Missouri Department of Natural Resources
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2009-002
Expiration Date: 01 - 28 - 2014
Installation ID: 097-0094
Project Number: 2003-10-055

Installation Name and Address
TAMKO Building Products, Inc. (Rangeline Facility)
3000 Newman Rd.
Joplin, MO 64802
Jasper County

Parent Company's Name and Address
TAMKO Building Products, Inc.
P.O. Box 1404
Joplin, MO 64802

Installation Description:
TAMKO Building Products, Inc. (Rangeline Facility) manufactures roofing products and includes such processes and products as felt mat, glass mat, asphalt coatings and saturants. The operations at the installation are divided into four main manufacturing operations: Refinery Operations, Fiberglass Mat Manufacturing Operations, Felt Mill No. 1 Operations and Felt Mill No. 2 Operations.

JAN 29 2009
Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

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Paper felt production (Felt Mill No. 1 and No. 2 Operations)
This manufacturing process consists of combining recycled paper and/or cardboard, saw dust or agricultural/natural fibers, fiberglass strands, and water to create a wet slurry. These products are placed into a hydropulper with process water and additives. The pulp is then pumped into a forming cylinder and a series of presses. The wet form is then passed over a series of steam rolls as heated air is blown through the dryer section. The temperature of the paper at the first roll in the dryer is approximately ninety degrees Fahrenheit and is approximately 260 degrees Fahrenheit by the last roll. The length and time the paper is heated and dried ranges from two to eight minutes depending on the thickness of the paper being produced. The dried paper felt is then fed through the felt winder and slitter.

Fiberglass Mat production
The Fiberglass Mat Manufacturing Operations include the wet-forming manufacturing process designed to form fibers of fiberglass into a mat to be used in various products. This process begins with the preparation of glass fibers by dumping fiberglass fiber into one of the two mixing tanks filled with water and certain additives to modify the whitewater properties. The mixture is agitated with large mixers, pumped to a machine chest, and then to a head box. The mixture overflows on a wire section forming a loose glass mat. The excess water is vacuumed from the loose mat. The loose mat is saturated with urea-formaldehyde binder solution and cured in the dryer. The mat is then cooled down, trimmed, cut into desired widths, wound into rolls, and then packaged.

Refinery Operations
This is the preparation of asphalt flux. This preparation, called “Blowing”, involves the oxidation of asphalt flux by bubbling air through liquid asphalt flux in blowing stills. Inorganic salts such as ferric chloride ($FECl_3$) may be used as catalysts to achieve desired properties and to increase the rate of reaction in the blowing still. The asphalt flux is received at the railcar/truck unloading stations (EP 3-04 and 3-03). The flux is placed in storage tanks (EP 3-05, EP 3-06, and EP 3-07). The flux is then processed in the blowstills (EP BS-AB1-A, EP BS-AB1-B, EP BS-AB2-A, and EP BS-AB2-B). When the blowing process is complete, the finished product is moved to storage tanks (EP3-08A, EP 3-09A, EP 3-30A, and EP 3-40A) or into tanker trucks. Finished product in the storage tanks is moved to the loading station and then is shipped off site. Emissions from this process are controlled by either the large direct fired thermal oxidizer (DFTO), (EP DFTO-101), or the small direct fired thermal oxidizer unit (EP 3-02, formerly known as East Preheater EP 3-02). The small direct fired thermal oxidizer may operate as an asphalt heater or to control process tank emissions at the same time the large direct fired thermal oxidizer is operating to control emissions.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2006	26.39	65.11	48.95	43.24	81.00	--	3.52
2005	27.70	75.36	43.91	41.08	88.90	--	2.93
2004	23.10	63.02	38.85	35.08	76.78	--	2.64
2003	26.28	70.20	41.33	38.76	83.54	--	5.27
2002	15.25	70.06	50.53	39.32	66.26	--	1.06

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
Natural Gas Fired Boilers	
EU0010	Boiler 1
EU0020	Boiler 2
EU0030	Boiler 4
EU0040	Boiler 5
Fiberglass Plant	
EU0060	Honeycomb Dryer
Felt Mill No. 1	
EU0070	Felt Mill No. 1 Sawdust Holding tank and Feed Bin
EU0080	Felt Mill No. 1 Heaters
Felt Mill No. 2	
EU0090	Felt Mill No. 2 Sawdust Holding tank and Feed Bin
EU0100	Felt Mill No. 2 Heaters
Refinery	
EU0110	Blowstill 34 (BS-AB2-B)
EU0120	Blowstill 35 (BS-AB2-A)
EU0130	Blowstill 36 (BS-AB1-B)
EU0140	Blowstill 37 (BS-AB1-A)
EU0150	Large direct fired thermal oxidizer (DFTO-101)
EU0160	Small direct fired thermal oxidizer Heater (EP 3-02)
EU0170	Asphalt Storage Tank 1 (EP 3-08A)
EU0180	Asphalt Storage Tank 2 (EP 3-09A)
EU0190	Asphalt Storage Tank 3 (EP 3-30A)
EU0200	Asphalt Storage Tank 4 (EP 3-40A)
EU0210	Asphalt Storage Tank 7 (EP 3-05A)
EU0220	Asphalt Storage Tank 8 (EP 3-06)
EU0230	Asphalt Storage Tank 9 (EP 3-07)
EU0240	Heater for Asphalt Storage Tank 1 (EP 3-08)
EU0250	Heater for Asphalt Storage Tank 2 (EP 3-09)
EU0260	Heater for Asphalt Storage Tank 3 (EP 3-30)
EU0270	Heater for Asphalt Storage Tank 4 (EP 3-40)
EU0280	Heater for Asphalt Storage Tank 7 (EP 3-05)

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Fiberglass Plant

Saturator - Excess Water (Vacuum 1 Blower, EP 2-7A)
Saturator - Binder Application (Vacuum 2 Blower, EP 2-7B)
Saturator - Resin Control Vacuum (Vacuum 3 Blower, EP 2-7C)
Delta Former Vacuum - White Water System (EP 2-6A)
Dandy Roll Vacuum - White Water System (EP 2-6B)
Whitewater system, EP 2-10
Two (2) Binder Storage Tanks
Binder Batch Tank
Binder Holding Tank
Binder Seal Tank
Binder Applicator
Fiber Feed Station
North Stock Tank
South Stock Tank
Two (2) Viscosity Modifier Tanks (VMTs)
Machine Chest Tank
Dispersant Tank
Chlorite (ClO_2) Unit
Whitewater Chest
Collection Chest
Winder
Trim Baler
Roof and wall fans
Space Heaters

Felt Mill No. 1

Whitewater system, EP 1-4
Machine Chest Tank
Stock Chest
Whitewater Chest
Save-all Tank
Paper Chest
Two (2) Side-hills
Headbox
Machine's Showers
Rewinder
Roof and Wall fans
Vac Pumps
VAT
Pulper

Felt Mill No. 1, continued
Trim Blower
Space Heaters
Felt Mill No. 2
Whitewater system, EP A-4
Polymer Mix Tank
Clarified Water Chest
Whitewater Chest
Paper Chest
Machine Chest Tank
Recirculation Chest
DAFF
Two (2) Side Hills
Two (2) Pulpers
Machine's Showers
Rewinder
Roof and wall fans
VAT
Trim Blower
Vac Pumps
Space Heaters

Refinery
Truck Asphalt Load Station
Railcar Asphalt Unloading
Truck Asphalt Unloading
Knockout Oil Accumulation Tanks
Space Heaters
Hand Torches

DOCUMENTS INCORPORATED BY REFERENCE
These documents have been incorporated by reference into this permit.
Construction Permit 0496-004

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

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

Emission Limitation:

1. The permittee shall emit less than ten tons per year of hydrogen chloride.
2. The permittee shall emit less than ten tons per year of formaldehyde.

Monitoring:

The permittee shall monitor the emissions of hydrogen chloride and formaldehyde.

Record Keeping:

1. The permittee shall calculate and record the installation-wide emissions of hydrogen chloride and formaldehyde.
2. Attachment E contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
3. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after any exceedance of any limitation established by this permit condition.

III. Emission Unit Specific Emission Limitations

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

EU0010 through EU0050– Boilers			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0010	Boiler 1: 12.075 MMBtu/hr, natural gas fired, installed 1966	Mfr: Continental/ Model# F12C350C	EP-1
EU0020	Boiler 2: 12.075 MMBtu/hr, natural gas fired, installed 1966	Mfr: Continental/ Model# F12C350C	EP-2
EU0030	Boiler 4: 14.65 MMBtu/hr, natural gas fired, installed 1974	Mfr: Continental/ Model# E122B350C	EP-4
EU0040	Boiler 5: 25.20 MMBtu/hr, natural gas fired, installed 1995	Mfr: Hurst/ Model# 200	EP-5

PERMIT CONDITION EU0040-001

10 CSR 10-6.070
New Source Performance Regulations
40 CFR Part 60 Subpart Dc
Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Emission Limitation:
None.

Monitoring/Record Keeping/Reporting:
1. Fuel supplier certification shall include the following information [§60.48c(f)(4)]:
   a) The name of the supplier of the fuel [§60.48c(f)(4)(i)];
   b) The potential sulfur emissions rate of the fuel in ng/J heat input; and [§60.48c(f)(4)(ii)]; and
   c) The method used to determine the potential sulfur emissions rate of the fuel. [§60.48c(f)(4)(iii)].
2. The permittee shall record and maintain records of the amount of each fuel combusted during each operating day, [§60.48c(g)(1)].
3. As an alternative, the permittee of a facility that combusts only natural gas may elect to record and maintain records of the amount of each fuel combusted during each calendar month; [§60.48c(g)(2)]; or
4. The permittee of a facility where the only fuels combusted in any steam generating unit at the property are natural gas, may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month, [§60.48c(g)(3)].

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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU0040-002

10 CSR 10-6.060
Construction Permits Required
Construction Permit 0496-004, Issued on April 2, 1996.

Operational Limitation:
The permittee shall fuel Boiler 5 with natural gas only, [Special Condition 1].

Monitoring/Record Keeping
Fuel certifications shall be kept as specified in Permit Condition EU0040-001.

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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU0040-003, (EU0010 through EU0030)-001

10 CSR 10-3.060
Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:
The permittee shall not emit particulate matter in excess of 0.52 pounds per million British thermal units of heat input for EU0010 and EU0020. The permittee shall not emit particulate matter in excess of 0.29 pounds per million British thermal units of heat input for EU0030 and EU0040.

Operation Limitation/Equipment Specifications:
These emission units shall be limited to burning pipeline grade natural gas.

Monitoring/Record Keeping:
1. The permittee shall maintain on the premises of the installation, calculations demonstrating compliance with this rule. (See Attachment C)
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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU0040-004, (EU0010 through EU0030)-002

10 CSR 10-6.220
Restriction of Emissions 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 **existing** source any visible emissions with an opacity greater than forty percent. This limit applies to EU0010 and EU0020.
2. 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 twenty percent. This limit applies to EU0030 through EU0040.
3. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty minutes air contaminants with an opacity up to sixty percent. This limit applies to EU0010 through EU0040.

Monitoring/Record Keeping/Reporting:

See Core Permit Requirements.

EU0060– Honeycomb Dryer			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0060	Honeycomb Dryer, Installed 1981, MHDR= 3.8 tons/hr and 16 MMBtu/hr natural gas fired heater, controlled by 3.5 MMBtu/hr, Natural Gas fired Regenerative Thermal Oxidizer, installed 2000	Dryer Mfr: Oven Pak, Heater Mfr: Maxon, Model 31792	EP 2-9

PERMIT CONDITION EU0060-001

10 CSR 10-6.220
Restriction of Emissions 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 twenty percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty minutes air contaminants with an opacity up to sixty percent.

Monitoring/Record Keeping/Reporting:

See Core Permit Requirements.

PERMIT CONDITION EU0060-002

10 CSR 10-6.065
Operating Permits

Stack Testing Requirement:

1. The permittee shall perform stack testing to confirm the control efficiency of the Regenerative Thermal Oxidizer used to control emissions from the Honeycomb Dryer.
2. This stack test shall be repeated every five years.
3. This stack test shall be repeated upon replacement of a permanent binder with a higher formaldehyde content.
4. The permittee shall perform stack testing to determine the emission rates of nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC), in order to determine emission factors.

Monitoring:

The permittee shall continuously monitor the temperature of the Regenerative Thermal Oxidizer. The operating temperature of the Regenerative Thermal Oxidizer shall equal or exceed the temperature that is determined during the most recent compliance test.

Reporting:

The permittee shall make stack testing arrangements with the Air Pollution Control Program's Enforcement Section within thirty days of permit issuance.

Felt Mill No. 1 and Felt Mill No. 2 Operations			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0070	Felt Mill No. 1 Sawdust Holding tank and Feed Bin, Installed 1967 controlled by the Wheelabrator Modular Jet III dust collector	Wheelabrator #86 Model 36 WCC Dust Collector	EP1-2
EU0080	Felt Mill No. 1 Heaters, Installed 1990, total MHDR= 12 MMBtu/hr, fueled by Natural Gas	Mfr: Valmet, Model 1500	EP 1-3, 1-4, and 1-5
EU0090	Felt Mill No. 2 Sawdust Holding tank and Feed Bin, Installed 1967 controlled by the Wheelabrator Modular Jet III dust collector	Same control unit as EU0070	EP A-2
EU0100	Felt Mill No. 2 Heaters, Installed 1997, total MHDR=10 MMBtu/hr, fueled by Natural Gas	Mfr: Valmet, Model 80T	EP A-3, A-4, and A-5, A-6

PERMIT CONDITION (EU0070 and EU0090)-001

10 CSR 10-6.400
Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

1. Particulate matter shall not be emitted from EU0070 in excess of 3.36 pounds per hour.
2. The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grains per standard cubic foot.

Monitoring/Record Keeping:

1. The permittee shall retain the potential to emit calculations in Attachment D which demonstrate that the above emission limitations will not be exceeded.
2. The calculation shall be made available immediately for inspection to 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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION (EU0080 and EU0100)-001

10 CSR 10-3.060
Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:
The permittee shall not emit particulate matter in excess of 0.29 pounds per million British thermal units of heat input.

Operation Limitation/Equipment Specifications:
These emission units shall be limited to burning pipeline grade natural gas.

Monitoring/Record Keeping:
1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. (See Attachment C)
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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION (EU0070 through EU0100)-002

10 CSR 10-6.220
Restriction of Emissions 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 **existing** source any visible emissions with an opacity greater than forty percent. This limitation applies to EU0070 and EU0090.
2. 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 twenty percent. This limitation applies to EU0080 and EU0100.
3. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty minutes air contaminants with an opacity up to sixty percent.

Monitoring/Record Keeping/Reporting:
See Core Permit Requirements.

EU0110 through EU0280 Refinery Operations			
Emission Unit	Description	Manufacturer /Model #	2006 EIQ Reference #
EU0110	Blowstill 34; Installed 1993, MHDR=1 ton/hr, controlled by Main DFTO or the Small DFTO	General Steel/893918	BS-AB2-B
EU0120	Blowstill 35; Installed 1993, MHDR=1 ton/hr, controlled by Main DFTO or the Small DFTO	General Steel/933918	BS-AB2-A
EU0130	Blowstill 36; Installed 1990, MHDR=1 ton/hr, controlled by Main DFTO or the Small DFTO	Mfr: General Machinery/Unknown	BS-AB1-B
EU0140	Blowstill 37 , Installed 1990; MHDR=1 ton/hr, controlled by Main DFTO or the Small DFTO.	Mfr: Nueces Model:B5-15	BS-AB1-A
EU0150	Main Direct Fired Thermal Oxidizer (Main DFTO); MHDR= 18 MMBtu/hr natural gas fired, installed 2001; 95% control efficiency	Zeeco	DFTO-101
EU0160	Small DFTO, MHDR=8.37 MMBtu/hr, natural gas fired, installed 1985	Mfr: Red Ray, Model 800	EP 3-02
EU0170	Asphalt Storage Tank 1; installed 1989, 23,000 gallons; controlled by Main DFTO or the Small DFTO	General Steel/876503-1	EP 3-08A
EU0180	Asphalt Storage Tank 2; installed 1989 23,000 gallon; controlled by Main DFTO or the Small DFTO	General Steel/876503-2	EP 3-09A
EU0190	Asphalt Storage Tank 3; installed 2000; 39,250 gallon capacity controlled by Main DFTO or the Small DFTO	Mfr: General Steel/002238-1	EP 3-30A
EU0200	Asphalt Storage Tank 4; installed 2000; 39,250 gallon capacity controlled by Main DFTO or the Small DFTO	Mfr: General Steel/002238-2	EP 3-40A
EU0210	Asphalt Storage Tank 7; installed 1990 189,000 gallon controlled by Main DFTO or the Small DFTO	General Steel/831063-1	EP 3-05A
EU0220	Asphalt Storage Tank 8; installed 1989 169,000 gallon controlled by Main DFTO or the Small DFTO	General Steel/893506	EP 3-06
EU0230	Asphalt Storage Tank 9; installed 1990 189, 000 gallon controlled by Main DFTO or the Small DFTO	General Steel/831063-2	EP 3-07
EU0240	Heater for Asphalt Storage Tank 1; MHDR=0.8 MMBtu/hr; natural gas fired, installed 1987	Mfr: Maxon, Series 67 Tube-O-flamer Gas Burner	EP 3-08
EU0250	Heater for Asphalt Storage Tank 2; MHDR=0.8 MMBtu/hr; natural gas fired, installed 1987	Mfr: Maxon, Series 67 Tube-O-flamer Gas Burner	EP 3-09
EU0260	Heater for Asphalt Storage Tank 3; MHDR=5 MMBtu/hr, natural gas fired, installed 2000	Eclipse ThermJet/TJ500MATN-ZX	EP 3-30
EU0270	Heater for Asphalt Storage Tank 4 MHDR=5 MMBtu/hr, natural gas fired, installed 2000	Eclipse ThermJet/TJ500MATN-ZX	EP 3-40
EU0280	Heater for Asphalt Storage Tank 7; MHDR=5 MMBtu/hr, natural gas fired, installed 1983	Mfr: Maxon, Tube-O-flamer Gas Burner	EP 3-05

PERMIT CONDITION (EU0110 through EU0230)-001

10 CSR 10-6.070-New Source Performance Regulations
40 CFR Part 60 Subpart A-*General Provisions*
40 CFR Part 60 Subpart UU- Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

Emission Limitation:

1. The permittee shall not cause to be discharged into the atmosphere from any blowing still: [§60.472(b)]
   (a) Particulate matter in excess of 0.60 kg/Mg (1.2 pounds per ton) of asphalt charged to the still during blowing without a catalyst; [§60.472(b)(3)];and
   (b) Exhaust gases with an opacity greater than zero percent [§60.472(b)(5)].
2. The permittee shall not cause to be discharged into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than zero percent, except for one consecutive fifteen-minute period in any twenty-four hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this fifteen-minute period, [§60.472(c)].

Monitoring/Record Keeping:

1. The permittee using an afterburner to meet the emission limit in §60.472(b)(1) shall continuously monitor and record the temperature in the combustion zone of the afterburner. The monitoring instrument shall have an accuracy of ±10 degrees Celsius (±18 degrees Fahrenheit) over its range, [§60.473(b)].
2. The permittee is exempted from the quarterly reports required under §60.7(c). The permittee is required to record and report the operating temperature of the control device during the performance test and, as required by §60.7(d), maintain a file of the temperature monitoring results for at least five years, [§60.473(d)].

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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION (EU0160 and EU0240 through EU0280)-002

10 CSR 10-3.060
Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.29 pounds per million British thermal units of heat input from any of these units.

Operation Limitation/Equipment Specifications:

These emission units shall be limited to burning pipeline grade natural gas.

Monitoring/Record Keeping:

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule, (See Attachment C).
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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION (EU0160 and EU0240 through EU0280)-003

10 CSR 10-6.220
Restriction of Emissions 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 twenty percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty minutes air contaminants with an opacity up to sixty percent.

Monitoring/Record Keeping/Reporting:

See Core Permit Requirements.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;

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

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;

i) Measures taken to mitigate the extent and duration of the excess emissions; and
j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than fifteen 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 Section 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(6)(B)1.A(V)]. The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)]. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(6)(C)3.B].

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

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

2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
2) The permittee may be required by the director to file additional reports.
3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
5) The permittee shall be complete required reports on state supplied EIQ forms or in a form satisfactory to the director and shall be submitted to the director by June 1 after the end of each reporting period. Any revision to the EIQ forms will be presented to the regulated community for a forty-five (45)-day comment period.
6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

Emission Limitation:

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

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation. The permittee shall maintain the following monitoring schedule:

1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
2) Should no violation of this regulation be observed during this period then-
   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
   c) Should no violation of this regulation be observed during this period then-
      i) The permittee may observe once per month.
      ii) If a violation is noted, monitoring reverts to weekly.
3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether the visible emissions were normal for the installation.
3) Whether equipment malfunctions contributed to an exceedance.
4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.090, Restriction of Emission of Odors
This requirement is not federally enforceable.

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

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (ten, twenty or forty percent) for the specific emission units.

Monitoring:

1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2) The permittee must maintain the following monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
   b) Should the permittee observe no violations of this regulation during this period then-
      i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
      ii) If a violation is noted, monitoring reverts to weekly.
      iii) Should no violation of this regulation be observed during this period then-
         (1) The permittee may observe once per month.
         (2) If a violation is noted, monitoring reverts to weekly.
3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

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

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

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
f) Owners/operators of appliances normally containing fifty 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*

10 CSR 10-6.280 Compliance Monitoring Usage

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

V. General Permit Requirements

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

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

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

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

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

The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

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

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

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

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

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

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

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

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

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

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None

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

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

to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:

a) The identification of each term or condition of the permit that is the basis of the certification;
b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
c) Whether compliance was continuous or intermittent;
d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
   b) The permit shield shall not apply to these changes.

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

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
d) The permit shield shall not apply to these changes.

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

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment A

Fugitive Emission Observations

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

Attachment B

Opacity Emission Observations

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

ATTACHMENT C

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 existing, units (installed prior to February 24, 1971):

$$0.90\ Q^{-0.174} = 0.90(24.15)^{-0.174} = 0.517 \text{ lb/mmBtu}$$

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

Emission Limit for new, units (installed after 02/24/1971):

$$1.31Q^{-0.338} = 1.31(86.82)^{-0.338} = 0.289 \text{ lb/mmBtu}$$

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

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

EU #	Equipment	New or Existing	Heat Input (MMBtu/hr)
EU0010	Boiler 1	Existing	12.075
EU0020	Boiler 2	Existing	12.075
EU0030	Boiler 4	New	14.65
EU0040	Boiler 5	New	25.20
EU0080	Felt Mill No. 1 heaters	New	12
EU0100	Felt Mill No. 2 heaters	New	10
EU0160	Small DFTO	New	8.37
EU0240	Heater for Asphalt Tank 1	New	0.8
EU0250	Heater for Asphalt Tank 2	New	0.8
EU0260	Heater for Asphalt Tank 3	New	5
EU0270	Heater for Asphalt Tank 4	New	5
EU0280	Heater for Asphalt Tank 7	New	5
	TOTALS	**Existing**	**24.15**
		New	**86.82**

ATTACHMENT C

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*

The following table demonstrates compliance with the emission limit:

Emission Rate (lb/hr) = MHDR*Emission Factor

Emission Unit #	Heat Capacity (MMBtu/hr)	Maximum Hourly Design Rate[1] ($mmft^3$/hr)	PM Emission Factor	Emission Factor Reference	Potential Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0010	12.075	0.012	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.09	6.24
EU0020	12.075	0.012	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.09	6.24
EU0030	14.65	0.014	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.11	4.23
EU0040	25.20	0.025	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.19	7.28
EU0080	12	0.012	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.09	3.47
EU0100	10	0.010	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.07	2.89
EU0160	8.37	0.008	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.06	2.42
EU0240	0.8	0.0001	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.01	0.23
EU0250	0.8	0.001	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.01	0.23
EU0260	5	0.005	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.04	1.45
EU0270	5	0.005	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.04	1.45
EU0280	5	0.005	7.6 $lb/mmft^3$	AP-42 Table 1.4-2	0.04	1.45

[1] Heat capacity divided by heating value of fuel; 1020 $mmBtu/mmft^3$ for natural gas (AP-42, Table 1.4-2)

ATTACHMENT D

This attachment may be used to demonstrate compliance with the limitations of 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* for the equipment listed.

PM Emission limit:

$E = 4.1(P)^{0.67}$ $(P \leq 30)$

$E = 55(P)^{0.11} - 40$ $(P > 30)$

P is process weight rate in tons/hour and E is emission rate limit in lb/hour

Potential PM Emission Rate:

Emission Rate (lb/hr) = Process Weight Rate (ton/hr)*PM Emission Factor (lb/ton)

EU#	Associated Equipment	Process Weight Rate (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor Reference	Potential Uncontrolled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0070	Felt Mill No. 1 Sawdust Holding tank and Feed Bin, controlled by Wheelabrator Modular Jet III dust collector	0.742	2	WebFIRE, SCC 30703002	1.48	3.36
EU0090	Felt Mill No. 2 Sawdust Holding tank and Feed Bin, controlled by Wheelabrator Modular Jet III dust collector	0.742	2	WebFIRE, SCC 30703002	1.48	3.36

ATTACHMENT E

This attachment may be used to demonstrate compliance with the limitations of PW001.

Pollutant monitored: _____ (formaldehyde or hydrogen chloride)

Month	Total emissions (tons/month)	Consecutive 12 month sum of emissions (tons/year)

STATEMENT OF BASIS

Permit Reference Documents

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

1) Part 70 Operating Permit Application, received October 15, 2003, revised August 8, 2005.
2) 2006 Emissions Inventory Questionnaire, received May 31, 2007.
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
4) WebFIRE
5) Construction Permit 0393-012
6) Construction Permit Modification, PAMS project 2260-0094-018
7) Construction Permit 0594-032
8) No Permit Required Letter, PAMS project 2260-0094-020
9) No Permit Required Letter, PAMS project 2260-0094-022
10) No Permit Required Letter, PAMS project 1998-08-040
11) No Permit Required Letter, PAMS project 1999-11-037
12) No Permit Required Letter, PAMS project 2000-05-125
13) No Permit Required Letter, PAMS project 2000-05-148
14) Construction Permit 112000-012
15) No Permit Required Letter, PAMS project 2001-04-112
16) Construction Permit 062001-004
17) No Permit Required Letter, PAMS project 2002-12-121
18) No Permit Required Letter, PAMS project 2004-01-044
19) No Permit Required Letter, PAMS project 2004-10-074
20) No Permit Required Letter, PAMS project 2007-01-021
21) No Permit Required Letter, PAMS project 2007-08-130
22) No Permit Required Letter, PAMS project 2008-02-020

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

None

Construction Permit Review

1. Construction Permit 0393-012
   This permit authorized the replacement of blow still tanks 1 and 4. This permit was rescinded by the Construction Permit Modification, PAMS project 2260-0094-018. Therefore, this construction permit does not appear in this operating permit.
2. Construction Permit Modification, PAMS project 2260-0094-018
   This modification rescinds Construction Permit 0393-012. It was determined that the two asphalt blow stills (EP's 3-1 and 3-2) are like kind replacements for blow stills 1 and 4. This modification does not contain any special conditions. Therefore, this construction permit modification does not appear in the operating permit.
3. Construction Permit 0594-032
   This permit authorized modifications to the existing fiberglass mat line by replacing the gravity feed portion of the machine chest with a pressure feed head box while extending the existing oven hood to increase dwell time. This construction permit does not contain any special conditions, and therefore does not appear in this operating permit.
4. No Permit Required Letter, PAMS project 2260-0094-020
   This letter authorizes the replacement of 75-150 steam dryers with 45-150 steam dryers on Felt Mill No.1. These changes do not trigger any of the permitting requirements in the construction permit rule.
5. Construction Permit 0496-004
   This permit authorizes construction of Boiler 5, a 25.2 million British thermal units per hour natural gas fired boiler. The unit is subject to 40 CFR Part 60 Subpart Dc. The special conditions have been included in the operating permit as follows:
   Special Condition 1: this condition limits the boiler to natural gas combustion fuel. It has been included in the operating permit.
   Special Condition 2: this condition limits the emissions of the boiler to those presented in the special condition. The intent of this condition was to present the potential emissions based on the maximum hourly design rate. Since issuance of this construction permit, the EPA has revised the emission factors that these emission calculations were based on. Therefore, this special condition does not appear in the operating permit.
   Special Condition 3: this condition requires the installation to notify the Air Pollution Control Program in accordance with 40 CFR Part 60 Subpart Dc. Since these are one time requirements that have been satisfied, this condition is not included in the operating permit.
   Special Condition 4: this condition requires the installation to keep records in accordance with 40 CFR Part 60 Subpart Dc. This special condition has not been incorporated in this operating permit because these recordkeeping requirements are presented in the permit condition that contains 40 CFR Part 60 Subpart Dc.
   Special Condition 5: this special condition requires the installation to maintain records for five years. This special condition has not been incorporated into the operating permit because it duplicates the record retention requirements of the operating permit rule.
   Special Condition 6: this special condition contains a ten day reporting requirement for exceedances of the limits established in the construction permit. This special condition has not been incorporated into the operating permit because it duplicates the reporting requirements that are required in operating permit.

6. No Permit Required Letter, PAMS project 22600-094-022
   This letter authorizes installation of the Felt Mill No. 2 dryer and upgrades the Glass Mat Line Vacuum Blower 3. There are five proposed natural gas infra-red burner units that will be installed to the underside of the wet end on Felt Mill No. 2 Dryer section (EPs A-3, A-4, A-5, and A-6). The burners' exhaust through the dryer hood in conjunction with the Felt Mill No. 2 Heater. Each burner is rated at 840,000 British thermal units per hour, with a combined capacity of 4.2 million British thermal units per hour. The upgrade of the Glass Mat Line Vacuum Blower 3 (EP 2-7C) consists of increasing the blower capacity from 2,250 CFM to 2,500 CFM. These changes do not trigger any of the permitting requirements in the construction permit rule.
7. No Permit Required Letter, PAMS project 1998-08-040
   This letter authorizes the testing of a pilot unit for the possible control of formaldehyde emissions from the glass mat production line.
8. No Permit Required Letter, PAMS project 1999-11-037
   This letter authorizes the addition of a baghouse dust collector and the replacement of 2-3,750 CFM fans with 1-6,500 fan on the sawdust handling system. The baghouse is a 10,000 CFM Wheelabrator Modular Jet III dust collector. It will be installed in series downstream of two existing cyclone systems. These systems control emissions from the saw dust storage tanks, EP's 1-2 and A-2. This change does not trigger any of the permitting requirements in the construction permit rule.
9. No Permit Required Letter, PAMS project 2000-05-125
   This letter authorizes the replacement of four horizontal storage tanks (19,000 gallon capacity each) with two vertical storage tanks (39,000 gallon capacity each). Each tank is equipped with an Eclipse TJ Burner System for tank temperature control with a five million British thermal units per hour natural gas fired burner. The initial application (dated May 16, 2000) states that it is the installation's intent to control the storage tanks with a thermal oxidizer. However, in correspondence dated August 2, 2000, the installation requested that to evaluate the potential emissions uncontrolled. The storage tanks are subject to NSPS Subparts Kb and UU. These changes do not trigger any of the permitting requirements of the construction permit rule.
10. No Permit Required Letter, PAMS project 2000-05-148
    This letter authorizes the replacement of the existing eight million British thermal units per hour afterburner with a twelve million British thermal units per hour afterburner. This change does not trigger any of the permitting requirements of the construction permit rule.
11. Construction Permit 112000-012
    This permit authorizes construction of a regenerative thermal oxidizer on the glass mat oven (aka the honeycomb dryer). The regenerative thermal oxidizer has a flow rate of 25,000 standard cubic feet per minute and includes a 3.5 million British thermal units per hour burner that uses natural gas as combustion fuel. This construction permit does not contain any special conditions and therefore does not appear in the operating permit.
12. No Permit Required Letter, PAMS project 2001-04-112
    This letter authorizes the use of particleboard/fiberboard sawdust as a raw material in the felt papermaking process. The particleboard/fiberboard is produced using a urea-formaldehyde based bonding agent. Although formaldehyde emissions increase, they remain below the permitting threshold. Therefore this change does not trigger any of the permitting requirements in the construction permit rule.

13. Construction Permit 062001-004
    This permit authorizes construction of an 18 million British thermal units per hour direct fired thermal oxidizer on the blow stills. This thermal oxidizer is a replacement for an existing eight million British thermal units per hour direct fired thermal oxidizer. Although not mentioned in the construction permit, the applicant also listed a waste heat recovery boiler with this application. This boiler is part of the direct fired thermal oxidizer unit. This permit does not contain any special conditions.
14. No Permit Required Letter, PAMS project 2002-12-121
    This letter authorizes the installation of a new sawdust truck dumping station with retractable seals and hopper with a pneumatic conveying system. The new dumping station is a replacement for an existing station. This new equipment is controlled by the cyclone/baghouse arrangement described in No Permit Required, PAMS project 1999-11-037. This change does not trigger any of the permitting requirements in the construction permit rule.
15. No Permit Required Letter, PAMS project 2004-01-044
    This project re-evaluates the project proposed under No Permit Required, PAMS project 2002-12-121. After installing the system described in that project, the installation discovered that the capture efficiency of the new sawdust dumping station is lower than originally reported. Although emissions from leakage at the dumping station result in higher emission rates than expected, the overall emissions have decreased from the addition of the control device. Therefore, the No Permit Required determination of PAMS project 2002-12-121 is upheld.
16. No Permit Required Letter, PAMS project 2004-10-074
    This letter authorizes the modification of the East Preheater Direct fired thermal oxidizer (EP 3-02). The unit is used as a control device for the asphalt blowstill process and as an auxiliary asphalt heater. The modification consists of extending the burn chamber by four feet, to increase the dwell time of the exhaust fumes from the asphalt blowing process. This modification is not considered a debottlenecking project, and no increase in emissions is expected. Therefore, this change does not trigger any of the permitting requirements in the construction permit rule.
17. No Permit Required Letter, PAMS project 2007-01-021
    This letter authorizes the modification of the large direct fired thermal oxidizer. The modification consists of installing the necessary components to improve the method of the fume line oil. The new method will pump the accumulated fine line oil to atomized nozzles and inject the oil directly into the combustion chamber to increase efficiency. This change does not trigger any of the permitting requirements in the construction permit rule.
18. No Permit Required Letter, PAMS project 2007-08-130
    This letter authorizes the addition of fiberglass strands into the paper roll felt product. The paper roll felt product will be manufactured using recycled paper and/or cardboard, saw dust, and water. The chopped fiberglass strands will be introduced into the wet paper slurry in the early stage of the process. This change does not trigger any of the permitting requirements in the construction permit rule.
19. No Permit Required Letter, PAMS project 2008-02-020
    This letter authorizes the use of agricultural based fibers and other natural fibers as a substitute for saw dust in the felt manufacturing process. The new fiber material does not affect the emissions or production rate of the process. This change does not trigger any of the permitting requirements in the construction permit rule.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart UU- *Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture*

This subpart applies to each saturator and each mineral handling and storage facility at asphalt roofing plants; and each asphalt storage tank and each blowing still at asphalt processing plants, petroleum refineries, and asphalt roofing plants.

This installation is subject to the provisions for asphalt storage tanks and blowing stills. The installation has performed various stack testing in the past, with all the results indicating compliance with the emission standards. For the large direct fired thermal oxidizer (EP DFTO-101), the most recent stack test occurred in January 2003. The results were accepted by the Air Pollution Control Program on September 24, 2003. The results show an average PM emission rate of 0.37 pounds per ton, and a maximum observed opacity of zero percent. This is in compliance with the 1.2 pounds per ton and zero percent opacity standards in the regulation. The testing scenario included the simultaneous operation of two blowstills along with all seven storage tanks.

For the small direct fired thermal oxidizer (EP 3-02), the most recent stack test was conducted on March 29, 2005, with the Air Pollution Control Program accepting the results on December 29, 2005. The results show an average PM emission rate of 0.06 pounds per ton, and a maximum observed opacity of zero percent. This is in compliance with the 1.2 pounds per ton and zero percent opacity standards in the regulation. The testing scenario included the simultaneous operation of two blowstills, all seven storage tanks, and the loading/unloading of trucks and railroad cars.

This regulation requires the installation to keep records for two years. In the permit condition, this was changed to five years to comply with the record keeping requirements of 10 CSR 10-6.065, *Operating Permits.*

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

This subpart applies to each storage vessel with a storage capacity greater than 151,416 liters (40,000 gallons) that is used to store petroleum liquids for which construction is commenced after May 18, 1978. This subpart does not apply to each petroleum liquid storage vessel with a capacity of less than 1,589,873 liters (420,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer.

40 CFR Part 60 Subpart Kb- *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This subpart applies to each storage vessel with a capacity greater than or equal to 75 m3 (~19,813 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m3 (~39,889.98 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m3 but less than 151 m3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa.
The applicability of these regulations is presented in the table below:

EP #	Description	Installation Date	Capacity (gal)	Max true VP (kPa)	Applicability
EP3-8A	Asphalt Storage Tank 1	1989	23,000	2.551	Not subject due to size and VP
EP 3-9A	Asphalt Storage Tank 2	1989	23,000	2.551	Not subject due to size and VP
EP 3-30A	Asphalt Storage Tank 3	2000	39,250	0.861	Not subject due to size and VP
EP 3-40A	Asphalt Storage Tank 4	2000	39,250	0.861	Not subject due to size and VP
EP 3-5A	Asphalt Storage Tank 7	1990	189,000	2.551	Not subject due to size and VP
EP 3-6	Asphalt Storage Tank 8	1989	169,000	2.551	Not subject due to size and VP
EP 3-7	Asphalt Storage Tank 9	1990	189,000	2.551	Not subject due to size and VP

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63 Subpart HHHH: National Emission Standards for Hazardous Air Pollutants For Wet Formed Fiberglass Mat Production

This regulation applies to this production process which is located at a major source of HAPs. This installation is not a major source of HAPs; therefore this regulation does not apply.

40 CFR Part 63 Subpart LLLLL—National Emission Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing

This regulation applies to asphalt processing facilities or asphalt roofing manufacturing facilities, as defined in §63.8698, that is a major source of hazardous air pollutants (HAP) emissions, or is located at, or is part of a major source of HAP emissions.

This installation is not a major source of HAPs; therefore this regulation does not apply

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

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

The CAM regulation exempts units for which an emission limitation or standard for which the Part 70 Operating permit specifies a continuous compliance demonstration method. [see §64.2(b)(1)(vi)].

The only control devices that are used to demonstrate compliance with an emission standard are the thermal oxidizers in the Refinery (EP DFTO and EP 3-02). 40 CFR Part 60 Subpart UU requires continuous monitoring of the temperature of the afterburner. This satisfies the continuous monitoring requirement of §64.2(b)(1)(vi), therefore CAM does not apply.

Other Regulatory Determinations
Removed Equipment:
Boilers:
Boiler 3 was removed from site September 12, 2001. It was replaced by the waste heat recovery boiler. See Construction Permit 062001-004.

Refinery:
Afterburner heater 1 , Red Ray, 800 EP 3-01, 1997 EIQ was removed from site. It was replaced by the large direct fired thermal oxidizer, EP DFTO-101. See Construction Permit 062001-004.

Regulatory Determinations

10 CSR 10-3.060, Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating
This regulation was applied to the Boiler 5, even though it is subject to 40 CFR Part 60 Subpart Dc. Subpart Dc only includes requirements to record and maintain record of amounts of each fuel combusted daily. There is no particulate matter standard to be applied to this unit under Subpart Dc, therefore this rule was applied.

This regulation was not applied to the Fiberglass Honeycomb dryer (EP 2-9) or the Regenerative Thermal Oxidizer (EP 2-9). The products of combustion contact process materials, therefore these units do not meet the definition of indirect heating.

This regulation was applied to the Felt Mill No. 1 and No. 2 Heaters. The steam for the Felt Mill No. 1 and No. 2 dryers is supplied by the boilers, and the heaters are used to heat the outside of the dryers to maintain the temperature of the steam. This satisfies the definition of indirect heating.

This regulation was applied to the Refinery storage tank heaters (EPs 3-05, 3-08, 3-09, 3-30, and 3-40). The provisions of 40 CFR Part 60 Subpart UU only apply to the tanks and blowstills, not the heaters. This regulation was also applied to the Small DFTO (EP 3-02) when it operates as a tank heater. This regulation does not apply to this unit when it is used as a control device.

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
This regulation was applied to the Boiler 5, even though it is subject to 40 CFR Part 60 Subpart Dc. Subpart Dc only includes requirements to record and maintain record of amounts of each fuel combusted daily. There is no opacity standard to be applied to this unit under Subpart Dc, therefore this rule was applied.

This regulation was applied to the Felt Mill No. 1 and No. 2 Heaters because opacity can result from the combustion in the heaters.

This regulation was applied to the Refinery storage tank heaters (EPs 3-05, 3-08, 3-09, 3-30, and 3-40). The opacity provisions of 40 CFR Part 60 Subpart UU only apply to the tanks and blowstills, not the heaters. Opacity can result from the combustion in the heaters.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
This regulation does not apply to the following emission points because they are fired by natural gas, and are therefore exempt per 6.260(1)(A)2.

EP#	Description
EP 1	Boiler 1
EP 2	Boiler 2
EP 4	Boiler 4
EP 5	Boiler 5
EP 2-9	Fiberglass Honeycomb Dryer
EP 2-9	RTO (Regenerative Thermal Oxidizer)
EP 1-3	Felt Mill No. 1 Heaters
EP 1-4	Felt Mill No. 1 Heaters
EP 1-5	Felt Mill No. 1 Heaters
EP A-3	Felt Mill No. 2 Heaters
EP A-4	Felt Mill No. 2 Heaters
EP A-5	Felt Mill No. 2 Heaters
EP3-05	Heater for Asphalt Storage Tank 7
EP 3-08	Heater for Asphalt Storage Tank 1
EP 3-09	Heater for Asphalt Storage Tank 2
EP 3-30	Heater for Asphalt Storage Tank 3
EP 3-40	Heater for Asphalt Storage Tank 4

10 CSR 10-6.400, Restriction of Emission of Particulate Matter from Industrial Processes
This regulation does not apply to the emission points shown in the table for 10 CSR 10-6.260 because they are fired by natural gas, which does not meet the definition of process weight, see 6.400(2)(A).

This regulation does not apply to the Fiberglass Mat line Delta Former Vacuums (EP 2-6A and B) because they have potential emissions of less than 0.5 pounds per hour, and are therefore exempt per 6.400(1)(B)11. The potential emissions of these units are:

Unit Description	MHDR (ton/hr)	PM Emission factor (lb/ton)	PTE PM (lb/hr)
Delta-Former Vacuum (EP 2-6A)	0.033	1	0.033
Delta-Former Vacuum (EP 2-6B)	0.033	1	0.033

Proposed permit conditions: In the operating permit application, the installation proposed the following conditions:

1. Boiler 5
   a) Construction permit 0496-004 authorizes construction of this boiler. The construction permit evaluation relied on emission factors in AP-42. In 1998, the emission factors in AP-42 for natural gas combustion were revised. The installation requests to administratively revise the emissions estimates in the construction permit using the revised emission factors.

      It is not within the authority of the operating permit program to revise emission estimates in a construction permit. Construction permits are evaluated at the time of submittal, using the regulations and emission factors that are in place at that time. The operating permit evaluates emissions based on the submittal date of the operating permit application. If emission factors are revised in AP-42 since the issuance date of a construction permit, the operating permit evaluation uses the revised data. Therefore, the request to modify the construction permit cannot be granted. This operating permit evaluation was based on the emission factors in WebFIRE.

   b) The installation proposes to calculate the maximum potential to emit assuming a heating value for natural gas of 1,000 British thermal units per standard cubic foot.

      As explained in Proposed permit condition 1.a)., the evaluation of this operating permit is based on emission factors in WebFIRE. The emission factors in WebFIRE reference AP-42 Section 1.4-Natural Gas Combustion. According to Section 1.4, the emission factors were developed using a heating value of 1,020 British thermal units per standard cubic foot. If the installation wishes to use a different heating value, monthly records must be kept to document the heating value of the natural gas used on site, and the emission factors used for reporting purposes on the Emissions Inventory Questionnaire would have to be scaled to accurately represent emissions at the different heating value. To avoid burdensome recordkeeping, this request is not granted.

   c) The installation proposes that Boiler 5 be considered a primary boiler for the installation, since Boiler 3 was removed.

      The operating permit does not differentiate primary boilers. The operating permit evaluation is based on the potential emissions of all boilers on site.

   d) The installation proposes that the Construction Permit 0496-004 special conditions be superceded by conditions in the operating permit, and therefore the construction permit should not be incorporated by reference in the operating permit.

      It is not within the authority of the operating permit program to supercede special conditions established in a construction permit. Therefore, this request cannot be granted. However, the special conditions in this construction permit have been modified, see Construction Permit Review section above.

Stack Testing of Regenerative Thermal Oxidizer used to control the Honeycomb Dryer

The installation performed stack testing on June 28, 2001 to determine the formaldehyde destruction efficiency and emission rate from the thermal oxidizer. The test was conducted for the purpose of in-house quality assurance; it was not required by the Air Pollution Control Program. The Air Pollution Control Program was not informed of this test and had no opportunity to review the test plan or observe the actual sampling.

The stack test results were submitted for Enforcement review on August 28, 2007, as part of the technical review of this operating permit. The Air Pollution Control Program's Enforcement

Section reviewed the results and found many discrepancies from standard methodology and procedures. The test report does provide some basis for concluding that the regenerative thermal oxidizer performed with a destruction efficiency of 99.75 percent for formaldehyde during the test. However, the test report contains too many omissions and methodological deficits to be acceptable as a basis for a compliance demonstration. Additionally, it is impossible from the data supplied to assess the current performance of the regenerative thermal oxidizer and the catalyst.

The operating permit review used the control efficiency of 99.75 percent to determine the potential emissions of formaldehyde from this emission unit. According to the installation, they use the regenerative thermal oxidizer control unit for 8,260 hours per year, and operate uncontrolled for 500 hours per year. Using the emission factor (8 lbs formaldehyde/ton), maximum hourly design rate (3.8 tons per hour) and control efficiency (99.75 percent) established by the stack test, this yields a potential to emit of approximately 7.9 tons per year of formaldehyde. Combining these emissions with those of other sources at the installation yields a plant wide PTE of 8.4 tons per year of formaldehyde. This is very close to the 10 tons per year threshold of a major HAP source. Since the destruction efficiency of the control device is crucial in determining potential emissions of formaldehyde, and consequently the applicability of MACT regulations, this operating permit requires the regenerative thermal oxidizer be retested with Air Pollution Control Program oversight. The operating permit also requires this test be repeated every five years, and whenever the catalyst is replaced. The operating permit also requires continuous monitoring of the regenerative thermal oxidizer to ensure that it is operating under the conditions evaluated in the most current stack test.

If the stack test results indicate that the regenerative thermal oxidizer does not operate with at least 92.5 percent control efficiency (for 8,760 hrs of regenerative thermal oxidizer operation) or at least 98.1 percent (for 8,260 hrs of regenerative thermal oxidizer operation), then the applicability of the MACT must be re-evaluated.

Additionally, this permit requires this unit be tested to determine emission rates of NOx, CO, and VOC. During the operating permit review, it was revealed that the installation has been using emission factors from a test performed at another location. This test was reviewed by the Air Pollution Control Program, and it was determined that the tested unit was not similar to the unit at this location, and therefore the emission factors established by the test cannot be used for this unit.

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

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

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

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

Prepared by:

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