

## INTERMEDIATE STATE PERMIT TO OPERATE

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

**Operating Permit Number:** OP2006-043  
**Expiration Date:** JUL 16 2011  
**Installation ID:** 147-0008  
**Project Number:** 2005-01-043

**Installation Name and Address**

Energizer Battery Manufacturing, Inc.  
3131 East 1<sup>st</sup> Street  
Maryville, MO 64468  
Nodaway County

**Parent Company's Name and Address**

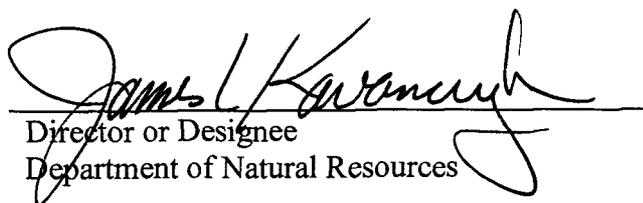
Eveready Battery Co., Inc.  
533 Maryville University Dr.  
St. Louis, MO 63141

**Installation Description:**

Energizer Battery Manufacturing, Inc. is operating an alkaline dry-cell batteries manufacturing plant in Maryville, Missouri. The alkaline dry-cells are manufactured by the successive combination of primary constituents such as manganese dioxide, zinc, graphite, asphalt (sealant), water and other compounds. The plant produces AA, C, 9-volt and lantern batteries.

JUL 17 2006

Effective Date

  
Director or Designee  
Department of Natural Resources

# Table of Contents

## I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING 4

INSTALLATION DESCRIPTION .....	4
EMISSION UNITS WITH LIMITATIONS .....	4
EMISSION UNITS WITHOUT LIMITATIONS .....	5
DOCUMENTS INCORPORATED BY REFERENCE .....	6

## II. PLANT WIDE EMISSION LIMITATIONS 7

Permit Condition PW001 .....	7
VOLUNTARY LIMITATION .....	7
Permit Condition PW002 .....	7
VOLUNTARY LIMITATION .....	7
Permit Condition PW003 .....	8
VOLUNTARY LIMITATION .....	8

## III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS 9

EU0001 through EU0005 –BOILERS .....	9
Permit Condition (EU0001 through EU0005)-001 .....	9
10 CSR 10-6.260 .....	9
Permit Condition (EU0001 through EU0005)-002 .....	10
10 CSR 10-3.060 .....	10
Permit Condition (EU0001 through EU0005)-003 .....	11
10 CSR 10-6.220 .....	11
EU0006 THROUGH EU0009 –EMERGENCY GENERATORS .....	12
Permit Condition (EU0006 through EU0009)-001 .....	12
10 CSR 10-6.260 .....	12
10 CSR 10-6.060 <i>Construction Permits Required</i> .....	12
<b>Permit Number 062002-010 (for EU0007)</b> .....	12
EU0010 THROUGH EU0018 – CATHODE MOLDING PROCESSES .....	14
Permit Condition (EU0010 through EU0018)-001 .....	14
10 CSR 10-6.400 .....	14
<b>Control of Emission of Particulate Matter From Industrial Processes</b> .....	14
Permit Condition (EU0010 through EU0018)-002 .....	15
10 CSR 10-6.220 .....	15
RESTRICTION OF EMISSION OF VISIBLE AIR CONTAMINANTS .....	15
EU0011 – CATHODE MIX DUST NORTH BATCH ROOM .....	16
Permit Condition EU0011-001 .....	16
10 CSR 10-6.060 <i>Construction Permits Required</i> .....	16
<b>Permit Number 0299-009</b> .....	16
Permit Condition EU0011-002 .....	17
10 CSR 10-6.060 <i>Construction Permits Required</i> .....	17
<b>Permit Number 0693-002</b> .....	17
EU0019 – ANODE MIX BLENDING .....	17
Permit Condition EU0019-001 .....	18
10 CSR 10-6.220 .....	18
RESTRICTION OF EMISSION OF VISIBLE AIR CONTAMINANTS .....	18
Permit Condition EU0019-002 .....	19
10 CSR 10-6.400 .....	19
<b>Control of Emission of Particulate Matter From Industrial Processes</b> .....	19
EU0020 THROUGH EU0021 – PARTS ASSEMBLY .....	20
Permit Condition (EU0020 through EU0021)-001 .....	20
10 CSR 10-6.220 .....	20
RESTRICTION OF EMISSION OF VISIBLE AIR CONTAMINANTS .....	20
Permit Condition (EU0020 through EU0021)-002 .....	21
10 CSR 10-6.400 .....	21
<b>Control of Emission of Particulate Matter From Industrial Processes</b> .....	21
EU0022 – SOUTH ASSEMBLY ASPHALTER .....	22

---

Permit Condition EU0022-001	22
10 CSR 10-6.220.....	22
RESTRICTION OF EMISSION OF VISIBLE AIR CONTAMINANTS.....	22
10 CSR 10-6.060 <i>Construction Permits Required</i> .....	22
Permit Number 1198-015.....	22
<b>IV. CORE PERMIT REQUIREMENTS</b>	<b>24</b>
<b>V. GENERAL PERMIT REQUIREMENTS</b>	<b>30</b>
ATTACHMENT A.....	35
VOC EMISSIONS TRACKING RECORD.....	35
ATTACHMENT B.....	36
AGGREGATE HAP EMISSIONS TRACKING RECORD.....	36
ATTACHMENT C.....	37
INDIVIDUAL HAP EMISSIONS TRACKING RECORD.....	37
ATTACHMENT D.....	38
COMPLIANCE WITH 10 CSR 10-3.060 <i>MAXIMUM ALLOWABLE EMISSION</i> .....	38
OF PARTICULATE MATTER FROM FUEL BURNING EQUIPMENT USED FOR INDIRECT HEATING.....	38
ATTACHMENT E.....	39
METHOD 22 OPACITY EMISSION OBSERVATIONS.....	39
ATTACHMENT F.....	40
INSPECTION/MAINTENANCE/REPAIR/MALFUNCTION LOG.....	40
ATTACHMENT G.....	41
METHOD 9 OPACITY OBSERVATIONS.....	41
ATTACHMENT H.....	42
COMPLIANCE WITH 10 CSR 10-6.400 <i>RESTRICTION OF EMISSION OF</i> .....	42
PARTICULATE MATTER FROM INDUSTRIAL PROCESSES.....	42
ATTACHMENT I.....	43
PROCESS THROUGHPUT FROM CATHODE MIX BLENDING.....	43
<b>STATEMENT OF BASIS</b>	<b>44</b>

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Energizer Battery Manufacturing, Inc. is operating an alkaline dry-cell batteries manufacturing plant in Maryville, Missouri. The alkaline dry-cells are manufactured by the successive combination of primary constituents such as manganese dioxide, zinc, graphite, asphalt (sealant), water and other compounds. The plant produces AA, C, 9-volt and lantern batteries.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2004	0.49	0.04	3.44	33.34	2.85	-	0.29
2003	0.62	0.16	5.75	33.63	2.85	-	0.36
2002	1.74	0.09	5.11	34.40	2.90	-	0.24
2001	1.62	0.10	5.89	31.45	2.94	-	0.52

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	Emission Point Number
EU0001	Boiler No. 2 (Heating)	C-03
EU0002	Boiler No. 1 (Heating)	C-04
EU0003	Boiler (Heating & Humidification)	C-08
EU0004	Boiler (Heating & Humidification)	C-14
EU0005	Boiler (Domestic Hot Water)	C-12
EU0006	BTL Emergency Generator (Diesel)	C-19
EU0007	BTL Emergency Generator (Diesel)	C-20
EU0008	AC Emergency Generator (Diesel) for West Equip. Room	C-21
EU0009	AC Emergency Generator (Diesel) for East Equip. Room	C-22
EU0010	Cathode Mix Dust – North Batch Room Dust Collector No. 4	D-08
EU0011	Cathode Mix Dust – South Batch Room Dust Collector No. 5	D-11
EU0012	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 2	D-02
EU0013	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 3	D-02
EU0014	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 1	D-03
EU0015	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 4	D-03
EU0016	Cathode Mix Reclaim – Desprue Hopper #1 Line 1 & 2	D-06

EU0017	By-Pass for Air Recirculation to Penthouse #4	D-22
EU0018	By-Pass for Air Recirculation to Penthouse #6	D-23
EU0019	Indium Hydroxide Feeder – Anode Room Penthouse	D-15
EU0020	Nail Machine Brass Dust Collector No. 1	D-19
EU0021	Nail Machine Brass Dust Collector No. 2	D-20
EU0022	South Assembly (Asphalt/Naphtha)	F-41

### EMISSION UNITS WITHOUT LIMITATIONS

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

<u>Description of Emission Source</u>	<u>Emission Point Number</u>
General Purpose Fan – AA RC Fume Exhaust	F-13
4A – 2A RC Fume Exhaust	F-14
4A-2A RC Raw Cell (Alcohol/996)	F-15
C/F Raw Cell (Asphalt/Naphtha)	F-20
Lab Hood Fume Exhaust (Burnishing Area)	F-21
Flowable Gel Tank Hold Fume	F-24
Lab Fume Hood Exhaust	F-26
Burnishing	F-28
Cook Waste Water Lab Hood	F-29
Sulfuric Acid Tank	F-30
Bulk KOH Tanks	F-33 & F-34
Wastewater Treatment Tank	F-35
Bulk KOH Storage Tank	F-39
Fugitive Losses	F-42
Diesel Fuel Tank (BTL Generator C-19)	F-43
Bulk HCl Storage Area Vent	F-47
North Subassembly (Asphalt/Naphtha)	F-48
Diesel Fuel Tank (West Equipment Room for Boilers)	F-49
Diesel Fuel Tank (West Equipment Room Under Generator C-21)	F-50
Diesel Fuel Tank (East Equipment room Under Generator C-22)	F-51
Diesel Fuel Tank (BTL Under Generator C-20)	F-52
Building Maintenance – Painting	M-01
Solvent Cleaning – Ethyl Alcohol	M-02
Solvent Cleaning – Isopropyl Alcohol	M-03
Silicone Spray Aerosol	M-05
CRC-3-36 Aerosol	M-06
Solvent Cleaning – Glidsafe	M-07
Water vapor – vacuum system for molding	W-01

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) Construction Permit Number 0693-002
- 2) Construction Permit Number 0796-013A
- 3) Construction Permit Number 0197-020
- 4) Construction Permit Number 1198-015
- 5) Construction Permit Number 0299-09
- 6) Construction Permit Number 062002-010

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

### Permit Condition PW001

#### Voluntary Limitation

##### Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 100 tons of volatile organic compounds (VOC) during any consecutive 12-month period.

##### Monitoring, Recordkeeping:

- 1) The permittee shall maintain an accurate record of emissions of VOC emitted into the atmosphere from this installation. The permittee shall record the monthly VOC emissions with a consecutive 12-month total. The permittee shall use Attachment A (VOC Emissions Tracking Record) or an equivalent form for this purpose.
- 2) The permittee shall maintain these records on site for the most recent 60 months.
- 3) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

##### Reporting:

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 end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 100 tons of VOC emissions.

### Permit Condition PW002

#### Voluntary Limitation

##### Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 25 tons of hazardous air pollutants (HAPs) in aggregate during any consecutive 12-month period.

##### Monitoring, Recordkeeping:

- 1) The permittee shall maintain an accurate record of emissions of aggregate HAPs emitted into the atmosphere from this installation. The permittee shall record the monthly aggregate HAP emissions with a consecutive 12-month total. The permittee shall use Attachment B (Aggregate HAPs Emissions Tracking Record) or an equivalent form for this purpose.
- 2) The permittee shall maintain these records on site for the most recent 60 months.
- 3) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

##### Reporting:

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 end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 25 tons of aggregate HAP emissions.

**Permit Condition PW003**

**Voluntary Limitation**

**Emission Limitation:**

The permittee shall discharge into the atmosphere from the entire installation less than 10 tons of any individual hazardous air pollutant (HAP) during any consecutive 12-month period.

**Monitoring, Recordkeeping:**

- 1) The permittee shall maintain an accurate record of emissions of individual HAPs emitted into the atmosphere from this installation. The permittee shall record the monthly individual HAP emissions with a consecutive 12-month total. The permittee shall use Attachment C (Individual HAPs Emissions Tracking Record) or an equivalent form for this purpose.
- 2) The permittee shall maintain these records on site for the most recent 60 months.
- 3) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

**Reporting:**

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 end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 10 tons of individual HAP emissions.

### III. Emission Unit Specific Emission Limitations

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

<b>EU0001 through EU0005 –BOILERS</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>EIQ Reference #</b>
EU0001	Boiler No. 2 (Heating), Maximum Hourly Design Rate (MHDR) = 16.7 MMBtu/hr	Kewanee/L35-250-10-10.4	C-03
EU0002	Boiler No. 1 (Heating), Maximum Hourly Design Rate (MHDR) = 16.7 MMBtu/hr	Kewanee/L3SW-400-X-16.7	C-04
EU0003	Boiler (Heating & Humidification), Maximum Hourly Design Rate (MHDR) = 10.4 MMBtu/hr	Kewanee/L3SW-400-X-16.7	C-08
EU0004	Boiler (Heating & Humidification), Maximum Hourly Design Rate (MHDR) = 8.4 MMBtu/hr	Cleaver Brooks/CB200X-200	C-14
EU0005	Boiler (Domestic Hot Water), Maximum Hourly Design Rate (MHDR) = 1.2 MMBtu/hr	Columbia/CH-1510	C-12

<p><b>Permit Condition (EU0001 through EU0005)-001</b>          10 CSR 10-6.260          Restriction of Emission of Sulfur Compounds</p>
--

**Emission Limitation:**

- 1) No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.
- 2) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.
- 3) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 µg/m <sup>3</sup> )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 µg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days

**Operational Limitation/Equipment Specifications:**

These boilers shall be limited to burning pipeline grade natural gas or fuel oil no. 2.

**Monitoring/Recordkeeping:**

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

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-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).

<p><b>Permit Condition (EU0001 through EU0005)-002</b></p> <p>10 CSR 10-3.060</p> <p>Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating</p>
---

**Emission Limitation:**

The permittee shall not emit particulate matter in excess of 0.45 pounds per million BTU of heat input.

**Operation Limitation/Equipment Specifications:**

These boilers shall be limited to burning pipeline grade natural gas or fuel oil no. 2.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment D).
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-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 (EU0001 through EU0005)-003**

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.  
[*New source* –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. 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 an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 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.

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 Method 22 observation results (See Attachment E), 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 G).

- 4) Attachments E, F and G contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These 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 determines, 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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

<b>EU0006 through EU0009 –EMERGENCY GENERATORS</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>EQ Reference #</b>
EU0006	BTL Emergency Generator (Diesel), Maximum Hourly Design Rate (MHDR) = 0.30 MMBtu/hr	Onan/86KR-4XR8/854G	C-19
EU0007	BTL Emergency Generator (Diesel), Maximum Hourly Design Rate (MHDR) = 0.882 MMBtu/hr	Generac Power System/2484860100	C-20
EU0008	AC Emergency Generator (Diesel) for West Equip. Room, Maximum Hourly Design Rate (MHDR) = 0.30 MMBtu/hr	Cummins/Katolight D60FRJU	C-21
EU0009	AC Emergency Generator (Diesel) for East Equip. Room, Maximum Hourly Design Rate (MHDR) = 0.0846 MMBtu/hr	Cummins/Katolight D60FRJU	C-22

<b>Permit Condition (EU0006 through EU0009)-001</b>
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds 10 CSR 10-6.060 <i>Construction Permits Required</i> <b>Permit Number 062002-010 (for EU0007)</b>

**Emission Limitation:**

- 1) Emissions from any existing or new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three-hour time period.
- 3) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 µg/m <sup>3</sup> )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 µg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days

**Operational Limitation/Equipment Specifications:**

The emission unit shall be limited to burning number 2 fuel oil.

**Monitoring/Recordkeeping:**

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

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-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).

<b>EU0010 through EU0018 – CATHODE MOLDING PROCESSES</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>EIQ Reference #</b>
EU0010	Cathode Mix Dust – North Batch Room Dust Collector No. 4	Unknown	D-08
EU0011	Cathode Mix Dust – North Batch Room Dust Collector No. 5	Unknown	D-11
EU0012	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 2	Unknown	D-02
EU0013	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 3	Unknown	D-02
EU0014	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 1	Unknown	D-03
EU0015	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 4	Unknown	D-03
EU0016	Cathode Mix Reclaim – Desprue Hopper #1 Line 1 & 2	Unknown	D-06
EU0017	By-Pass for Air Recirculation to Penthouse #4	Unknown	D-22
EU0018	By-Pass for Air Recirculation to Penthouse #6	Unknown	D-23

<p><b>Permit Condition (EU0010 through EU0018)-001</b>          10 CSR 10-6.400  <b>Control of Emission of Particulate Matter From Industrial Processes</b></p>
---

**Emission Limitation:**

- 1) Particulate matter shall not be emitted from EU0010 and EU0018 in excess of the emission rates listed in the following table:

<b>Emission Unit</b>	<b>Allowable Emission Rate (lb/hr)</b>
EU0010	<i>Exempt (see Statement of Basis)</i>
EU0011	10.33
EU0012	<i>Exempt (see Statement of Basis)</i>
EU0013	<i>Exempt (see Statement of Basis)</i>
EU0014	<i>Exempt (see Statement of Basis)</i>
EU0015	<i>Exempt (see Statement of Basis)</i>
EU0016	<i>Exempt (see Statement of Basis)</i>
EU0017	<i>Exempt (see Statement of Basis)</i>
EU0018	0.47

- 2) These emission rates were calculated using one of the following equations:

- a) For process weight rates of 60,000 lb/hr or less:

$$E = 4.10(P)^{0.67}$$

Where:

E = rate of emission in lb/hr

P = process weight rate in tons/hr

3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring/Recordkeeping:**

- 1) The permittee shall retain the potential to emit calculations in Attachment H which demonstrate that the above emission limitations will not be exceeded.
- 2) The calculation shall be made available immediately for inspection Department of Natural Resources' personnel upon request.
- 3) All records shall be kept for a period of five years.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-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 (EU0010 through EU0018)-002**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.  
[New source –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. 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 an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 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.

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 Method 22 observation results (See Attachment E), 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 G).
- 4) Attachments E, F and G contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These 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 determines, 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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

<b>EU0011 – CATHODE MIX DUST NORTH BATCH ROOM</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>EQ Reference #</b>
EU0011	Cathode Mix Dust – North Batch Room Dust Collector No. 5	Unknown	D-11

<b>Permit Condition EU0011-001</b> 10 CSR 10-6.060 <i>Construction Permits Required</i> <b>Permit Number 0299-009</b>
---

**Operational Limitation:**

- 1) High Efficiency Fabric Dust Collector No. 5 shall be in use at all times when the associated emission unit is in operation.
- 2) The baghouse shall be operated and maintained in accordance with the manufacturer's specifications.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep maintenance logs for the dust collector, which shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective action.
  - b) Maintenance activities, inspection schedule, repair actions, and replacements, etc.
- 2) These records shall be made available immediately for inspection Department of Natural Resources' personnel upon request.
- 3) All records shall be kept for a period of five years.

**Reporting:**

The permittee shall report any deviations/excursions of this permit condition using the semi-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 EU0011-002**

10 CSR 10-6.060 *Construction Permits Required*

**Permit Number 0693-002**

**Emission Limitation:**

The permittee shall not exceed 4,800 tons of process throughput from EU0011 in any consecutive 12-month period.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an accurate record of emissions process throughput from these units. The permittee shall record the monthly process throughput with a consecutive 12-month total. The permittee shall use Attachment I (Process Throughput from Cathode Mix Blending Process) or an equivalent form for this purpose.
- 2) The permittee shall maintain these records on site for the most recent 60 months.
- 3) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

**Reporting:**

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 end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of 4,800 tons of process throughput.

**EU0019 – ANODE MIX BLENDING**

<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>EIQ Reference #</b>
EU0020	Indium Hydroxide Feeder – Anode Room Penthouse	Unknown	D-15

**Permit Condition EU0019-001**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.  
[*New source* –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. 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 an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 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.

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 Method 22 observation results (See Attachment E), 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 G).
- 4) Attachments E, F and G contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.

6) These 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 determines, 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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

**Permit Condition EU0019-002**

10 CSR 10-6.400

**Control of Emission of Particulate Matter From Industrial Processes**

**Emission Limitation:**

- 1) Particulate matter shall not be emitted from and EU0019 in excess of 0.04 lb/hr.
- 2) This emission rate was calculated using one of the following equations:
  - a) For process weight rates of 60,000 lb/hr or less:

$$E = 4.10(P)^{0.67}$$

Where:

E = rate of emission in lb/hr

P = process weight rate in tons/hr

- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring/Recordkeeping:**

- 1) The permittee shall retain the potential to emit calculations in Attachment H which demonstrate that the above emission limitations will not be exceeded.
- 2) The calculation shall be made available immediately for inspection Department of Natural Resources' personnel upon request.
- 3) All records shall be kept for a period of five years.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-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).

<b>EU0020 through EU0021 – PARTS ASSEMBLY</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>EQ Reference #</b>
EU0020	Nail Machine Brass Dust Collector No. 1	Unknown	D-19
EU0021	Nail Machine Brass Dust Collector No. 2	Unknown	D-20

<p align="center"><b>Permit Condition (EU0020 through EU0021)-001</b></p> <p>10 CSR 10-6.220</p> <p><b>Restriction of Emission of Visible Air Contaminants</b></p>
--

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.  
[New source –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. 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 an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 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.

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 Method 22 observation results (See Attachment E), 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 G).

- 4) Attachments E, F and G contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These 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 determines, 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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

**Permit Condition (EU0020 through EU0021)-002**

10 CSR 10-6.400

**Control of Emission of Particulate Matter From Industrial Processes**

**Emission Limitation:**

- 1) Particulate matter shall not be emitted from EU0020 and EU0021 individually in excess of 3.14 lb/hr.
- 2) These emission rates were calculated using one of the following equations:
  - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$
Where:  
E = rate of emission in lb/hr  
P = process weight rate in tons/hr
- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring/Recordkeeping:**

- 1) The permittee shall retain the potential to emit calculations in Attachment H which demonstrate that the above emission limitations will not be exceeded.
- 2) The calculation shall be made available immediately for inspection Department of Natural Resources' personnel upon request.
- 3) All records shall be kept for a period of five years.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-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).

<b>EU0022 – SOUTH ASSEMBLY ASPHALTER</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/ Model #</b>	<b>EQ Reference #</b>
EU0022	South Assembly (Asphalt/Naphtha)	Unknown	F-41

<b>Permit Condition EU0022-001</b>
10 CSR 10-6.220 <b>Restriction of Emission of Visible Air Contaminants</b> 10 CSR 10-6.060 <i>Construction Permits Required</i> <b>Permit Number 1198-015</b>

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.  
[*New source* –any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.]
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit in the table above using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. 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 an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 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.

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 Method 22 observation results (See Attachment E), 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 G).
- 4) Attachments E, F and G contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Missouri Department of Natural Resources personnel upon request.
- 6) These 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 determines, 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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

---

---

## IV. Core Permit Requirements

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

<b>10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions</b>
--

- 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 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

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

### **10 CSR 10-6.150 Circumvention**

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

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

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be

determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-3.030 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such

approval shall not exempt Energizer Battery Manufacturing, Inc. from the provisions of any other law, ordinance or regulation.

- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

#### **10 CSR 10-3.090 Restriction of Emission of Odors**

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. **This requirement is not federally enforceable.**

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

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

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

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

#### **Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I

- substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
- b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with 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.

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*

<b>10 CSR 10-6.280 Compliance Monitoring Usage</b>
--

- 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)(C)1 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, 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 semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, 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, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Mr. Ron Taylor, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be

in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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.

**ATTACHMENT A**  
**VOC Emissions Tracking Record**

Energizer Battery Manufacturing, Inc., Installation ID No. 147-0008

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

<b>Date (month/ year)</b>	<b>Column A Emission Point</b>	<b>Column B Raw Material Usage (gal)</b>	<b>Column C Material Density (lbs/gal)</b>	<b>Column D VOC Content (%)</b>	<b>Column E Monthly VOC Emissions<sup>1</sup> (tons)</b>	<b>Column F Sum of Most Recent 12 months VOC<sup>2</sup> (tons)</b>
Total VOC Emissions for this Month:						
Total VOC Emissions for this Month:						
Total VOC Emissions for this Month:						
Total VOC Emissions for this Month:						

<sup>1</sup> Column E = (Column B) x (Column C) x (Column D) / 2000.

<sup>2</sup> Sum of the last 12 consecutive monthly VOC emissions totals including the current month.

**ATTACHMENT B**  
**Aggregate HAP Emissions Tracking Record**

Energizer Battery Manufacturing, Inc., Installation No. 147-0008

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

<b>Date (month/ year)</b>	<b>Column A Emission Point</b>	<b>Column B Raw Material Usage (gal)</b>	<b>Column C Material Density (lbs/gal)</b>	<b>Column D Total HAP Content (%/100)</b>	<b>Column E Monthly Aggregate HAP Emissions<sup>1</sup> (tons)</b>	<b>Column F Sum of Most Recent 12 months HAP<sup>2</sup> (tons)</b>
	Total Aggregate HAP Emissions for this Month:					
	Total Aggregate HAP Emissions for this Month:					
	Total Aggregate HAP Emissions for this Month:					
	Total Aggregate HAP Emissions for this Month:					

<sup>1</sup> Column E = (Column B) x (Column C) x (Column D) / 2000.

<sup>2</sup> Sum of the last 12 consecutive monthly aggregate HAP emissions totals including the current month.

**ATTACHMENT C**  
**Individual HAP Emissions Tracking Record**

Energizer Battery Manufacturing, Inc., Installation No. 147-0008

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_ for \_\_\_\_\_.  
 (month, year) (month, year) (specify HAP)

<b>Date (month/ year)</b>	<b>Column A Emission Point</b>	<b>Column B Raw Material Usage (gal)</b>	<b>Column C Material Density (lbs/gal)</b>	<b>Column D Ind. HAP Content (%/100)</b>	<b>Column E Monthly Individual HAP Emissions<sup>1</sup> (tons)</b>	<b>Column F Sum of Most Recent 12 months HAP<sup>2</sup> (tons)</b>
	Total Individual HAP Emissions for this Month:					
	Total Individual HAP Emissions for this Month:					
	Total Individual HAP Emissions for this Month:					
	Total Individual HAP Emissions for this Month:					

<sup>1</sup> Column E = (Column B) x (Column C) x (Column D) / 2000.

<sup>2</sup> Sum of the last 12 consecutive monthly individual HAP emissions totals including the current month.

### ATTACHMENT D

#### **Compliance with 10 CSR 10-3.060 Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating**

This attachment may be used to demonstrate compliance with 10 CSR 10-3.060 *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

Emission Limit for EU0010 (existing, i.e. installed by 02/15/1979):

$$0.90 Q^{-0.174} = 0.90 (53.4)^{-0.174} = 0.45 \text{ lb/MMBtu}$$

where Q is the total heat input of all indirect heating sources at the installation.

The following equipment was used to obtain the total heat input (Q) for the above equation:

Equipment	Heat Input (MMBtu/hr)
Boiler No. 2 (Heating) – EU0001	16.7
Boiler No. 1 (Heating) – EU0002	16.7
Boiler (Heating & Humidification) – EU0003	10.4
Boiler (Heating & Humidification) – EU0004	8.4
Boiler (Domestic Hot Water) – EU0005	1.2
<b>TOTAL</b>	<b>53.4</b>

The following table demonstrates compliance with the emission limit:

Emission Unit #	Maximum Hourly Design Rate <sup>1</sup>	PM Emission Factor	Emission Factor Reference	Potential Emission Rate (lb/hr)	Potential Emission Rate (lb/yr)
EU0001 (NG)	0.016 mmft <sup>3</sup> /hr	7.6 lb/mmft <sup>3</sup>	AP-42	0.12	1,065.22
EU0002 (FO#2)	0.122 mgal/hr	2.3 lb/mgal	AP-42	0.28	2,450.06
EU0003 (NG)	0.0099 mmft <sup>3</sup> /hr	7.6 lb/mmft <sup>3</sup>	AP-42	0.08	659.1
EU0004 (FO#2)	0.0759 mgal/hr	2.3 lb/mgal	AP-42	0.17	1,529.23
EU0005 (NG)	0.0011	7.6 lb/mmft <sup>3</sup>	AP-42	3.60 x E-04	73.23
<b>TOTAL</b>					<b>5,776.84</b>

Annual total heat input (Q) = (53.4 MMBtu/hr) X (8760 hr/yr) = 467,784 MMBtu/yr

E<sub>Actual</sub> = (5,776.84 lb/yr) / (467,784 MMBtu/yr) = 0.012 lb/MMBtu

The amount of particulate matter that EU0001 through EU0005 have the potential to emit is less than 2.7% of their allowable emission amount. The boilers are not expected to exceed the allowable limit as long as they burn natural gas or fuel oil #2; therefore, they will be in compliance with this regulation.





### ATTACHMENT G Method 9 Opacity Observations

<b>Company:</b>	<b>Observer:</b>
<b>Location:</b>	<b>Observer Certification Date:</b>
<b>Date:</b>	<b>Emission Unit:</b>
<b>Time:</b>	<b>Control Device:</b>

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	Start	End

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.  
 Was the emission unit in compliance at the time of evaluation?  Yes  No

---

Signature of Observer

**ATTACHMENT H**  
**Compliance with 10 CSR 10-6.400 Restriction of Emission of**  
**Particulate Matter from Industrial Processes.**

This attachment may be used to demonstrate that emission units EU0011 and EU0018 are in compliance with Permit Condition (EU0010 through EU0018)-001, EU0020 is in compliance with Permit Condition EU0020 -002 and EU0021 through EU0022 are in compliance with Permit Condition (EU0021 through EU0022) -002.

This permit condition is based on 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes.*

Emission Unit #	Description	MHDR/ Process Weight Rate (tons/hr)	Emission Factor (lb/ton)	Overall Control Efficiency (%)	<sup>1</sup> Potential PM <sub>10</sub> Emission Rate (lb/hr)	Allowable PM <sub>10</sub> Emission Rate (lb/hr)	In Compliance ?
EU0011	Cathode Mix Dust – North Batch Room Dust Collector No. 5	3.97	0.673	99.0	0.03	10.23	YES
EU0018	By-Pass for Air Recirculation to Penthouse #6	0.039	145	99.8	0.01	0.47	YES
EU0019	Indium Hydroxide Feeder – Anode Room Penthouse	0.001	2000	99.0	0.02	0.04	YES
EU0020	Nail Machine Brass Dust Collector No. 1	0.67	100	99.7	0.20	3.14	YES
EU0021	Nail Machine Brass Dust Collector No. 2	0.67	100	99.7	0.20	3.14	YES

1)  $MHDR \text{ (ton/hr)} * \text{Emission Factor (lb/ton)} * (100 - [\text{Overall Control Efficiency}](\%)) = \text{Potential PM}_{10} \text{ Emission Rate (lb/hr)}$



# STATEMENT OF BASIS

## **Voluntary Limitations**

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

## **Permit Reference Documents**

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

- 1) Intermediate Operating Permit Application, received January 13, 2005;
- 2) 2004 Emissions Inventory Questionnaire, received March 25, 2005;
- 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.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* and 10 CSR 10-6.060 *Construction Permits Required* was applied to EU0022 South Assembly Asphalter. This is because the unit has an existing Construction Permit Number 1198-015 which cites these rules. The operating permit application did not include this requirement.

## **Other Air Regulations Determined Not to Apply to the Operating Permit**

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

- 1) 10 CSR 10-3.080 *Restriction of Emission of Visible Air Contaminants* was included in the previous operating permit. This regulation was rescinded on May 30, 2000 and replaced with 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*, which is included in this permit.
- 2) 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* does not apply to the following sources because of the exemption in Section (B)8 [Note: this section references the exemption in 10 CSR 10-6.061 Section (3)(A)3.A and (3)(A)3.B where the source is specifically exempt if the potential to emit PM<sub>10</sub> is less than 1.0 lb/hr and 876 lb/year (see calculation below):

Emission Unit #	Description	MHDR/ Process Weight Rate (tons/hr)	Emission Factor (lb/ton)	<sup>2</sup> Potential PM <sub>10</sub> Emission Rate (lb/hr)	Potential PM <sub>10</sub> Emission Rate (lb/yr)
EU0010	Cathode Mix Dust – North Batch Room Dust Collector No. 4	3.97	0.02	0.01	834.65
EU0012	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 2	2.35	1.30 xE-03	3.06 x E-03	26.76
EU0013	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 3	2.35	1.30 xE-03	3.06 x E-03	26.76
EU0014	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 1	2.35	1.30 xE-03	3.06 x E-03	26.76
EU0015	Cathode Mix Transfer – Mix Transfer Motivator Collector No. 4	2.35	1.30 xE-03	3.06 x E-03	26.76
EU0016	Cathode Mix Reclaim – Desprue Hopper #1 Line 1 & 2	1.72	3.3 x E-03	5.68 x E-03	49.72
EU0017	By-Pass for Air Recirculation to Penthouse #4	5.80 xE-03	14.1	0.08	716.39

Notes: 1) Although these units are controlled by baghouses with at least 99% overall control efficiency, controls were left out of the equation in order to demonstrate the potential uncontrolled PM<sub>10</sub> emission rates are still within the exemption criteria.

2) Potential PM<sub>10</sub> Emission Rates (PTE) is calculated as follows:

$$\text{PTE (lb/hr)} = \text{MHDR (ton/hr)} * \text{Emission Factor (lb/ton)}$$

$$\text{PTE (lb/yr)} = \text{PTE (lb/hr)} * 8760 \text{ hr/yr}$$

### Construction Permit Revisions

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

none

### New Source Performance Standards Applicability

40 CFR 60 Subpart Dc *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* does not apply to the following units due to the heat input of each is below the applicability threshold of 10 MMBtu/hr:

EU0006	BTL Emergency Generator (Diesel), Maximum Hourly Design Rate (MHDR) = 0.30 MMBtu/hr
EU0007	BTL Emergency Generator (Diesel), Maximum Hourly Design Rate (MHDR) = 0.882 MMBtu/hr
EU0008	AC Emergency Generator (Diesel) for West Equip. Room, Maximum Hourly Design Rate (MHDR) = 0.30 MMBtu/hr
EU0009	AC Emergency Generator (Diesel) for East Equip. Room, Maximum Hourly Design Rate (MHDR) = 0.0846 MMBtu/hr

It follows that if the units are not subject to Subpart Dc, they are also not subject to Subparts Da and Db.

### **Maximum Available Control Technology Applicability**

*none*

### **National Emission Standards for Hazardous Air Pollutants Applicability**

In the permit application and according to ACP 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. No other National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation.

### **Compliance Assurance Monitoring Applicability**

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)* applies to each pollutant-specific emission unit, which meets all of the following criteria:

- 1) Is subject to an emission limitation or standard, and
- 2) Uses a control device to achieve compliance, and
- 3) Has pre-control emissions that exceed or are equivalent to the major source threshold.

The installation meets the exemption criteria under Part 64.2(b)(1)v. because of the emissions caps that have been applied through this permit, thus making the installation a synthetic minor source (or intermediate source). According to EPA, giving each emissions cap "replicable procedures and permit terms that ensure the emissions cap is enforceable" (59 FR 44460, August 29, 1994), it meets the requirements of Part 70.4(b)(12) (and in turn, the exemption criteria of Part 64.2) therefore, additional monitoring in Part 64 would not be appropriate.

### **Other Regulatory Determinations**

*none*

### **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 APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

---

Slawomir Szydio  
Environmental Engineer