZZZ by complying with NSPS III. [§63.6590(c)]

Recordkeeping/Reporting:

1. If the engine does not meet the standards applicable to non-emergency engines, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are

recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation at that time. [§60.4214(b)]

2. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance or violation of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance or violation of this regulation.
3. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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

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

Emission Limitation:

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

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.

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

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

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

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

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

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

None.

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

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

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

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

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

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

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

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

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

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

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

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

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

VI. Attachments

Attachments follow.

Attachment A
Opacity Emission Observations

Date	Time	Emission Source	Visible Emissions		Excess Emissions		
			No	Yes ⁴	Cause	Corrective Action	Initial

⁴ If there are visible emissions, the permittee shall complete a Method 9 Opacity Observation.

Attachment B

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

Readings ranged from _____ to _____ % opacity.

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

Attachment C
 10 CSR 10-6.400 Compliance Demonstration

This attachment demonstrates that the listed emission units are in compliance with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*.

Emission Point	Description	MHDR (tons/hr)	Uncontrolled PM Emission Factor (lbs/ton)	Source (SCC)	Uncontrolled Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)	Exempt?
E10	Carbon Slurry Vent	0.75	0.1	30501608	0.08	-	Yes, < 0.5 lb/hr
E28	Soda Ash Hopper Unloading Chute	26.7	0.1	30501608	2.67	37.03	Yes, under limit
E29	Soda Ash Injection	26.7	0.07	30501612	1.87	37.03	Yes, under limit

While E09, E31, E45, and E46 emit particulate matter, they are considered fugitive in nature and are thus exempt from 10 CSR 10-6.400.

STATEMENT OF BASIS

Voluntary Limitations

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

INSTALLATION DESCRIPTION

Fulbright Treatment Plant is a drinking water facility owned and operated by City Utilities of Springfield, MO, a municipally-owned electric, gas, water, transit, and broadband utility company. McDaniel Lake, Fulbright Spring, and Well #1 provide the raw water resources. Raw water is treated to drinking water quality and pumped to storage facilities located both on-site and throughout the distribution system.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ⁵
PM ₁₀	23.88
PM _{2.5}	11.28
CO	7.07
NO _x	28.64
SO _x	0.01
VOCs	1.52
Total HAPs ⁶	0.17
Chlorine (7782-50-5)	0.10

⁵ Each emission point was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. Emergency engines were calculated at 500 hours of uncontrolled annual operation. While the uncontrolled PTE calculation demonstrates that the installation is below the major levels for an intermediate operating permit and could be downgraded to a basic operating permit, the installation requested that the facility remain at an intermediate permitting level.

⁶ HAPs under 0.1 tons/year not listed but are still represented in Total HAPs.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.04	0.02	0.11	0.01	0.02
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.04	0.02	0.11	0.01	0.02
Sulfur Oxides (SO _x)	< 0.01	< 0.01	< 0.01	0.01	0.02
Nitrogen Oxides (NO _x)	0.52	0.30	1.54	0.20	0.25
Volatile Organic Compounds (VOC)	0.04	0.02	0.12	0.01	0.02
Carbon Monoxide (CO)	0.13	0.09	0.36	0.07	0.07
Hazardous Air Pollutants ⁷ (HAPs)	-	-	-	-	-

Permit Reference Documents

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

1. Intermediate Operating Permit Application, received May 4, 2015;
2. 2016 Emissions Inventory Questionnaire, received March 24, 2017; and
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
4. No Construction Permit Required Project #2005-02-040, Completed March 8, 2005
5. No Construction Permit Required Project #2011-04-051, Completed May 31, 2011

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

⁷ HAPs below the reporting threshold in the EIQ.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This rule does not apply. This rule does not apply to the emission points fueled solely by natural gas. The installation has voluntarily taken on a more stringent sulfur limitation (for the emission sources not exempted through fuel type) than required by this rule. As a result, these emission sources are exempt from this rule per 10 CSR 10-6.261(1)(C)2.

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

This rule does not apply. This rule does not apply to the engines because they do not meet the definition of process weight. See Attachment C for calculations that demonstrate exemptions for the other emission points.

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

This rule does not apply because the indirect heating equipment (E06 and E20) are fueled by natural gas.

Construction Permit History

No Construction Permit Required, Project #2005-02-040, Completed March 8, 2005

This determination was made for the like-kind replacement of a 400 hp emergency diesel engine.

No Construction Permit Required, Project #2011-04-051, Completed May 31, 2011

This determination was made for the construction of an emergency diesel generator (E50).

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart does not apply. All heating units at the installation have a heat capacity below 10 MMBtu/hr.

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

This subpart applies. This subpart applies to the 923 hp emergency diesel compression ignition engine because it was manufactured after April 1, 2006. [§60.4200(a)(2)(i)] Engines E01, E02, E03, E04, E41, and E42 were installed prior to this compliance date and thus are not subject to this rule.

40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

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*

These regulations do not apply to the storage tanks. The smallest size tank covered by these regulations is 19,813 gallons. The storage tanks at this installation have capacities less than the applicability threshold.

Maximum Achievable Control Technology (MACT) Applicability

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

This subpart applies to the engines of this installation and has been applied within this permit.

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

This subpart does not apply. The boilers are gas-fired and are thus exempt.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Greenhouse Gas Emissions

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

Other Regulatory Determinations

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

While this rule applies, it is unlikely that particulate matter will emit beyond the installation's property line in any significant quantities due to the nature and location of its emission points. As a result, the monitoring and recordkeeping requirements of this condition have been removed from the Core Permit Requirements.

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

This rule applies to the installation and has been applied within this permit. The engines of this installation are exempt per 10 CSR 10-6.220(1)(A) as are the units burning solely natural gas per 10 CSR 10-6.220(1)(L).

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

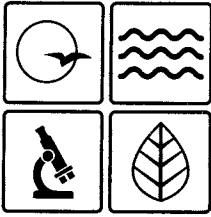
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

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

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

Response to Public Comments

A permit draft for this installation was placed up on public notice on October 20, 2017 for 30 days. During this time period no public comments were received.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

NOV 29 2017

Mr. Daniel Hedrick
Fulbright Treatment Plant
P.O. Box 551
Springfield, MO 65801

Re: Fulbright Treatment Plant, 077-0163
Permit Number: OP2017-082

Dear Mr. Hedrick:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kwj

Enclosures

c: PAMS File: 2015-05-007

