



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2013-046
Expiration Date: OCT 17 2018
Installation ID: 189-0064
Project Number: 2009-03-053

Installation Name and Address

Sunnen Products Company
7910 Manchester
St. Louis, MO 63143
St. Louis County

Parent Company's Name and Address

Sunnen Products Company
7910 Manchester
St. Louis, MO 63143

Installation Description:

Sunnen Products Company makes machines, tooling and consumable abrasives for machine tool industry customers. The bulk of the facility is dedicated to machining operations: mills, lathes, and grinders. Air emissions sources at the facility include perchlorethylene degreasing, parts washing, adhesive application and cleanup, two emergency generators and natural gas fired low pressure steam boilers for heating.

OCT 18 2013

Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Sunnen Products Company makes machines, tooling and consumable abrasives for machine tool industry customers. The bulk of the facility is dedicated to machining operations: mills, lathes, and grinders. Air emissions sources at the facility include perchlorethylene degreasing, adhesive application and cleanup, parts washing, two emergency generators and natural gas fired low pressure steam boilers for heating.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.09	0.09	0.09	0.09	0.09
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.02	0.02	0.02	0.02	0.02
Sulfur Oxides (SO _x)	---	0.01	0.01	0.07	0.01
Nitrogen Oxides (NO _x)	1.30	1.20	1.20	1.20	1.17
Volatile Organic Compounds(VOC)	5.57	3.88	3.88	5.77	6.75
Carbon Monoxide (CO)	1.09	1.01	1.01	1.01	0.98
Lead (Pb)	---	---	---	---	---
Hazardous Air Pollutants (HAPs)	6.13	2.85	2.85	6.60	3.22
Ammonia (NH ₃)	0.04	0.04	0.04	0.03	0.04

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 #	Description of Emission Unit
EU01	Perchlorethylene Degreasing
EU01a	Batch Vapor Cleaning Machine - Tetrachloroethylene
EU06	Adhesives Application
EU06b	Sizing
EU07	Small Parts Spray Booth
EU10	Generators
EU3	6.7 MMBtu/hr Dual Fuel Boiler

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

6.7 MMBtu/hr Natural Gas Boiler

2.0 MMBtu/hr Natural Gas Boiler

Parts Washers

Adhesive Clean Up Non-Metal

Etching Steel

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 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

- 1) This installation shall not emit more than 99.0 tons of VOC per year on a twelve (12)- month rolling basis.
- 2) This installation shall not emit more than 25 tons of total HAPs per year on a twelve (12)- month rolling basis.
- 3) This installation shall not emit more than 10 tons of an individual HAP per year on a twelve (12)- month rolling basis.

Monitoring/Recordkeeping:

Sunnen Products Company shall maintain monthly records of all VOC and HAP containing materials utilized at the installation on the forms provided (Attachments A, B, C). The forms shall be completed within ten (10) days of the end of each calendar month, maintained on site for the latest sixty (60) month period and made available to the St. Louis County Department of Health personnel or Missouri Department of Natural Resources personnel immediately upon request.

Reporting:

Should records indicate that a violation of any of the limits established by Condition 1, 2 or 3 (above) has occurred, Sunnen Products Company shall notify the St. Louis County Program Manager, 6121 N. Hanley Road, Berkeley, MO 63134, and Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 by no later than the next working day.

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.

EU01 Degreasing	
Emission Unit	Description
EU01	Perchloroethylene Degreasing
EU01a	Batch vapor cleaning machine – tetrachloroethylene

PERMIT CONDITION (EU01 and EU01a)-001

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning

- 1) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the requirements in §63.462(a)(1) or (a)(2):
 - a) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine; or [§63.462(a)(1)]
 - b) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater. §63.462(a)(2)
- 2) Each owner or operator that elects to comply with §63.462(a)(2), shall comply with the work and operational practice requirements specified in paragraphs (c)(1) through (c)(9) of §63.462.
 - a) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. [§63.462(c)(1)]
 - b) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine. [§63.462(c)(2)]
 - c) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining. [§63.462(c)(3)]
 - d) The owner or operator shall ensure that the solvent level does not exceed the fill line. [§63.462(c)(4)]
 - e) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (c)(1) of this section. [§63.462(c)(5)]
 - f) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned. [§63.462(c)(6)]
 - g) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip. [§63.462(c)(7)]
 - h) Except as provided in paragraph (c)(9) of this section, sponges, fabric, wood, and paper products shall not be cleaned. [§63.462(c)(8)]

- i) The prohibition in paragraph (c)(8) of this section does not apply to the cleaning of porous materials that are part of polychlorinated biphenyl (PCB) laden transformers if those transformers are handled throughout the cleaning process and disposed of in compliance with an approved PCB disposal permit issued in accordance with the Toxic Substances Control. [§63.462(c)(9)]
- 3) Each owner or operator of a batch cold cleaning machine shall submit an initial notification report as described in §63.468(a) and (b) and a compliance report as described in §63.468(c).
- 4) Except as provided in §63.464, for all cleaning machines, each owner or operator of a solvent cleaning machine subject to the provisions of this subpart shall ensure that each existing or new batch vapor or in-line solvent cleaning machine conforms to the design requirements specified in paragraphs (a)(1) through (7) of §63.463.
- 5) Except as provided in §63.464, each owner or operator of an existing or new batch vapor cleaning machine shall comply with either paragraph (b)(1) or (b)(2) of §63.463.
- 6) Except as provided in §63.464 for all cleaning machines, each owner or operator of an existing or new batch vapor or in-line solvent cleaning machine shall meet all of the following required work and operational practices specified in paragraphs (d)(1) through (12) of §63.463.
- 7) Each owner or operator of a solvent cleaning machine complying with paragraph (b), (c), (g), or (h) of §63.463 shall comply with the requirements specified in paragraphs (e)(1) through (4) of §63.463.
- 8) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the idling emission limit standards in paragraphs (b)(1)(ii), (b)(2)(ii), (c)(1)(ii) or (c)(2)(ii) of §63.463 shall comply with the requirements specified in paragraphs (f)(1) through (f)(5) of §63.463.
- 9) As an alternative to meeting the requirements in §63.463, each owner or operator of a batch vapor or in-line solvent cleaning machine can elect to comply with the requirements of §63.464(a)(1) or (a)(2).
- 10) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with §63.464(a) shall demonstrate compliance with the applicable three-month rolling average monthly emission limit on a monthly basis as described in §63.465(b) and (c). If the applicable three-month rolling average emission limit is not met, an exceedance has occurred. All exceedances shall be reported as required in §63.468(h).
- 11) Each owner or operator shall comply with the Facility-Wide Standards listed in §63.471:

Solvents emitted	Facility-wide annual emission limits in kg—for general population degreasing machines	Facility-wide annual emission limit in kg for military depot maintenance facilities
PCE only a	4,800	8,000
TCE only	14,100	23,500
MC only	60,000	100,000
Multiple solvents—Calculate the MC-weighted emissions using equation 1	60,000	100,000

Testing Requirements:

The owner or operator shall comply with all testing requirements that apply to the Emission Unit EU01 as described in §63.465.

Monitoring Requirements:

The owner or operator shall comply with all monitoring procedures listed in §63.466 that apply to Emission Unit EU01.

Recordkeeping Requirements:

The owner or operator shall comply with all recordkeeping requirements listed in §63.467 that apply to Emission Unit EU01.

Reporting:

- 1) Each owner or operator is required to submit initial notification to the Administrator as required by §63.468(a) and (b).
- 2) Each owner or operator shall submit reports as required by paragraphs (c), (d), (e), (f), (g) (h), and (i) of §63.468 as applicable.
- 3) Should records indicate that a violation of any of the limits established by Permit Condition EU01-001 has occurred, Sunnen Products Company shall notify the St. Louis County Program Manager, 6121 N. Hanley Road, Berkeley, MO 63134 and Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 by no later than the next working day.

EU06 and EU06b - Adhesive Application and Sizing	
Emission Unit	Description
EU06	Application of Adhesives – bonding ceramic stones to stone holders by applying cement by hand or machine, and bonding the two parts together.
EU06b	Sizing – preparatory step involving spraying cement with pigmented adhesive

PERMIT CONDITION (EU06 & EU06b)-001

10 CSR 10-5.330, Control of Emissions From Industrial Surface Coating Operations

Note: This rule applies to Emission Units EU06 and EU06b when actual emissions for the installation equal or exceed three (3) tons VOC in any 12-month rolling period.

Emission Limitation:

- 1) The following limit applies when actual emissions of VOCs from adhesive application, including cleaning activities equal or exceed three tons per twelve (12)-month rolling period (before consideration of controls):
The permittee may not cause, allow, or permit the discharge into the ambient air of any VOCs in excess of 2.1 pounds of VOC per gallon of coating (minus water and exempt compounds).
- 2) The emission limits of this rule shall be achieved through one of the following:
 - a) VOC content of coatings. Determine the daily volume-weighted average VOC content of all coatings used in an adhesive application process, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds) per subparagraph (5)(C)3.A of this rule. The adhesive application process is in compliance if this value is less than or equal to the emission limits in the table above;
 - b) Combination of VOC content of coatings and add-on controls. Calculate the required control system efficiency per paragraph (5)(C)(4). Of this rule. The adhesive application process is in

- compliance if the actual overall control system efficiency is greater than or equal to the required control system efficiency; or
- c) Control System. If a control system is used to achieve compliance, the overall control system efficiency must be eighty-five (85) percent or greater.
- 3) One or a combination of the following equipment shall be used for adhesive application, unless achieving compliance by using an add-on control device per Subparagraph (3)(K)3.C of this rule.
- a) Electrostatic spray;
 - b) HVLP spray;
 - c) Flow coat;
 - d) Roller coat or hand application, including non-spray application method similar to hand-or mechanical powered caulking gun, brush, or direct hand application;
 - e) Dip coat, including electrodeposition;
 - f) Airless spray;
 - g) Air –assisted airless spray;
 - h) Ink jet technology; and
 - i) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by. HVLP spraying.
- 4) The following work practices must be used to minimize VOC emissions:
- a) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
 - b) Ensure that mixing and storage containers used for VOC-containing coating, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing those materials;
 - c) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;
 - d) Clean up spills immediately;
 - e) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one (1) location to another; and
 - f) Minimize VOC emissions from the cleaning of application, storage, mixing and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Reporting and Recordkeeping:

- 1) The owner or operator of a surface coating unit shall keep records as necessary to determine compliance. Records kept should be appropriate for the facility, their products, and operations. These may include, as applicable, one or more of the following:
- 2) Current list of coatings used and the VOC content as applied;
- 3) Daily volume usage of each coating;
- 4) Records of the weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating VOC content or a combination of coating VOC content and control system;
- 5) Annual VOC emissions from surface coating equipment cleaning; and
- 6) Records such as daily production rates may be substituted for actual daily coating use measurements provided the owner submits a demonstration, approved by the director, that these records are adequate for the purposes of this rule.
- 7) All records shall be retained by the owner or operator for a minimum of five (5) years. These records shall be made available to the director upon request.
- 8) Should records indicate that a violation of any of the limits established by Permit Condition EU02-001 has occurred, Sunnen Products Company shall notify the St. Louis County Program Manager,

6121 N. Hanley Road, Berkeley, MO 63134, and Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, by no later than the next working day.

EU07 – Small Parts Spray Booth	
Emission Unit	Description
EU07	Small Parts Repair Paint Booth

PERMIT CONDITION EU07-001

10 CSR 10-5.330, Control of Emissions From Industrial Surface Coating Operations

Note: This rule applies to Emission Unit EU07- Small Parts Spray Booth when actual emissions for the installation equal or exceed three (3) tons VOC in any 12-month rolling period.

Emission Limitation:

- 1) No owner or operator of a surface coating due to repair or touch up unit may cause, allow or permit the discharge into the ambient air of any VOCs in excess of 3.5 pounds of VOC per gallon of coating (minus water and exempt compounds), when air dried and 3.0 pounds of VOC per gallon of coating (minus water and exempt compounds) when baked.
- 2) The emission limits of this rule shall be achieved through one of the following:
 - a) VOC content of coatings. Determine the daily volume-weighted average VOC content of all coatings used in a surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds) per subparagraph (5)(C)3.A of this rule. . The surface coating unit is in compliance if this value is less than or equal to the emission limits above;
 - b) Combination of VOC content of coatings and add-on controls. Calculate the required control system efficiency per paragraph (5)(C)4. Of this rule. The surface coating unit is in compliance if the actual overall control system efficiency is greater than or equal to the required control system efficiency; or
 - c) Control System. If a control system is used to achieve compliance, the overall control system efficiency must be ninety (90) percent or greater.
- 3) One or a combination of the following equipment shall be used for coating application, unless achieving compliance by using an add-on control device per subparagraph (3)(J)3.C of this rule.
 - a) Electrostatic spray;
 - b) HVLP spray;
 - c) Flow coat;
 - d) Roller coating;
 - e) Dip coat, including electrodeposition;
 - f) Airless spray;
 - g) Air –assisted airless spray;
 - h) Ink jet technology; and
 - i) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
- 4) The following work practices must be used to minimize VOC emissions:
 - a) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
 - b) Ensure that mixing and storage containers used for VOC-containing coating, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing those materials;
 - c) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;
 - d) Clean up spills immediately;

- e) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one (1) location to another; and
- f) Minimize VOC emissions from the cleaning of application, storage, mixing and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Reporting and Recordkeeping:

- 1) The owner or operator of a surface coating unit shall keep records as necessary to determine compliance. Records kept should be appropriate for the facility, their products, and operations. These may include, as applicable, one or more of the following:
 - 2) Current list of coatings used and the VOC content as applied;
 - 3) Daily volume usage of each coating;
 - 4) Records of the weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating VOC content or a combination of coating VOC content and control system;
 - 5) Annual VOC emissions from surface coating equipment cleaning; and
 - 6) Records such as daily production rates may be substituted for actual daily coating use measurements provided the owner submits a demonstration, approved by the director, that these records are adequate for the purposes of this rule.
- 7) All records shall be retained by the owner or operator for a minimum of five (5) years. These records shall be made available to the director upon request.
- 8) Should records indicate that a violation of any of the limits established by Permit Condition EU02-001 has occurred, Sunnen Products Company shall notify the St. Louis County Program Manager, 6121 N. Hanley Road, Berkeley, MO 63134, and Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, by no later than the next working day.

EU10 Generators	
Emission Unit	Description
EU10a	Two (2) ultra low sulfur diesel powered compression ignition, 50 cycle, 75 kW electric generators; installed 1999
EU10b	One (1) natural gas spark ignition, 150 kW generator; installed 2011

PERMIT CONDITION EU10a-001
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR 63 Subpart ZZZZ applicable requirements listed by citation:			
Engine Category	Non-Emergency CI ≤300 HP	Monitoring, Installation, Collection, Operation and Maintenance Requirements	63.6625(e), (h), (i)
Date Constructed	Before 6/12/2006	Initial Compliance	No Requirements
Compliance Date	May 3, 2013	Continuous Compliance	63.6605 63.6640
Emission Limitations	63.6603 Table 2d	Notification Requirements	No Requirements
Operating Limitations	No Requirements	Recordkeeping Requirements	63.6655 (except 63.6655(c) and (f))
Fuel Requirements	No Requirements	Reporting Requirements	No Requirements
Performance Tests	No Requirements	General Provisions (40 CFR Part 63)	Yes, except per 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

Emission Limitations:

Table 2 d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
1. Non-Emergency, non-black start CI stationary RICE ≤300 HP	a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first; ¹ b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

PERMIT CONDITION EU10b-001

10 CSR 10-6.070 New Source Performance Regulations
 40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Emission Limitations:

- 1) The permittee shall comply with the emission standards for the 150 kW natural gas spark ignition generator that are listed in Table 1 of 40 CFR 60 Subpart JJJJ:

Emission Standards					
g/HP-hr			Ppmvd at 15% O ₂		
NO _x	CO	VOC	NO _x	CO	VOC
2.0	4.0	1.0	160	540	86

- 2) The permittee shall comply with all applicable requirements listed in §60.4242 of 40 CFR 60 Subpart JJJJ.

Testing Requirements:

The permittee shall comply with all applicable testing requirements listed in §60.4244.

Reporting/Recordkeeping:

The permittee shall comply with all applicable notification, reporting and recordkeeping requirements in §60.4245.

EU03	
Emission Unit	Description
EU03	6.7 MMBtu/hr Boiler; Primary Fuel natural gas, Secondary Fuel: #2 Fuel Oil; Installed 1963

PERMIT CONDITION EU03-001

10 CSR 10-6.061 Construction Permits Required
Construction Permit #6876, Issued October 17, 2003

Operational Limitation/Equipment Specifications:

The emission unit shall be limited to burning No. 2 Fuel Oil with a sulfur content less than 0.5%.
[Special Condition 1]

Monitoring/Recordkeeping:

1. Sunnen Products shall retain a copy of each #2 oil delivery receipt, which must verify the sulfur content of the fuel by weight. [Special Condition 1]
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU03-002

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

Note: The monitoring and recordkeeping shall only be required when these emission units are burning No. 2 Fuel Oil.

Emission Limitation:

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

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

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit 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 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) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachment D), 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 equipment malfunctions. (see Attachment F)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment E)
4. Attachments D, E and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program, 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, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU03-003

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters

Emission Limitation:

- 1) The permittee shall conduct a tune-up of the boiler biennially as specified in §63.11223. [§63.11201(b)]
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (this can be delayed until the next scheduled unit shut down, but each burner must be inspected at least once every 36 months. [§63.11223(b)(1)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. [§63.11223(b)(3)]
 - d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(4)]
 - e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made. [§63.11223(b)(5)]
 - f) Maintain onsite and submit, if requested by the Administrator, biennial report containing the following information: [§63.11223(b)(6)]
 - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler;
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler; and
 - iii. The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.
 - iv. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.
- 2) The permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements satisfies the energy assessment requirement. The energy assessment must include: [§63.11201(b)]
 - a) A visual inspection of the boiler system;
 - b) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - c) Inventory of major systems consuming energy from affected boiler(s);
 - d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - e) A list of major energy conservation measures;
 - f) A list of the energy savings potential of the energy conservation measures identified; and
 - g) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- 3) The permittee must achieve compliance with the energy assessment requirement no later than March 21, 2014. [§63.11196(a)(3)]
- 4) The general requirements for this subpart are listed in §63.11205.

Reporting:

- 1) The Notification of Compliance Status is due not later than 120 days after the applicable compliance date. The notification must state that the facility has had an energy assessment performed according to §63.11214(c). [§63.11225(a)(4)(i)]

- 2) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified below. You must submit the report by March 15 if you had any instance described by paragraph (c) below. For boilers that are subject only to a requirement to conduct a biennial tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial compliance report instead of a semi-annual compliance report. [§63.11225(b)]
 - a) Company name and address.
 - b) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
 - c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- 3) The permittee must maintain the following records: [§63.11225(c)]
 - a) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
 - b) Records must be kept to document the tune-up of each boiler. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - c) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
 - d) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- 4) The records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). As specified in §63.10(b)(1), and must be kept for 5 years following the date of each recorded action. Each record must be kept onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). Records may be kept off site for the remaining 3 years. [§63.11225(d)]
- 5) If fuels are switched, and this fuel switch may result in the applicability of a different subcategory or a switch out of subpart JJJJJ due to a switch to 100 percent natural gas, the permittee must provide 30 days prior notice of the date upon which you will switch fuels. The notification must identify. [§63.11225(g)]
 - a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice.
 - b) The currently applicable subcategory under this subpart.
 - c) The date on which you became subject to the currently applicable standards.
 - d) The date upon which you will commence the fuel switch.

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Sunnen Products Company may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Sunnen Products Company fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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 10-6.100 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 submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) 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.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

Emission Limitation:

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

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

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

10 CSR 10-6.165 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.

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 recordkeeping 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 Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - 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, recordkeeping, 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 recordkeeping 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, 11201 Renner Blvd., Lenexa, KS 66219, 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 Mike Haughey, Chief Operating Officer. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with the VOC emissions limitations throughout the operating permit.

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

(b)

Note: The maximum potential to emit VOC from the boilers and emer

Column A	Column B (a)	Column C	Column D	Column E
Material Used (Name, Type)	Amount of Material Used (Include Units)	Density (lbs/gal)	VOC Content (Weight %)	VOC Emissions (tons)
(b) Total VOC Emissions Calculated for this Month in Tons:				
(c) 12-Month VOC Emissions Total from Previous Month's Attachment A, in Tons				
(d) Monthly VOC Emissions Total (b) from Previous Year's Attachment A, in Tons				
(e) Current 12-Month Total of VOC Emissions in Tons: [(b) + (c) - (d)]				

Instructions: Choose appropriate VOC calculation method for units reported:

- (a) 1) If usage is in tons: - [Column B] x [Column D] = [Column E]
- 2) If usage is in pounds: - [Column B] x [Column D] x [0.0005] = [Column E]
- 3) If Usage is in gallons: - [Column B] x [Column C] x [Column D] x [0.005] = [Column E]
- (c) Summation of [Column E] in tons
- (d) 12-Month VOC emission total (e) from last month's Attachment A, in tons
- (e) Monthly VOC emissions total (b) from previous year's Attachment A, in tons
- (f) Calculate the new 12-month VOC emissions total. A 12-month VOC emissions total (e) of less than 99 tons indicates compliance

Attachment B

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with the HAP emissions limitations throughout the operating permit.

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

(g)

Copy this sheet as needed

Column A	Column B (a)	Column C	Column D	Column E
Material Used (Name, HAP CAS #)	Amount of Material Used (Include Units)	Density (lbs/gal)	HAP Content (Weight %)	HAP Emissions (tons)
VOC Emissions from fuel combustion (Note: the maximum VOC emissions from fuel combustion (based on 8760 hrs/yr) is 3.76 tons/year . The permittee can enter this amount or calculate actual VOC emissions from combustion sources).				
(b) Total HAP Emissions Calculated for this Month in Tons:				
(c) 12-Month HAP Emissions Total from Previous Month's Attachment B, in Tons				
(d) Monthly HAP Emissions Total (b) from Previous Year's Attachment B, in Tons				
(e) Current 12-Month Total of HAP Emissions in Tons: [(b) + (c) - (d)]				

Instructions: Choose appropriate VOC calculation method for units reported:

- (a) 1) If usage is in tons: - [Column B] x [Column D] = [Column E]
- 2) If usage is in pounds: - [Column B] x [Column D] x [0.0005] = [Column E]
- 3) If Usage is in gallons: - [Column B] x [Column C] x [Column D] x [0.005] = [Column E]
- (h) Summation of [Column E] in tons
- (i) 12-Month HAP emission total (e) from last month's Attachment B, in tons
- (j) Monthly HAP emissions total (b) from previous year's Attachment B, in tons
- (k) Calculate the new 12-month HAP emissions total. A 12-month HAP emissions total (e) of less than 25.0 tons indicates compliance.

Attachment E

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

Readings ranged from _____ to _____ % opacity.

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

STATEMENT OF BASIS

Voluntary Limitations

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

The facility has agreed to a plant-wide VOC limit of 100 tons per year and an individual HAP emissions limit of 10 tons/year and a total HAP emissions limit of 25 tons/year. The permittee must include all emission units, including emission units without limitations and insignificant emission units in the emissions tracking data that must be recorded to demonstrate compliance with these limits.

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 October 13, 2009;
- 2) 2011 Emissions Inventory Questionnaire, received April 27, 2012; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.455, Control of emission from Industrial Solvent Cleaning Operations

This rule does not apply to EU04 Adhesive Clean Up, Non Metal because the emission unit does not emit at least three tons per 12 month rolling period or more of VOC from cleaning operations.

Construction Permit Revisions

Construction Permit #6883, Issued April 4, 2008

This construction permit states that 10 CSR 10-6.220, *Restriction of Emission of Visible Emissions* applies to the fixture adhesive cleaning process, however this process uses a non-VOC solvent for

cleaning purposes which does not produce emissions of particulate matter or any visible emissions, therefore this regulation was not included in the operating permit.

Construction Permit #6876, Issued October 17, 2003

This construction permit states that 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* applies to the dual fuel boiler. However the boiler is actual exempt from this rule because it can be shown that the emissions of sulfur dioxide will not exceed 2.3 lb/MMBtu.

New Source Performance Standards (NSPS) Applicability

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

This subpart does not apply to the two ultra-low sulfur 75 kW electric generators (EU10a) because they were installed in 1999 which is prior to the applicable dates listed in the subpart.

40 CFR Part 60 Subpart JJJJ, *Standards of Performance for Spark Ignition Internal Combustion Engines*

This subpart applies to the 150 kW natural gas generator (EU10b).

40 CFR Part 60 Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971*

This regulation does not apply to the boilers because they do not have a heat input capacity greater than 250 MMBtu/hr.

40 CFR Part 60 Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978*

This regulation does not apply to the boilers because they are not considered Electric Utility Steam Generating Units.

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

This regulation does not apply to the boilers because the maximum heat input rate is less than 100 MMBtu/hr.

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

This regulation does not apply to the boilers because the maximum heat input rate is less than 10 MMBtu/hr.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* applies to this facility

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

This Subpart applies to EU10a, two ultra-low sulfur 75 kW electric generators.

This Subpart does not apply to EU10b, 150 kW natural Gas generator because it is subject to 40 CFR Part 60 Subpart JJJJ and according to §63.6590(c) the unit meets the requirements of Subpart ZZZZ by complying with 40 CFR Part 60 Subpart JJJJ.

40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters*

This Subpart does not apply to the boilers because this facility is not a major source of emissions of Hazardous Air Pollutants.

40 CFR Part 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters*

This Subpart applies to Emission Unit EU03 – Duel Fuel Boiler. It does not apply to the 2.0 MMBtu natural gas boiler or the 6.7 MMBtu natural gas boiler.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)¹
CO	15.3
CO _{2e}	9,935
HAP	Less than 10 (individual) and 25 (total)
NO _x	58.64
PM ₁₀	1.38
PM ₂₅	1.38
SO _x	8.3
VOC	Less than 100

Emissions of HAP are limited to 10 tpy individual and 25 tpy total. VOC is limited to 100 tpy total. The only emission factor with a source of emissions other than HAP or VOC is a small natural gas boiler. The PTE of the facility was calculated assuming this boiler operated 8760 hours per year.

Other Regulatory Determinations

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*

This rule applies to Emission Unit EU06-Adhesives Application when actual emissions equal or exceed three (3) tons VOC in any 12-month rolling period. Because actual emissions may be above or below this threshold depending on production throughout the year, the facility should be prepared

to determine when this rule applies and defend their determination if questioned by Department of Natural Resources' or St. Louis County Health Department personnel.

10 CSR 10-5.300, *Control of Emissions From Solvent Metal Cleaning*

This rule does not apply to the parts washers at this facility. EP-02 Parts Washers was converted to acetone cleaning fluid which is not a VOC. The facility utilizes small containers of Isopropyl Alcohol at individual workstations for small cleanup operations but these containers are less than one gallon and less than one square foot surface area, therefore exempt from the rule according to 10 CSR 10-5.300(1)(D)1.A.

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

EU03 – Duel Fuel Boiler is exempt from the emission limitations of this rule because it can be shown that the emissions of sulfur dioxide will not exceed 2.3 lb/MMBtu from the boiler, based on the following calculation:

MHDR of Boiler: 0.02 Mgal/hr

EF (from FIRE – SCC 10200503): $142 \times s$, where s is the sulfur content of fuel

Maximum Sulfur Content of Fuel (s) from Construction Permit #6876: 0.5%

Maximum Heat Rate Capacity of Boiler: 6.7 MMBtu/hr

Maximum SO₂ emissions = $\{ [142 \times (.5) \text{ lb/Mgal} / \times [0.02 \text{ Mgal/hr}] \} / [6.7 \text{ MMBtu/hr}] = 0.212$ lb/MMBtu, which is less than 2.3 so the boiler is exempt.

10 CSR 10-6.220, *Restriction of Emission of Visible Emissions*

Permit Condition EU03-002 requires monitoring of opacity only when the units are burning fuel oil because the combustion of natural gas does not produce visible emissions in quantities that will violate the opacity standard.

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:

Jill Wade, P.E.
Environmental Engineer

Mr. Mike Haughey
Sunnan Products Company
7910 Manchester
St. Louis, MO 63143

Re: Sunnen Products Company, 189-0064
Permit Number: **OPYYYY-###**

Dear Mr. Haughey:

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 RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Jill Wade at the Department of Natural Resources, 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/jwk

Enclosures

c: St. Louis County Department of Health
St. Louis Regional Office
PAMS File: 2009-03-053