



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 here in.

Intermediate Operating Permit Number: OP2011-018
Expiration Date: MAY 02 2016
Installation ID: 510-0175
Project Number: 2008-11-003

Installation Name and Address

St. Louis Metallizing Company
4123 Sarpy Avenue
St. Louis, MO 63110-1745
City of St. Louis

Parent Company's Name and Address

CIC Group Inc.
P.O. Box 66514
St. Louis, MO 63166-6514

Installation Description:

St. Louis Metallizing Company (SLM) is located within the City of St. Louis, Missouri. It is a full-service quality thermal spray and finishing shop, offering a complete production facility for preparation, thermal spray, finishing, quality assurance and technical assistance to original equipment manufacturers as well as customers who require restoration of parts.

St. Metallizing is a major source of particulate matter less than or equal to ten microns (PM-10). The installation has accepted voluntary, federally enforceable emission limitations limiting PM-10 emissions to less than major source level to qualify for this permit.

MAY 03 2011

Effective Date

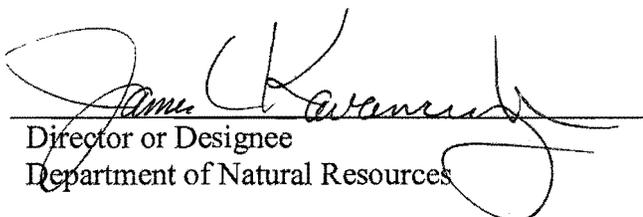

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	4
INSTALLATION DESCRIPTION	4
EMISSION UNITS WITH LIMITATIONS	5
EMISSION UNITS WITHOUT LIMITATIONS.....	5
II. PLANT WIDE EMISSION LIMITATIONS.....	6
Permit Condition PW001	6
10 CSR 10-6.065 Operating Permits.....	6
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	6
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	7
EU0010, EU0020 AND EU0060 – ABRASIVE BLAST UNITS.....	7
Permit Condition EU0010-001, EU0020-001 and EU0060-001	7
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes	7
10 CSR 10-6.060 Construction Permits Required.....	7
Construction Permit No. 032007-006 (Cartridge Filters Requirement)	7
Permit Condition EU0010-002, EU0020-002 and EU0060-002.....	8
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	8
EU0050 – SAFETY KLEEN PARTS WASHERS	9
Permit Condition EU0050-001.....	9
10 CSR 10-5.300 Control of Emissions from Solvent Cleaning	9
EU0100 – VAPOR DEGREASER.....	11
Permit Condition EU0100-001.....	12
10 CSR 10-5.300 Control of Emissions from Solvent Cleaning	12
10 CSR 10-6.060 Construction Permits Required.....	12
St. Louis City APCP Construction Permit No. 06-01-002.....	12
EU0070, EU0110 THROUGH EU0130, EU0160, EU0180 THROUGH EU0220, AND EU0250 - THERMAL SPRAYING PROCESS	14
Permit Condition EU0070-001,.....	14
Permit Condition EU0110-001 through EU0130-001,.....	14
Permit Condition EU0180-001 through EU0220-001, and	14
Permit Condition EU0250-001	14
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes	14
10 CSR 10-6.060 Construction Permits Required.....	14
Construction Permit No. 032007-006 (Cartridge Filters Requirement)	14
Permit Condition EU0070-002,.....	16
Permit Condition EU0110-002 through EU0130-002,.....	16
Permit Condition EU0180-002 through EU0220-002, and	16
Permit Condition EU0250-002.....	16
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	16
Permit Condition EU0070-003,.....	17
Permit Condition EU0110-003 through EU0130-003,.....	17
Permit Condition EU0180-003 through EU0220-003, and	17
Permit Condition EU0250-003.....	17
40 CFR Part 63, Subpart WWWW.....	17
National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations.....	17
Permit Condition EU0070-004,.....	19
Permit Condition EU0110-004 through EU0130-004,.....	19
Permit Condition EU0180-004 through EU0220-004, and	19
Permit Condition EU0250-004.....	19
40 CFR Part 63, Subpart WWWW.....	19

National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations.....	19
– §63.11510 - General Provisions.....	19
40 CFR Part 63, Subpart A, General Provisions.....	19
Permit Condition EU0180-005 through EU0220-005.....	19
10 CSR 10-6.060 Construction Permits Required.....	19
City of St. Louis APCD Construction Permit No. 02-10-024.....	19
EU0230 – SPACE AND WATER HEATERS	20
Permit Condition EU0230-001.....	20
10 CSR 10-6.070	20
40 CFR Part 60 Subpart Dc	20
IV. CORE PERMIT REQUIREMENTS	21
V. GENERAL PERMIT REQUIREMENTS.....	27
VI. ATTACHMENTS	31
Attachment A: Plant-Wide Voluntary Emissions Limit.....	32
Attachment B-1: Pressure Drop Log for Cartridge Filters	33
Attachment B-2: Cartridge Filters Operation and Maintenance Log	34
Attachment B-3: Water Curtain Inspection Log	35
Attachment C-1: Opacity Emission Observations.....	36
Attachment C-2: Method 9 Opacity Emissions Observation	37
Attachment D-1: Solvent Containing Waste Transfer Log	38
Attachment D-2: Inspection/Maintenance/Repair/Malfunction Log.....	39
Attachment D-3: Purchase Records for Cold Cleaning Solvent.....	40
Attachment D-4: Employee Solvent Metal Cleaning Training Log.....	41
Attachment E: Molten Metal Spray Booth Applied Product Log	42
Attachment F - Inspection/Maintenance/Repair/Malfunction Log.....	43

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

St. Louis Metallizing Company (SLM) is located within the City of St. Louis, Missouri. It is a full-service quality thermal spray and finishing shop, offering a complete production facility for preparation, thermal spray, finishing, quality assurance and technical assistance to original equipment manufacturers as well as customers who require restoration of parts.

The company's capabilities include: High Velocity Oxy-Fuel (HVOF), plasma thermal spray, electric arc and powder and wire combustion processes. Six-axis robots support production capabilities for printing cylinder restoration, turbine components, hydraulic cylinder rods, and rotating equipment.

SLM is a major source of PM-10 and was issued a Part 70 operating permit (OP2004-013). The installation has accepted voluntary, federally enforceable emission limitations limiting PM-10 emissions to less than major source level to qualify for this permit.

The actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year					
Pollutants	2009	2008	2007	2006	2005
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.27	0.34	0.14	0.15	0.11
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.00	0.00	0.00	0.00	0.00
Sulfur Oxides (SO _x)	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	0.29	0.33	0.29	0.34	0.27
Volatile Organic Compounds (VOC)	2.57	4.38	4.05	6.91	0.14
Carbon Monoxide (CO)	0.07	0.08	0.10	0.10	0.05
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	0.00	0.00	0.25	0.65	8.11
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.

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0010	EP-02	Blast Cabinet 2A
EU0020	EP-02	Blast Cabinet 2B
EU0050	EP-03	Three (3) Thirty (30)-Gallon Safety Kleen Parts Washers
EU0060	EP-02	Grit Blast Room 2E (#274)
EU0070	EP-05	Flame Spray Booth 5A
EU0100	EP-01	Three Hundred (300)-Gallon Vapor Degreaser
EU0110	EP-05	Thermal Metal Spraying Unit (5B)
EU0120	EP-05	Thermal Metal Spraying Unit (5C)
EU0130	EP-05	Thermal Metal Spraying Unit (5D)
EU0160	EP-05	Powder spray booth (5L)
EU0180	EP-05	Thermal Metal Spraying Unit (5G)
EU0190	EP-05	Thermal Metal Spraying Unit (5I)
EU0200	EP-05	Thermal Metal Spraying Unit (5K)
EU0210	EP-05	Thermal Metal Spraying Unit (5N)
EU0220	EP-05	Thermal Metal Spraying Unit (5O)
EU0230	EP-11	Space and Water Heaters
EU0250	EP-05	Thermal Metal Spraying Unit (5P)

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Three (3) small glove-box blast cabinets with self-contained vacuum collection system
 Radiant heaters - Natural gas-fired, 0.82 MMBtu/hr
 Various space heaters – Natural gas-fired, 1.88 MMBtu/hr

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.

Permit Condition PW001

10 CSR 10-6.065 Operating Permits

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 100 tons of particulate matter with an aerodynamic diameter of less than or equal to ten microns (PM-10) in any consecutive 12-month period.

Monitoring/Record Keeping:

The permittee shall maintain an accurate record of emissions of PM-10 emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the PM-10 emissions from this installation. Example form is attached as Attachment A (Plant-wide Emissions Tracking Record). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the PM-10 emission limitation (less than 100 tons per consecutive 12-month period of PM-10).

Reporting:

The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

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.

EU0010, EU0020 and EU0060 – Abrasive Blast Units			
Emission Unit	Description	Manufacturer/ Model #	2009 EIQ Reference #
EU0010	Blast Cabinet 2A - Parts are blasted with blast grit to roughen parts. Dust created is pulled into the dust collector	Trinity/36	EP-02
EU0020	Blast Cabinet 2B - Parts are blasted with blast grit roughen parts. Dust created is pulled into the dust collector	Empire Abrasive Equip./CAB 3636P-1	
EU0060	Grit Blast Room 2E - Parts are blasted with grit to roughen parts. Dust created is pulled into the dust collector	Hoffman/CPJ44DC	

Permit Condition EU0010-001, EU0020-001 and EU0060-001
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes
10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 032007-006 (Cartridge Filters Requirement)

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 0.55 pounds per hour (lbs/hr) from EU0010, EU0020 and EU0060.
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

Operational Limitation/Equipment Specifications:

St. Louis Metallizing Company shall control emissions from the abrasive blasting operation using cartridge filters as specified in the permit application. The cartridge filters shall be operated and maintained in accordance with the manufacturer's specifications. The cartridge filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the City of St. Louis employees may easily observe them. Replacement cartridges for the cartridge filters shall be kept on hand at all times. The cartridges shall be made of material appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring:

Abrasive blasting shall only occur with the cartridge filters in operation. To insure the proper function of the cartridge filters, the following shall be done:

- 1) The cartridge filters for EU0010 and EU0020 shall be maintained such that the pressure drop remains in the normal operating range (0.75 inches of water to 7.5 inches of water), whenever the emission unit(s) is in operation.
- 2) The cartridge filters for EU0060 shall be maintained such that the pressure drop is in the range 0.2 to ten inches of water weekly. Ten inches of water must not be maintained for longer than two consecutive weeks.
- 3) Check and document the cartridge filters pressure drop weekly. If the pressure drop falls out of the normal operating range, corrective action shall be taken within eight hours to return the pressure drop to normal.
- 4) Inspect every six months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.
- 5) All instruments shall be calibrated, maintained, and operated according to the manufacturer's specifications.
- 6) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented within eight hours.

Recordkeeping:

The permittee shall maintain records to verify compliance with the cartridge filter monitoring. These records shall include weekly cartridge filter pressure drop indicator readings and all dates of filter replacement, and all cartridge filter instrumentation calibrations (see Attachments B-1 and B-2).

Reporting

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the unit(s) deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the operating pressure drop range, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

Permit Condition EU0010-002, EU0020-002 and EU0060-002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
- 2) Exception:
 - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
 - b) 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 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting,

observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

- 2) The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment C-1), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment C-2)

Reporting:

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0050 – Safety Kleen Parts Washers			
Emission Unit	Description	Manufacturer/ Model #	2009 EIQ Reference #
EU0050	Three Safety Kleen parts washers – 30 gallon capacity each	Safety Kleen/250	EP-03

<p>Permit Condition EU0050-001</p> <p>10 CSR 10-5.300</p> <p>Control of Emissions from Solvent Cleaning</p>
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Emission Limitation:

- 1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)).
- 2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The Director and the U.S Environmental Protection Agency (EPA) must approve the alternative method.

Operational Limitation/Equipment Specification:

- 1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 2) When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
 - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
 - b) The solvent is agitated; or
 - c) The solvent is heated.
- 3) Each cold cleaner shall have a internal drainage facility so that parts are enclosed under the cover while draining.
- 4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- 5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices:
 - a) A freeboard ratio of at least 0.75;
 - b) Water cover (solvent must be insoluble in and heavier than water); or
 - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems must receive approval from the Director and EPA prior to their use.
- 8) Each cold cleaner shall be operated as follows:
 - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
 - b) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
 - c) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
 - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down until the leaks are repaired.
 - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the Director and EPA:
 - i) Reduction of the waste material to less than 20% VOC solvent by distillation and proper disposal of the still bottom waste; or

- ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director and EPA.
- f) Waste solvent shall be stored in covered containers only.
- 9) Operators must be trained as follows:
 - a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
 - b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
 - c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment D-3):
 - a) Name and address of the solvent supplier.
 - b) Date of purchase.
 - c) Type of solvent purchased.
 - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment D-1). The record also shall include maintenance and repair logs that occurred on the degreaser (Attachments D-2). These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.
- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment D-4).
- 4) All records shall be retained for five years and be available to the Director upon request.

Reporting:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0100 – Vapor Degreaser		
Emission Unit	Description	2009 EIQ Reference #
EU0100	Open-top vapor degreaser	EP-01

Permit Condition EU0100-001

**10 CSR 10-5.300 Control of Emissions from Solvent Cleaning
10 CSR 10-6.060 Construction Permits Required
St. Louis City ACP Construction Permit No. 06-01-002**

Emission Limitation:

The vapor degreaser (EP1) shall not emit more than 20 tons of VOC during any consecutive 12-month period of time. [Construction Permit No. 06-01-002]

Operational Limitation/Equipment Specification:

- 1) Each open-top vapor degreaser shall have a cover that will prevent the escape of solvent vapors from the degreaser while in the closed position and shall be designed to open and close easily such that minimal disturbing of the solvent vapors in the tank occurs. For covers larger than ten (10) square feet, easy cover use shall be accomplished by either mechanical assistance, such as spring loading or counter weighing or by power systems.
- 2) Each open-top vapor degreaser shall be equipped with a vapor level control device that shuts off the heating source when the vapor level rises above the cooling or condensing coil, or an equivalent safety device approved by the Director and EPA.
- 3) The open-top vapor degreaser with an air/vapor interface over ten and three-fourths (10 3/4) square feet shall be equipped with a refrigerated chiller.
- 4) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
- 5) Each open-top vapor degreaser shall be operated as follows:
 - a) The cover shall be kept closed at all times except when processing workloads through the open-top vapor degreaser, performing maintenance or collecting solvent samples.
 - b) Solvent carry-out shall be minimized in the following ways:
 - i) Parts shall be racked, if practical, to allow full drainage;
 - ii) Parts shall be moved in and out of the open-top vapor degreaser at less than eleven feet (11') per minute;
 - iii) Workload shall remain in the vapor zone at least thirty (30) seconds or until condensation ceases, whichever is longer;
 - iv) Pools of solvent shall be removed from cleaned parts before removing parts from the open-top vapor degreaser freeboard area; and
 - v) Cleaned parts shall be allowed to dry within the open-top vapor degreaser freeboard area for at least fifteen (15) seconds or until visually dry, whichever is longer.
 - c) Porous or absorbent materials such as cloth, leather, wood or rope shall not be degreased.
 - d) If workloads occupy more than half of the open-top vapor degreaser's open-top area, rate of entry and removal shall not exceed five feet (5') per minute.
 - e) Spray shall never extend above vapor level.
 - f) Whenever an open-top vapor degreaser fails to perform within the rule operating requirements, the unit shall be shut down until operation is restored to meet the rule operating requirements.
 - g) Solvent leaks shall be repaired immediately or the open-top vapor degreaser shall be shut down until the leaks are repaired.
 - h) Ventilation exhaust from the open-top vapor degreaser shall not exceed sixty-five (65) cubic feet per minute per square foot of the open-top vapor degreaser open area unless proof is submitted that it is necessary to meet Occupational Safety and Health Administration (OSHA) requirements. Fans shall not be used near the open-top vapor degreaser opening.

- i) Water shall not be visually detectable in solvent exiting the water separator, except for automatic water separators that by configuration do not allow visual inspection.
 - j) Any waste material removed from an open-top vapor degreaser shall be disposed of by one (1) of the following methods or an equivalent method approved by the Director and EPA:
 - i) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or
 - ii) Stored in closed containers for transfer to—
 - (1) A contract reclamation service; or
 - (2) A disposal facility approved by the Director and EPA.
 - k) Waste solvent shall be stored in closed containers only.
- 6) Operators must be trained as follows:
- a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
 - b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
 - c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each (12) months.

Monitoring/Recordkeeping:

- 1) The permittee shall keep monthly records of VOC emissions, including calculated total for every consecutive 12-month period of time. [Construction Permit No. 06-01-002]
- 2) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment D-3):
 - a) Name and address of the solvent supplier.
 - b) Date of purchase.
 - c) Type of solvent purchased.
 - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
- 3) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment D-1). The record also shall include maintenance and repair logs that occurred on the degreaser (Attachments D-2). These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.
- 4) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment D-4).
- 5) All records shall be retained for five years and be available to the Director upon request.

Reporting:

- 1) The permittee shall notify the City of St. Louis Air Pollution Control Program of any change in the vapor degreaser solvent by supplying Material Safety Data Sheet (MSDS) for the new solvent. [Construction Permit No. 06-01-002]
- 2) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, no later than ten days after the end of each month, if the 12-month cumulative total records show that the source exceeded the emission limitations 20 tons of VOC. [Construction Permit No. 06-01-002]
- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU0070, EU0110 through EU0130, EU0160, EU0180 through EU0220, and EU0250 - Thermal Spraying Process			
Thermal spraying operated by melting metal wire or powder and propelling the molten metal onto the part to be sprayed. Operated with cartridge filters and water curtain for PM control			
Emission Unit	Description	Manufacturer/ Model #	2009 EIQ Reference #
EU0070	Flame Spray Booth 5A.	Various spray guns used depending on thermal spray process	EP-05
EU0110	Thermal Metal Spraying Booth 5B		
EU0120	Thermal Metal Spraying Booth 5C		
EU0130	Thermal Metal Spraying Booth 5D		
EU0160	Powder Spray Booth 5L		
EU0180	Molten Metal Spray Booth 5G		
EU0190	Molten Metal Spray Booth 5I		
EU0200	Molten Metal Spray Booth 5K		
EU0210	Molten Metal Spray Booth 5N		
EU0220	Molten Metal Spray Booth 5O		
EU0250	Thermal Metal Spray Booth 5P		

**Permit Condition EU0070-001,
 Permit Condition EU0110-001 through EU0130-001,
 Permit Condition EU0180-001 through EU0220-001, and
 Permit Condition EU0250-001**

**10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit No. 032007-006 (Cartridge Filters Requirement)**

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of:
 - a) 0.21 lbs/hr from EU0070, EU0110, EU0130, EU0160 and EU0250;
 - b) 0.83 lbs/hr from EU0120;
 - c) 0.25 lbs/hr from EU0180 and EU0210;
 - d) 0.22 lbs/hr from EU0190 and EU0220; and
 - e) 0.12 from EU0200.
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

Operational Limitation/Equipment Specifications:

- 1) Flame Spray Booth 5A (EU0070) equipped with a water curtain shall not be operated without the water curtain flow being established.
- 2) St. Louis Metallizing Company shall control emissions from the thermal spraying operation using cartridge filters. The cartridge filters shall be operated and maintained in accordance with the manufacturer's specifications. The cartridge filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such

that the City of St. Louis employees may easily observe them. Replacement cartridges for the cartridge filters shall be kept on hand at all times. The cartridges shall be made of material appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

- 3) Flame Spray Booth 5A (EU0070) equipped with a water curtain shall not be operated without the water curtain flow being established.

Monitoring:

- 1) EU0070 — The permittee shall monitor the water curtains for Flame Spray Booth 5A:
 - a) The water curtain operation shall be inspected for uniform and adequate flow.
 - b) The water curtains shall be inspected each shift, on days of operation, before spraying begins in a booth and after start-up of the water flow.
 - c) The permittee shall maintain records to verify compliance with the water curtain monitoring. These records shall include water flow readings, water curtain inspections and all actions resulting from the inspections.
- 2) EU0110 through EU0130, EU0160, EU0180 through EU0220, and EU0250 — Thermal spraying operation shall only occur with the cartridge filters in operation. To insure the proper function of the cartridge filters, the following shall be done:
 - a) The cartridge filters shall be maintained such that the pressure drop remains in the normal operating range (0.5 inches of water to 7.5 inches of water), whenever the emission unit(s) is in operation.
 - b) Check and document the cartridge filters pressure drop weekly. If the pressure drop falls out of the normal operating range, corrective action shall be taken within eight hours to return the pressure drop to normal.
 - c) Inspect every six months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.
 - d) All instruments shall be calibrated, maintained, and operated according to the manufacturer's specifications.
 - e) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented within eight hours.

Recordkeeping:

- 1) The permittee shall maintain records to verify compliance with the cartridge filter monitoring. These records shall include weekly cartridge filter pressure drop indicator readings, all dates of filter replacement, and all cartridge filter instrumentation calibrations (see Attachments B-1 and B-2).
- 2) The permittee shall maintain records to verify compliance with the water curtain monitoring. These records shall include water flow readings, water curtain inspections and all actions resulting from the inspections. (see Attachments B-3).

Reporting

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten days after the permittee determined that the unit(s) deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the operating pressure drop range, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

**Permit Condition EU0070-002,
Permit Condition EU0110-002 through EU0130-002,
Permit Condition EU0180-002 through EU0220-002, and
Permit Condition EU0250-002**

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

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
- 2) Exception:
 - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
 - b) 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 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment C-1), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment C-2)

Reporting:

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.

- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

**Permit Condition EU0070-003,
Permit Condition EU0110-003 through EU0130-003,
Permit Condition EU0180-003 through EU0220-003, and
Permit Condition EU0250-003**

40 CFR Part 63, Subpart WWWW

National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Emission Limitation/Standards:

Standards and Management Practices [§63.11507]

- 1) The permittee must meet the applicable requirements specified in §63.11507(f)(1), and the applicable management practices in §63.11507(g). [§63.11507(f)]
 - a) For existing permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to water curtain, fabric filter, or HEPA filter, according to §63.11507(f)(1)(i) and (ii). [§63.11507(f)(1)]
 - i) You must operate all capture and control devices according to the manufacturer's specifications and instructions. [§63.11507(f)(1)(i)]
 - ii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11507(f)(1)(ii)]
 - b) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable. [§63.11507(g)(9)]

Monitoring/Compliance Requirements:

- 1) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times. [§63.11508(b)]
- 2) To demonstrate initial compliance, you must satisfy the requirements specified in §63.11508(c)(9). [§63.11508(c)]
 - a) If you own or operate an existing affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(f)(1), "What are my standards and management practices?", you must demonstrate initial compliance according to §63.11508(c)(9)(i) through (iii). [§63.11508(c)(9)]
 - i) You must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water curtain, fabric filter, or HEPA filter. [§63.11508(c)(9)(i)]
 - ii) You must state in your Notification of Compliance Status that you have installed and are operating the control system according to the manufacturer's specifications and instructions. [§63.11508(c)(9)(ii)]
 - iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11508(c)(9)(iii)]
- 3) To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, you must satisfy the requirements specified in §63.11508(d)(1) through (2). [§63.11508(d)]

- a) You must always operate and maintain your affected source, including air pollution control equipment. [§63.11508(d)(1)]
- b) You must prepare an annual compliance certification according to the requirements specified in §63.11509(c), “Notification, Reporting, and Recordkeeping,” and keep it in a readily-accessible location for inspector review. [§63.11508(d)(2)]

Recordkeeping:

- 1) You must keep the records specified in Paragraphs (e)(1) through (3) of this section. [§63.11509(e)]
 - a) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications. [§63.11509(e)(1)]
 - b) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part. [§63.11509(e)(2)]
 - c) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in §63.11508(d), “What are my compliance requirements?” [§63.11509(e)(3)]
- 2) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining three years. [§63.11509(f)]

Reporting:

- 1) You must submit a Notification of Compliance Status in accordance with §63.11509(b)(1) and (2). [§63.11509(b)]
 - a) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in §63.11506, “What are my compliance dates?” [§63.11509(b)(1)]
 - b) The Notification of Compliance Status must include the items specified in §63.11509(b)(2)(i) through (iv). [§63.11509(b)(2)]
 - i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources. [§63.11509(b)(2)(i)]
 - ii) Methods used to comply with the applicable management practices and equipment standards. [§63.11509(b)(2)(ii)]
 - iii) Description of the capture and emission control systems used to comply with the applicable equipment standards. [§63.11509(b)(2)(iii)]
 - iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements. [§63.11509(b)(2)(iv)]
- 2) You must prepare an annual certification of compliance report according to §63.11509(c)(2) and (7). These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report. [§63.11509(c)]
 - a) For permanent thermal spraying operation that is subject to §63.11507(f)(1) or (2), you must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions. [§63.11509(c)(2)]
 - b) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period. [§63.11509(c)(7)]

- 3) If any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority. [§63.11509(d)]

**Permit Condition EU0070-004,
Permit Condition EU0110-004 through EU0130-004,
Permit Condition EU0180-004 through EU0220-004, and
Permit Condition EU0250-004**

**40 CFR Part 63, Subpart WWWWWW
National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating
and Polishing Operations
– §63.11510 - General Provisions
40 CFR Part 63, Subpart A, General Provisions**

If you own or operate a new or existing affected source, you must comply with the requirements of the General Provisions (40 CFR Part 63, subpart A) according to Table 1 of 40 CFR Part 63, Subpart WWWWWW.

Permit Condition EU0180-005 through EU0220-005

**10 CSR 10-6.060 Construction Permits Required
City of St. Louis APCD Construction Permit No. 02-10-024**

Emission Limitation:

- 1) Spray booth 5G (EU0180) shall comply with the following:
 - a) Operation of the spray gun and booth shall be limited to a maximum of 262,800 pounds of applied product in any consecutive 12-month period.
 - b) Spray booth is limited to a spray gun with a maximum design capacity of 30 pounds/hour or less.
- 2) Spray booth 5I (EU0190) shall comply with the following:
 - a) Operation of the spray gun and booth shall be limited to a maximum of 219,000 pounds of applied product in any consecutive 12-month period.
 - b) Spray booth is limited to a spray gun with a maximum design capacity of 25 pounds/hour or less.
- 3) Spray booth 5K (EU0200) shall comply with the following:
 - a) Operation of the spray gun and booth shall be limited to a maximum of 87,600 pounds of applied product in any consecutive 12-month period.
 - b) Spray booth is limited to a spray gun with a maximum design capacity of 10 pounds/hour or less.
- 4) Spray booth 5N (EU0210) shall comply with the following:
 - a) Operation of the spray gun and booth shall be limited to a maximum of 262,800 pounds of applied product in any consecutive 12-month period.
 - b) Spray booth is limited to a spray gun with a maximum design capacity of 30 pounds/hour or less.
- 5) Spray booth 5O (EU0220) shall comply with the following:
 - a) Operation of the spray gun and booth shall be limited to a maximum of 219,000 pounds of applied product in any consecutive 12-month period.
 - b) Spray booth is limited to a spray gun with a maximum design capacity of 25 pounds/hour or less.

Monitoring/Recordkeeping:

Monthly throughput of applied product for each spray booth shall be recorded, including a calculated total for every consecutive 12-month period (see Attachment E).

Reporting:

The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten days after any deviation from or exceedance of any of the terms of this permit condition.

EU0230 – Space and Water Heaters		
Emission Unit	Description	2009 EIQ Reference #
EU0230	Natural gas-fired space and water heaters (installed in 2001): 11.58 MMBtu/hr make-up air heater 14.46 MMBtu/hr water heater (boiler)	EP-11

<p>Permit Condition EU0230-001</p> <p>10 CSR 10-6.070</p> <p>New Source Performance Regulations</p> <p>40 CFR Part 60 Subpart Dc</p> <p>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</p>
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Record Keeping:

The owner or operator of an affected facility that combusts only natural gas shall record and maintain records of the amount of natural gas combusted during each calendar month. [40 CFR 60.48c(g)(2)]

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 is only an excerpt from the regulation or code, and is provided for summary purposes only

City of St. Louis Ordinance 68657, §16 Open Burning Restrictions

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

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

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

the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(6)(C)3.B]

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

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

10 CSR 10-6.100 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 an 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 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

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

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions

from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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, §(5)(E)2 and §(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, §(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's 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. 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 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)

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(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 semi-annually (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's 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. 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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Joseph P. Stricker, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All

representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources 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) The Missouri Department of Natural Resources 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: Plant-Wide Voluntary Emissions Limit

Plant-Wide Emissions Tracking Record

This is an example of a form that may be used to record data required by Permit Conditions PW001.

- In order to demonstrate compliance with the Permit Condition PW001, St. Louis Metallizing Company must demonstrate the installation emits less than 100 tons of PM-10 in any consecutive 12-month period.

Emission Unit	Month												12-month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
Total													

Note: For thermal spraying operations, the monthly PM-10 emissions are calculated by taking the total material thermal sprayed each month times the emissions rate where the emissions rate is equal to [(100% minus the deposition efficiency) times (100% minus the dust collector capture efficiency)]

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.

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 November 3, 2008, revised January 20, 2011;
- 2) 2009 Emissions Inventory Questionnaire, received May 24, 2010;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) St. Louis City Source Registration for Shot Blast Room, dated July 27, 1988;
- 5) St. Louis City Source Registration for Vapor Degreaser, dated August 3, 1988;
- 6) St. Louis City Source Registration dated August 3, 1988;
- 7) St. Louis City Construction Permit No. 96-02-011A;
- 8) St. Louis City Construction Permit No. 97-07-070;
- 9) St. Louis City Construction Permit No. 97-07-070 Modification dated November 9, 2001;
- 10) St. Louis City Construction Permit No. 00-02-012A;
- 11) St. Louis City Construction Permit No. 01-08-025;
- 12) St. Louis City Construction Permit No. 02-10-024;
- 13) St. Louis City Construction Permit No. 06-02-003; and
- 14) Construction Permit No. 032007-006.

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.

- 1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
10 CSR 10-6.220, *Restriction of Visible Air Contaminants*

10 CSR 10-3.060, *Maximum allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

These rules do not apply to the water heater (boiler) and the make-up air heater identified as part of EP-11 in the 2009 EIQ. The boiler and the air heater are subject to 40 CFR Part 60, subpart Dc (NSPS). Per 10 CSR 10-6.260(1)(A)1., 10 CSR 10-6.220(1)(E) and 10 CSR 10-3.060(3)(E), these rules do not apply to sources subject to the provisions of NSPS.

2) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645

These ordinances were reviewed and considered at the time the application for this permit was submitted. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 68657. The only section of Ordinance 65645 that corresponds to a rescinded ordinance included in the State SIP and therefore federally enforceable is Section 16 - Open Burning Restrictions. This section of the new ordinance is the only section included in the operating permit at this time.

Construction Permit Revisions

1) 10 CSR 10-6.060, *Construction Permits Required*

When a Construction Permit is incorporated into the Operating Permit, all aspects of the Construction Permit relating to emissions are to be maintained for an installation to be in compliance. According to 10 CSR 10-6.060, *Construction Permits Required* the Construction Permit consists of both the issued permit and Construction Permit application.

10 CSR 10-6.060 (6)(E)3. – “Any owner or operator who constructs, modifies or operates an installation not in accordance with the application submitted and the permit issued, including any terms and conditions made a part of the permit, or any owner or operator of an installation who commences construction or modification after May 13, 1982, without meeting the requirements of this rule, is in violation of this rule;”

Any installation that does not comply with the issued permit and Construction Permit application as it relates to emissions would be considered to be in violation of 10 CSR 10-6.060.

The Construction Permit application consists of numerous parameters that are not included in either the Construction Permit or the Operating Permit. Some examples of the criteria necessary for the application are site information; descriptions; plans; control efficiencies; flow parameters; design specifications; and drawings showing the design of the installation, the nature and amount of emission of each pollutant, and the manner in which emission units will be operated and controlled. These values submitted in the Construction Permit application define the criteria the regulatory agencies use to evaluate potential emissions and determine the ambient air quality of the surrounding area. It is essential the installation operate and construct the emission units according to the criteria related to emissions in the Construction Permit application, since the criteria are the basis behind the limitations established in the Construction Permit. If any of the parameters relating to emissions should change, the installation would be required to request and obtain a modification to their Construction Permit.

While an installation must adhere to their Construction Permit application, it is not necessary for the installation to certify and monitor each application parameter to show compliance. The installation is only required to monitor those parameters defined in specific State or Federal requirements or

identified as Special Conditions in the Construction Permit. When construction permits are placed in Plant-wide and Emission Unit permit conditions in the Operating Permit, the installation is required to certify compliance with the parameters (monitoring, performance testing, record keeping and reporting) identified in the Plant-wide and Emission Unit permit conditions of the Operating Permit. However, the various parameters detailed in the Construction Permit application are still applicable to the installation, even though the criteria are not specifically listed in the Operating Permit. Since the entire Construction Permit is not integrated into the Operating Permit, it is necessary to establish that the installation is to operate according to the entire issued Construction Permit and Construction Permit application.

- 2) Construction Permit 032007-006
 - a) The conditions of construction permit 032007-006 supersede all special conditions found in the previously issued construction permit, Permit Number 96-02-011A, from the City of St. Louis Air Pollution Control Program.
 - b) St. Louis Metallizing Company removed or rendered inoperable EU-140 (spray booth 5E) and EU-150 (spray booth 5J) before start up of EU-110 (spray booth 5B), EU-120 (spray booth 5C) and EU-130 (spray booth 5D) according to the requirement of this permit.
- 3) City of St. Louis Construction Permit #97-07-070
Section IV of the construction permit #97-07-070 originally required records to be retained for a minimum of two years. Record keeping specified in Paragraph (6)(C)1.C.(II)(b)I as required by Paragraph (5)(C)1 of 10 CSR 10-6.065, Operating Permits, requires Intermediate sources to retain all records of all required monitoring data and support information for five years. To be in compliance with the construction permit and the Intermediate record retention period, the installation will keep the records for five years.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations*

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

This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

Under Subparts Db and Dc, a steam generating unit is defined as any device which combusts any fuel to produce steam, heat water, or heat any heat transfer medium. Part 60.41b and Part 60.41c define a heat transfer medium as any material used for transferring heat from one point to another point.

Therefore, the water heater (boiler) and the make-up air heater rated at greater than ten MMBtu/hr but less than 100 MMBtu/hr and constructed after the applicability date of this subpart, are subject to this subpart. Under this Subpart, there are no opacity requirements for boilers with heat inputs less than 30 million Btu and there are no particulate or sulfur dioxide standards for these units. The only substantive requirement is that the permittee keep records of the amounts of fuel combusted monthly in these units.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products*

The final rule applies to a facility that owns or operates a miscellaneous metal parts and products surface coating operation that is a major source, or is located at a major source, or is part of a major source of HAP emissions. St. Louis metalizing is not a major source of HAP emissions and therefore not subject to this rule.

40 CFR Part 63, Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*

Each thermal spraying operation that applies one or more of the plating and polishing metal HAP, as defined in §63.11511 of this subpart is subject to this rule.

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The cleaning solvents covered by the MACT standard are solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than five percent by weight, as a cleaning and/or drying agent.

The installation operates cold cleaners and open top vapor degreasers that use non halogenated solvent as the cleaning solvent. Therefore, the installation is not subject to 40 CFR Part 63, Subpart T.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

Other Regulatory Determinations

1) 10 CSR 10-6.065(3)(D), *Operating Permits*

The installation operates combustion units of varying size listed in the table below as units without limitation. All of these combustion units emit only combustion products, produce less than one hundred fifty (150) pounds per day of any air contaminant and have a maximum rated capacity of less than ten (10) million British thermal units (Btus) per hour heat input by using exclusively natural gas and/or propane. The APCP has determined that units such as these are not necessary to include in the operating permit.

EIQ Ref. No.	Description	Fuel Type	Maximum Heat Input
EP-11	Radiant Heaters	Natural Gas	0.82 MMBtu/hr
	Various Space Heaters	Natural Gas	1.88 MMBtu/hr

2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight rate material is processed. The installation operates metal spray booths and shot blast station that are subject to 10 CSR 10-6.400 and could be quantified by

the test methods used to determine compliance. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate including particulate emission control equipment. Potentials to emit (PTE) presented below were calculated based on sources Maximum Hourly Design Rate (MHDR).

The permittee is required to monitor the corresponding emission control equipment and adhere to record keeping and reporting requirements. The rationale behind this request is that because the uncontrolled potential emissions are much larger than the corresponding limit. In case of the control equipment failing the installation would very likely emit far in excess of the limit. Periodic monitoring of the equipment will assure its proper working conditions.

Emission Unit #	Emission Unit Name	Maximum Design Rate (ton/hr)	Permitted Rate * (lb/hr)	PM Uncontrolled Emission** (lbs/hr)	Control Efficiency (%)	Controlled PTE (lbs/hr)	Allowable Emissions (lbs/hr)
EU0010	Blast Cabinet 2A	0.05	—	7.50	99	0.075	0.55
EU0020	Blast Cabinet 2B	0.05	—	7.50	99	0.075	0.55
EU0060	Shot Blast Room 2E	0.05	—	7.50	99	0.075	0.55
EU0070	Flame Spray Booth 5A	0.012	—	9.6	99	0.173	0.21
EU0110	Thermal Metal Spraying Unit 5B	0.0122	—	9.6	99	0.096	0.21
EU0120	Thermal Metal Spraying Unit 5C	0.0925	—	4.00	99	0.04	0.82
EU0130	Thermal Metal Spraying Unit 5D	0.0122	—	8.00	99	0.08	0.21
EU0160	Powder Spray Booth 5L	0.012	—	9.60	96	0.004	0.155
EU0180	Thermal Metal Spraying Unit 5G	—	30	9.60	99	0.096	0.25
EU0190	Thermal Metal Spraying Unit 5I	—	25	8.00	99	0.080	0.22
EU0200	Thermal Metal Spraying Unit 5K	—	10	7.20	99	0.072	0.12
EU0210	Thermal Metal Spraying Unit 5N	—	30	7.20	99	0.072	0.25
EU0220	Thermal Metal Spraying Unit 5O	—	25	8.00	99	0.08	0.22
EU0250	Thermal Spray Booth 5P	0.012	—	9.60	99	0.096	0.21

*Permitted hourly spray booth rates (Construction Permit 02-10-024)

** Emission source – Engineering Calculations

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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Berhanu A. Getahun
Environmental Engineer

CERTIFIED MAIL: 70093410000190189527
RETURN RECEIPT REQUESTED

Mr. Joseph P. Stricker
St. Louis Metallizing Company
4123 Sarpy Avenue
St. Louis, MO 63110-1745

Re: St. Louis Metallizing Company, 510-0175
Permit Number: **OP2011-018**

Dear Mr. Stricker:

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.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in 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 do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/bgk

Enclosures

c: City of St. Louis Air Pollution Control Program
PAMS File: 2008-11-003