



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2010-035
Expiration Date: APR 15 2015
Installation ID: 021-0037
Project Number: 2007-06-017

Installation Name and Address

Albaugh, Inc.
4900 Stockyards Expressway
St. Joseph, MO 64504
Buchanan County

Parent Company's Name and Address

Albaugh, Inc.
1525 NE 36th Street
Ankeny, IA 50021

Installation Description:

Albaugh Inc. is a chemical production plant that manufactures, formulates and repackages a variety of herbicides in St. Joseph, Missouri. Equipment utilized at the installation includes storage and mixing tanks, reaction vessels and other material handling and chemical processing equipment. Most of the operations occur indoors.

The permittee has accepted voluntary, federally enforceable emissions limitations of less than 100 tons per year of VOC emissions, less than 10 tons per year for any individual HAP and less than 25 tons per year for total HAPs in order to qualify for an Intermediate Operating Permit.

APR 16 2010

Effective Date

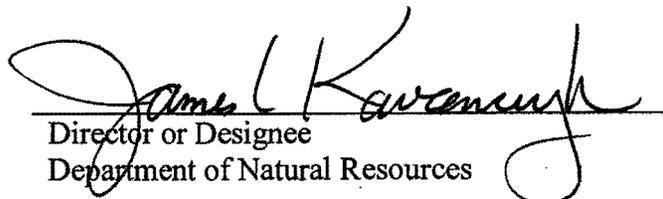

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Albaugh Inc. is a chemical production plant that manufactures, formulates and repackages a variety of herbicides in St. Joseph, Missouri. Equipment utilized at the installation includes storage and mixing tanks, reaction vessels and other material handling and chemical processing equipment. Most of the operations occur indoors.

The permittee has accepted voluntary, federally enforceable emissions limitations of less than 100 tons per year of VOC emissions, less than 10 tons per year for any individual HAP and less than 25 tons per year for total HAPs in order to qualify for an Intermediate Operating Permit.

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)
2008	--	--	--	34.11	--	--	--
2007	--	--	--	32.43	--	--	--
2006	0.02	--	--	27.84	--	--	0.03
2005	0.02	--	--	18.29	--	--	0.01
2004	0.02	--	--	16.27	--	--	0.01

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	2008 EIQ EP #
EU0010	R-6002 - 5,310-gallon Pfaundler reactor	EP-1
EU0020	T-1701 - 19,480-gallon storage tank	EP-119
EU0030	T-1702 - 19,480-gallon storage tank	EP-120
EU0040	T-1703 - 19,480-gallon storage tank	EP-121
EU0050	T-1704 - 19,480-gallon storage tank	EP-122
EU0060	T-1705 - 19,480-gallon storage tank	EP-123
EU0070	T-1709 - 19,480-gallon storage tank	EP-127
EU0080	T-1710 - 19,480-gallon storage tank	EP-128
EU0090	T-1711 - 19,480-gallon storage tank	EP-129
EU0100	R-5302 - 20,880-gallon cooling tank	EP-24
EU0110	T-6002 - 381,760-gallon storage tank	EP-26
EU0120	T-5215 - 12,710-gallon storage tank	EP-22
EU0130	T-7001 - 21,910-gallon storage tank	EP-115
EU0140	T-7002 - 21,910-gallon storage tank	EP-116
EU0150	T-7003 - 21,910-gallon storage tank	EP-117
EU0160	T-7004 - 21,910-gallon storage tank	EP-118
EU0170	T-609 - 3,750-gallon storage tank	EP-106
EU0180	T-611 - 860-gallon storage tank	EP-107
EU0190	T-2306 - 11,930-gallon storage/mixing tank	EP-226

EU0200	T-2307 - 11,930-gallon storage/mixing tank	EP-227
EU0210	T-2556 - 11,930-gallon storage/mixing tank	EP-228
EU0220	T-2557 - 11,930-gallon storage/mixing tank	EP-229
EU0230	T-2201 - 32,280-gallon storage tank	EP-33
EU0240	T-2202 - 32,280-gallon storage tank	EP-34
EU0250	T-2203 - 32,280-gallon storage tank	EP-35
EU0260	T-2204 - 32,280-gallon storage tank	EP-36
EU0270	T-2205 - 32,280-gallon storage tank	EP-37
EU0280	T-2206 - 32,280-gallon storage tank	EP-38
EU0290	T-2207 - 32,280-gallon storage tank	EP-39
EU0300	T-2208 - 32,280-gallon storage tank	EP-40
EU0310	T-2209 - 32,280-gallon storage tank	EP-41
EU0320	T-2210 - 32,280-gallon storage tank	EP-42
EU0330	T-2406 - 23,060-gallon storage tank	EP-79
EU0340	T-2407 - 23,060-gallon storage tank	EP-80
EU0350	T-2408 - 23,060-gallon storage tank	EP-81
EU0360	T-2409 - 23,060-gallon storage tank	EP-82
EU0370	T-2410 - 23,060-gallon storage tank	EP-83
EU0380	T-2411 - 23,060-gallon storage tank	EP-84
EU0390	T-2512 - 27,670-gallon storage tank	EP-155
EU0400	T-2513 - 27,670-gallon storage tank	EP-156
EU0410	T-2515 - 27,670-gallon storage tank	EP-158
EU0420	T-2516 - 27,670-gallon storage tank	EP-159
EU0430	T-2517 - 27,670-gallon storage tank	EP-160
EU0440	T-2518 - 27,670-gallon storage tank	EP-161
EU0450	T-2520 - 27,670-gallon storage tank	EP-163
EU0460	T-2521 - 27,670-gallon storage tank	EP-164
EU0470	T-2522 - 27,670-gallon storage tank	EP-165
EU0480	T-2523 - 27,670-gallon storage tank	EP-166
EU0490	T-2524 - 27,670-gallon storage tank	EP-167
EU0500	T-2525 - 27,670-gallon storage tank	EP-168
EU0510	T-2526 - 27,670-gallon storage tank	EP-169
EU0520	T-2527 - 27,670-gallon storage tank	EP-170
EU0530	T-2536 - 31,770-gallon storage tank	EP-180
EU0540	T-2537 - 31,770-gallon storage tank	EP-181
EU0550	T-2538 - 31,770-gallon storage tank	EP-182
EU0560	T-2539 - 31,770-gallon storage tank	EP-183
EU0570	T-2540 - 31,770-gallon storage tank	EP-184
EU0580	T-2541 - 31,770-gallon storage tank	EP-185
EU0590	T-2542 - 31,770-gallon storage tank	EP-186
EU0600	T-2543 - 31,770-gallon storage tank	EP-187
EU0610	T-2544 - 31,770-gallon storage tank	EP-188
EU0620	T-2545 - 31,770-gallon storage tank	EP-189
EU0630	T-2546 - 31,770-gallon storage tank	EP-190
EU0640	T-2547 - 31,770-gallon storage tank	EP-191
EU0650	T-2548 - 31,770-gallon storage tank	EP-192
EU0660	T-2549 - 31,770-gallon storage tank	EP-193

EU0670	T-2550 - 31,770-gallon storage tank	EP-194
EU0680	T-2551 - 31,770-gallon storage tank	EP-195
EU0690	T-2555 - 29,980-gallon storage tank	EP-199
EU0700	T-2601 - 19,880-gallon storage tank	EP-200
EU0710	T-2602 - 19,880-gallon storage tank	EP-201
EU0720	T-2603 - 19,880-gallon storage tank	EP-202
EU0730	T-2604 - 19,880-gallon storage tank	EP-203
EU0740	T-2605 - 19,880-gallon storage tank	EP-204
EU0750	T-5405 - 36,140-gallon storage tank	EP-28
EU0760	T-5410 - 36,140-gallon storage tank	EP-29
EU0770	T-5415 - 36,140-gallon storage tank	EP-30
EU0780	T-5420 - 36,140-gallon storage tank	EP-31
EU0790	T-5218 - 172,950-gallon storage tank	EP-10
EU0800	T-2530 - 516,540-gallon storage tank	EP-174
EU0810	T-2531 - 516,540-gallon storage tank	EP-175
EU0820	T-2532 - 516,540-gallon storage tank	EP-176
EU0830	T-2533 - 516,540-gallon storage tank	EP-177
EU0840	T-2534 - 516,540-gallon storage tank	EP-178
EU0850	T-6001 - 96,380-gallon storage tank	EP-17

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.

<u>Description of Emission Source</u>	<u>2008 EIQ EP #</u>
R-6001: 2,160-gallon reactor, building 13	EP-1
T-5252: 4,140-gallon cooling tank, building 13	EP-1
V-6001: 470-gallon separator tank, building 13	EP-1
V-6002: 780-gallon separator tank, building 13	EP-1
V-6005: 1,150-gallon water receiver, building 13	EP-1
V-6006: 480-gallon vacuum water tank, building 13	EP-1
T-6201: 4,140-gallon cooling tank for R-6002, building 13	EP-1
T-6202: 4,140-gallon cooling tank for R-6002, building 13	EP-1
T-5214: 30,500-gallon storage tank, building 11, manufactured 1973	EP-8
T-5102: 30,500-gallon storage tank, building 11, manufactured 1973	EP-9
T-5202: 16,940-gallon storage tank, manufactured 1986	EP-12
T-5203: 34,310-gallon storage tank, building 11, manufactured 1973	EP-13
T-5210: 11,860-gallon storage tank, building 11, manufactured 1973	EP-20
R-6003: 8,240-gallon reactor south, building 14	EP-24-1
R-6004: 6,190-gallon reactor north, building 14	EP-24
R-5353: 12,870-gallon premix tank, building 14	EP-24
R-5355: 2,640-gallon premix tank, building 14	EP-24-2
V-6003: 1,320-gallon separator tank, building 14	EP-24
V-6004: 1,320-gallon separator tank, building 14	EP-24
T-1401: 6,370-gallon steam condensate receiver, building 14	EP-24
T-1402: 8,470-gallon process water recycle tank, building 14	EP-24
T-6005: 480-gallon water for vacuum pump tank, building 14	EP-24

T-5101: 30,500-gallon storage tank, building 11, manufactured 1973	EP-32
T-2211: 9,410-gallon storage tank, building 22	EP-43
T-2212: 9,410-gallon storage tank, building 22	EP-44
T-2213: 9,410-gallon storage tank, building 22	EP-45
T-2214: 9,410-gallon storage tank, building 22	EP-46
T-2215: 9,410-gallon storage tank, building 22	EP-47
T-2216: 9,410-gallon storage tank, building 22	EP-48
T-2301: 10,170-gallon storage tank, building 23	EP-49
T-2302: 7,060-gallon storage tank, building 23	EP-50
T-2303: 2,120-gallon storage tank, building 23	EP-51
T-2305: 321-gallon storage tank, building 23	EP-53
T-1901: 17,120-gallon storage tank, building 19	EP-61
T-1902: 15,660-gallon storage tank, building 19	EP-62
T-1903: 15,660-gallon storage tank, building 19	EP-63
T-1904: 15,660-gallon storage tank, building 19	EP-64
T-1905: 15,660-gallon storage tank, building 19	EP-65
T-1906: 15,660-gallon storage tank, building 19	EP-66
T-2001a: 17,120-gallon-gallon storage tank, building 20	EP-67-1
T-2001b: 17,120-gallon-gallon storage tank, building 20	EP-67-2
R-2001: 6,220-gallon mixing tank, building 20	EP-68
R-2002: 6,220-gallon mixing tank, building 20	EP-69
R-2401: 10,890-gallon mixing tank, building 24	EP-70
R-2402: 10,890-gallon mixing tank, building 24	EP-71
R-2403: 10,890-gallon mixing tank, building 24	EP-72
T-2401: 11,860-gallon storage tank, building 24	EP-73
T-2402: 15,660-gallon storage tank, building 24	EP-74
T-2403: 17,120-gallon storage tank, building 24	EP-75
T-2404: 17,120-gallon storage tank, building 24	EP-76
T-2405: 11,860-gallon storage tank, building 24	EP-77
T-2002: 10,170-gallon storage tank, building 20	EP-78
T-6003: 7,060-gallon storage tank, building 11	EP-85
T-6004: 12,710-gallon storage tank, building 11	EP-86
Trifluralin transfer	EP-87
R-401: 5,880-gallon storage tank, building 4	EP-88
R-402: 4,670-gallon storage tank, building 4	EP-88
T-401: 6,020-gallon storage tank, building 4	EP-88
T-407: 5,720-gallon storage tank, building 4	EP-88
T-402: 2,100-gallon storage tank, building 4	EP-91
MPCA dump station	EP-93
R-404: 6,470-gallon premix tank, building 9	EP-94
T-601: 35,260-gallon storage tank, manufactured 1972	EP-98
T-602: 2,310-gallon mixing tank, building 6	EP-99
T-603: 5,310-gallon mixing tank, building 6	EP-100
T-604: 5,470-gallon mixing tank, building 6	EP-101
T-605: 5,310-gallon mixing tank, building 6	EP-102
T-606: 5,310-gallon mixing tank, building 6	EP-103
T-607: 5,470-gallon mixing tank, building 6	EP-104

T-608: 5,580-gallon mixing tank, building 6	EP-105
T-612: 2,000-gallon mixing tank, building 6	EP-108
T-613: 1,490-gallon mixing tank, building 6	EP-109
T-614: 1,490-gallon mixing tank, building 6	EP-110
T-706: 11,670-gallon emulsifier, building 7	EP-112
T-707: 11,670-gallon emulsifier, building 7	EP-113
T-708: 11,670-gallon storage tank, building 7	EP-114
T-1706: 16,940-gallon storage tank; building 17	EP-124
T-1707: 16,940-gallon storage tank; building 17	EP-125
T-1708: 16,940-gallon storage tank; building 17	EP-126
T-408: 6,020-gallon storage tank, building 4	EP-130
T-409: 6,020-gallon storage tank, building 4	EP-131
T-2003: 9,250-gallon storage tank, building 20	EP-132
T-2004: 9,250-gallon storage tank, building 20	EP-133
T-709, 9,250-gallon storage tank, building 7	EP-134
T-2501: 7,200-gallon storage tank, building 25	EP-136
T-2502: 7,200-gallon storage tank, building 25	EP-137
T-2503: 1,270-gallon storage tank, building 25	EP-138
R-2501: 11,860-gallon reactor, building 25	EP-139
R-2502: 11,860-gallon reactor, building 25	EP-140
R-2503: 11,860-gallon reactor, building 25	EP-141
R-2504: 11,860-gallon reactor, building 25	EP-142
R-2505: 11,860-gallon reactor, building 25	EP-143
R-2506: 11,860-gallon reactor, building 25	EP-144
R-2507: 11,440-gallon reactor, building 25	EP-145
R-2508: 11,440-gallon reactor, building 25	EP-146
T-2504: 18,450-gallon storage tank, building 25	EP-147
T-2505: 3,170-gallon storage tank, building 25	EP-148
T-2506: 18,450-gallon storage tank, building 25	EP-149
T-2507: 3,170-gallon storage tank, building 25	EP-150
T-2508: 2,540-gallon storage tank, building 25	EP-151
T-2509: 2,540-gallon storage tank, building 25	EP-152
T-2510: 2,540-gallon storage tank, building 25	EP-153
T-2511: 2,540-gallon storage tank, building 25	EP-154
T-2514: 18,450-gallon storage tank, building 25	EP-157
T-2519: 18,450-gallon storage tank, building 25	EP-162
E-2501: thin film evaporator	EP-171
T-2528: 10,170-gallon storage tank, building 25	EP-172
T-2529: 10,170-gallon storage tank, building 25	EP-173
T-2552: 3,460-gallon storage tank, building 25	EP-196
T-2553: 1,470-gallon storage tank, building 25	EP-197
T-2554: 287-gallon storage tank, building 25	EP-198
T-2412: 12,280-gallon storage tank, building 24	EP-220
T-2413: 12,280-gallon storage tank, building 24	EP-221
T-2414: 12,280-gallon storage tank, building 24	EP-222
T-2415: 12,280-gallon storage tank, building 24	EP-223
Bulk loadout	EP-224

T-2606: 12,280-gallon storage tank, building 26	EP-205
T-2607: 12,280-gallon storage tank, building 26	EP-206
T-2608: 12,280-gallon storage tank, building 26	EP-207
T-2609: 12,280-gallon storage tank, building 26	EP-208
T-2610: 12,280-gallon storage tank, building 26	EP-209
T-2611: 8,530-gallon storage tank, building 26	EP-210
T-2612: 8,530-gallon storage tank, building 26	EP-211
T-2613: 8,530-gallon storage tank, building 26	EP-212
T-2614: 8,530-gallon storage tank, building 26	EP-213
T-2615: 8,530-gallon storage tank, building 26	EP-214
T-2616: 5,590-gallon storage tank, building 26	EP-215
T-2617: 5,590-gallon storage tank, building 26	EP-216
T-2618: 5,590-gallon storage tank, building 26	EP-217
T-2619: 5,590-gallon storage tank, building 26	EP-218
T-2620: 5,590-gallon storage tank, building 26	EP-219

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

- 1) Construction Permit #0486-005A, Issued April 28, 1986
- 2) Construction Permit #0794-021, Issued July 15, 1994
- 3) Construction Permit #0495-001, Issued March 17, 1995
- 4) Construction Permit #0895-001, Issued July 28, 1995
- 5) Construction Permit #1095-008, Issued September 25, 1995
- 6) Construction Permit #1295-011, Issued November 22, 1995
- 7) Construction Permit #1296-001, Issued November 18, 1996
- 8) Construction Permit #0797-010, Issued June 25, 1997
- 9) Construction Permit #1197-004, Issued October 21, 1997
- 10) Construction Permit #0198-003, Issued December 24, 1997
- 11) Construction Permit #0498-020, Issued March 30, 1998
- 12) Construction Permit #1099-005, Issued September 24, 1999
- 13) Construction Permit #112000-015, Issued December 4, 2000
- 14) Construction Permit #012005-007, Issued January 21, 2005
- 15) Construction Permit #032009-004, Issued March 10, 2009

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

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

Emission Limitation:

- 1) The permittee shall emit less than 100 tons of volatile organic compounds (VOC) in any consecutive twelve-month period.
- 2) The permittee shall emit less than ten tons of any individual Hazardous Air Pollutant (HAP) and less than twenty-five tons of any combination of HAPs in any consecutive twelve-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of the VOC and HAP emissions. Attachments A, B, and C, or equivalent forms, shall be used to demonstrate compliance with the emission limits.
- 2) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 3) 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.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit #0495-001, Issued March 17, 1995
Construction Permit #0895-001, Issued July 28, 1995
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Construction Permit #0198-003, Issued December 24, 1997
Construction Permit #1099-005, Issued September 24, 1999

Reporting:

Restriction of Odor. If a continued situation of demonstrated nuisance odors exists in violation of 10 CSR 10-2.070, the Director may require Albaugh, Inc. to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. Albaugh shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be in violation of this permit. [CP #0495-001, Special Condition 1; CP #0895-001, Special Condition 1; CP #1095-008, Special Condition 2; CP #1295-011, Special Condition 3; CP# 1296-001 Special Condition 1; CP #0198-003, Special Condition 1; CP #1099-005, Special Condition 1]

III. Emission Unit Specific Emission Limitations

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

EU0010 – R-6002		
Emission Unit	Description	2008 EIQ Reference #
EU0010	R-6002: 5,310-gallon Pfaundler reactor used for the preparation of 2,4-Dichlorophenoxyacetic acid (2,4-D) esters; manufacture date 1994; building 13	EP-1

PERMIT CONDITION EU0010-001
10 CSR 10-6.060 Construction Permits Required Construction Permit #0794-021, Issued July 15, 1994

Emission Limitation:

Albaugh, Inc. shall limit the production of 2,4-D esters in the R-6002 (EU0010) to 696,000 gallons in any 12-month cumulative period. [CP #0794-021, Special Condition 1]

Monitoring:

All emission controls proposed in the Construction Permit #0794-021 application shall be well maintained according to manufacturer's specifications and used at all times this facility is in operation. [CP #0794-021, Special Condition 4]

Recordkeeping:

- 1) Records shall be kept that list the monthly amount of 2,4-D esters produced in the reactor. These records shall also indicate the total quantity of 2,4-D esters produced over the previous 12-month period. [CP #0794-021, Special Condition 2]
- 2) Attachment D or an equivalent form shall be used to demonstrate compliance with the production limits. All records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

Albaugh, Inc. shall submit a copy of the records (Attachment D) that demonstrate noncompliance with the production limits to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten (10) days of the end of the time period showing noncompliance. [CP #0794-021, Special Condition 3]

EU0020 – T-1701		
EU0030 – T-1702		
EU0040 – T-1703		
EU0050 – T-1704		
EU0060 – T-1705		
EU0070 – T-1709		
EU0080 – T-1710		
EU0090 – T-1711		
Emission Unit	Description	2008 EIQ Reference #
EU0020	T-1701: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-119
EU0030	T-1702: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-120
EU0040	T-1703: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-121
EU0050	T-1704: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-122
EU0060	T-1705: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-123
EU0070	T-1709: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-127
EU0080	T-1710: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-128
EU0090	T-1711: 19,480-gallon storage tank; building 17; manufacture date 1995	EP-129

PERMIT CONDITION (EU0020 through EU0090)-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit #0895-001, Issued July 28, 1995

Operational Specifications:

Operations used to limit Volatile Organic Compounds (VOC) emissions from the storage tanks (EU0020 through EU0090) shall include submerged filling of tanks. Conservation vents shall be a part of the tank construction. [CP #0895-001, Special Condition 2]

Reporting:

The permittee shall report any deviations 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, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

EU0100 – R-5302		
Emission Unit	Description	2008 EIQ Reference #
EU0100	R-5302: 20,880-gallon cooling tank; building 14; manufacture date 1995	EP-24

PERMIT CONDITION EU0100-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit #1095-008, Issued September 25, 1995

Operational Specifications:

The cooling tank R-5302 (EU0100)'s VOC emissions shall be controlled by a tube and shell condenser and an activated carbon adsorption system. [CP #1095-008, Special Condition 3]

Reporting:

The permittee shall report any deviations 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, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION EU0100-002

10 CSR 10-6.070 New Source Performance Regulations
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*

Note: R-5302 (EU0100) has a design capacity greater than or equal to 75 m³ (19,810 gallon) but less than 151 m³ (39,890 gallon) and contains a volatile organic liquid that has a maximum true vapor pressure less than 27.6 kPa. Therefore, the installation of control equipment is not required and §60.112b, §60.113b, §60.114b, §60.115b are not applicable.

Recordkeeping:

- 1) The permittee shall keep readily accessible records showing the dimension of the storage vessel and a calculation showing the capacity of the storage vessels. These records shall be kept for the life of the source. [§60.116b(a) and §60.116b(b)]
- 2) If the maximum true vapor pressure of the liquid stored in EU0100 is greater than or equal to 15.0 kPa, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. These records shall be kept for a minimum of 5 years. [§60.116b(a) and §60.116b(c)]
- 3) All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Testing:

- 1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
 - b) The vapor pressure: [§60.116b(e)(3)]
 - i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
 - ii) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(e)(3)(ii)]
 - iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]
 - iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]
- 2) The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements. [§60.116b(f)]
 - a) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in §60.116b(e). [§60.116b(f)(1)]

- b) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods: [§60.116b(f)(2)]
- i) ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(i)]
 - ii) ASTM D323-82 or 94 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(ii)]
 - iii) As measured by an appropriate method as approved by the Director. [§60.116b(f)(2)(iii)]

Reporting:

If the maximum true vapor pressure of the liquid stored in EU0100 exceeds 27.6 kPa, the permittee shall notify the Director within 30 days. [§60.116b(d)].

EU0110 – T-6002		
Emission Unit	Description	2008 EIQ Reference #
EU0110	T-6002: 381,760-gallon carbon steel chemical storage tank; contents - 2,4 Dichlorophenoxyacetic Acid, 2-Ethylhexyl Ester; building 11; manufacture date 1996	EP-26

PERMIT CONDITION EU0110-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit #1295-011, Issued November 22, 1995

Operational Specifications:

- 1) Construction Permit #1295-011 only allows for the storage of 2, 4 Dichlorophenoxyacetic Acid, 2-Ethylhexyl Ester in the storage tank T-6002 (EU0110). If other chemicals are desired to be stored in this tank, an application should be submitted to determine the need for a construction permit amendment. [CP #1295-011, Special Condition 1]
- 2) Storage tank T-6002 (EU0110)'s emissions shall be controlled by submerged filling, and a conservation vent installed on the tank. [CP #1295-011, Special Condition 2]

Reporting:

The permittee shall report any deviations 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, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

EU0120 – T-5215 EU0130 – T-7001 EU0140 – T-7002 EU0150 – T-7003 EU0160 – T-7004 EU0170 – T-609 EU0180 – T-611		
Emission Unit	Description	2008 EIQ Reference #
EU0120	T-5215: 12,710-gallon storage tank; building 11; manufacture date 1990	EP-22
EU0130	T-7001: 21,910-gallon storage tank; building 15; manufacture date 1997	EP-115
EU0140	T-7002: 21,910-gallon storage tank; building 15; manufacture date 1997	EP-116
EU0150	T-7003: 21,910-gallon storage tank; building 15; manufacture date 1997	EP-117
EU0160	T-7004: 21,910-gallon storage tank; building 15; manufacture date 1997	EP-118
EU0170	T-609: 3,750-gallon storage tank; building 6; manufacture date 1986	EP-106
EU0180	T-611: 860-gallon storage tank; building 6; manufacture date 1986	EP-107

PERMIT CONDITION (EU0120 through EU0180)-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit #0797-010, Issued June 25, 1997

Emission Limitation:

The permittee shall not emit more than 6.82 tons of volatile organic compounds from the storage vessels identified as T-5215, T-7001, T-7002, T-7003, T-7004, T-609, and T-611 (EU0120 through EU0180) in any consecutive 12-month period. [CP #0797-010, Special Condition 1]

Recordkeeping:

The permittee shall maintain an accurate monthly record of volatile organic compound emissions from the storage vessels identified as T-5215, T-7001, T-7002, T-7003, T-7004, T-609, and T-611 (EU0120 through EU0180) at this installation. These records shall include monthly and rolling 12-month totals. These records shall be kept on-site for the most recent sixty (60) month period of operation and be made immediately available to Department of Natural Resources' personnel upon request. Records shall be on Attachment E or on any substantially conforming form that contains the same information. [CP #0797-010, Special Condition 2]

Reporting:

The Permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month, if the 12-month cumulative total records (Attachment E) show that EU0120 through EU0180 exceeded the Emission Limitation. [CP #0797-010, Special Condition 3]

PERMIT CONDITION (EU0130 through EU0160)-002

10 CSR 10-6.070 New Source Performance Regulations
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*

Note: EU0130 through EU0160 each have a design capacity greater than or equal to 75 m³ (19,810 gallon) but less than 151 m³ (39,890 gallon) and contain volatile organic liquids that have a maximum true vapor pressure less than 27.6 kPa. Therefore, the installation of control equipment is not required and §60.112b, §60.113b, §60.114b, §60.115b are not applicable.

Recordkeeping:

- 1) The permittee shall keep readily accessible records showing the dimension of the storage vessel and a calculation showing the capacity of the storage vessels. These records shall be kept for the life of the source. [§60.116b(a) and §60.116b(b)]
- 2) If the maximum true vapor pressure of the liquid stored in EU0130 through EU0160 is greater than or equal to 15.0 kPa, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. These records shall be kept for a minimum of 5 years. [§60.116b(a) and §60.116b(c)]
- 3) All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Testing:

- 1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
 - b) The vapor pressure: [§60.116b(e)(3)]
 - i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
 - ii) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(e)(3)(ii)]
 - iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]
 - iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]
- 2) The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements. [§60.116b(f)]
 - a) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in §60.116b(e). [§60.116b(f)(1)]
 - b) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods: [§60.116b(f)(2)]
 - i) ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(i)]
 - ii) ASTM D323-82 or 94 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(ii)]

iii) As measured by an appropriate method as approved by the Director. [§60.116b(f)(2)(iii)]

Reporting:

If the maximum true vapor pressure of the liquids stored in EU0130 through EU0160 exceeds 27.6 kPa, the permittee shall notify the Director within 30 days. [§60.116b(d)]

EU0190 – T-2306 EU0200 – T-2307 EU0210 – T-2556 EU0220 – T-2557		
Emission Unit	Description	2008 EIQ Reference #
EU0190	T-2306: 11,930-gallon storage/mixing tank; vertical fixed roof; building 23; used to produce Landstar; manufacture date 2009	NA
EU0200	T-2307: 11,930-gallon storage/mixing tank; vertical fixed roof; building 23; used to produce Fallowstar; manufacture date 2009	NA
EU0210	T-2556: 11,930-gallon storage/mixing tank; vertical fixed roof; building 25; used to produce isopropylamine salt of glyphosate; manufacture date 2009	NA
EU0220	T-2557: 11,930-gallon storage/mixing tank; vertical fixed roof; building 25; used to produce isopropylamine salt of glyphosate; manufacture date 2009	NA

PERMIT CONDITION(EU0190 through EU0220)-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit #032009-004, Issued March 10, 2009

Emission Limitation:

Albaugh, Inc. shall emit less than 40.0 tons of Volatile Organic Compounds (VOCs) from emission points T-2306, T-2307, T-2556 and T-2557 (EU0190 through EU0220) in any consecutive 12-month period. [CP #032009-004, Special Condition 1]

Recordkeeping:

Attachment F or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the Emission Limitation. Albaugh, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials stored or mixed in the tanks. [CP #032009-004, Special Condition 2]

Reporting:

Albaugh, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the 12-month cumulative total records (Attachment F) indicate that the source exceeds the Emission Limitation. [CP #032009-004, Special Condition 3]

EU0230 THROUGH EU0780 – TANKS VOLUME $\geq 75 \text{ M}^3$ AND $< 151 \text{ M}^3$		
Emission Unit	Description	2008 EIQ Reference #
EU0230	T-2201: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-33
EU0240	T-2202: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-34
EU0250	T-2203: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-35
EU0260	T-2204: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-36
EU0270	T-2205: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-37
EU0280	T-2206: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-38
EU0290	T-2207: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-39
EU0300	T-2208: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-40
EU0310	T-2209: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-41
EU0320	T-2210: 32,280-gallon storage tank; building 22; manufacture date 1999	EP-42
EU0330	T-2406: 23,060-gallon storage tank; building 24; manufacture date 2001	EP-79
EU0340	T-2407: 23,060-gallon storage tank; building 24; manufacture date 2001	EP-80
EU0350	T-2408: 23,060-gallon storage tank; building 24; manufacture date 2001	EP-81
EU0360	T-2409: 23,060-gallon storage tank; building 24; manufacture date 2001	EP-82
EU0370	T-2410: 23,060-gallon storage tank; building 24; manufacture date 2001	EP-83
EU0380	T-2411: 23,060-gallon storage tank; building 24; manufacture date 2001	EP-84
EU0390	T-2512: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-155
EU0400	T-2513: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-156
EU0410	T-2515: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-158
EU0420	T-2516: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-159
EU0430	T-2517: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-160
EU0440	T-2518: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-161
EU0450	T-2520: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-163
EU0460	T-2521: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-164
EU0470	T-2522: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-165
EU0480	T-2523: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-166
EU0490	T-2524: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-167
EU0500	T-2525: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-168
EU0510	T-2526: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-169
EU0520	T-2527: 27,670-gallon storage tank; building 25; manufacture date 2005	EP-170
EU0530	T-2536: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-180
EU0540	T-2537: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-181
EU0550	T-2538: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-182
EU0560	T-2539: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-183
EU0570	T-2540: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-184
EU0580	T-2541: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-185
EU0590	T-2542: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-186
EU0600	T-2543: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-187
EU0610	T-2544: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-188
EU0620	T-2545: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-189
EU0630	T-2546: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-190
EU0640	T-2547: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-191
EU0650	T-2548: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-192
EU0660	T-2549: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-193
EU0670	T-2550: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-194
EU0680	T-2551: 31,770-gallon storage tank; building 25; manufacture date 2005	EP-195

EU0690	T-2555: 29,980-gallon storage tank; building 25; manufacture date 2005	EP-199
EU0700	T-2601: 19,880-gallon storage tank; building 26; manufacture date 2007	NA
EU0710	T-2602: 19,880-gallon storage tank; building 26; manufacture date 2007	NA
EU0720	T-2603: 19,880-gallon storage tank; building 26; manufacture date 2007	NA
EU0730	T-2604: 19,880-gallon storage tank; building 26; manufacture date 2007	NA
EU0740	T-2605: 19,880-gallon storage tank; building 26; manufacture date 2007	NA
EU0750	T-5405: 36,140-gallon storage tank; building 11; manufacture date 1997	EP-28
EU0760	T-5410: 36,140-gallon storage tank; building 11; manufacture date 1997	EP-29
EU0770	T-5415: 36,140-gallon storage tank; building 11; manufacture date 1997	EP-30
EU0780	T-5420: 36,140-gallon storage tank; building 11; manufacture date 1997	EP-31

PERMIT CONDITION (EU0230 through EU0780)-001

10 CSR 10-6.070 New Source Performance Regulations

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*

Note: EU0230 through EU0780 each have a design capacity greater than or equal to 75 m³ (19,810 gallon) but less than 151 m³ (39,890 gallon) and contain volatile organic liquids that have a maximum true vapor pressure less than 27.6 kPa. Therefore, the installation of control equipment is not required and §60.112b, §60.113b, §60.114b, §60.115b are not applicable.

Recordkeeping:

- 1) The permittee shall keep readily accessible records showing the dimension of the storage vessel and a calculation showing the capacity of the storage vessels. These records shall be kept for the life of the source. [§60.116b(a) and §60.116b(b)]
- 2) If the maximum true vapor pressure of the liquid stored in EU0230 through EU0780 is greater than or equal to 15.0 kPa, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. These records shall be kept for a minimum of 5 years. [§60.116b(a) and §60.116b(c)]
- 3) All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Testing:

- 1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
 - b) The vapor pressure: [§60.116b(e)(3)]
 - i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
 - ii) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(e)(3)(ii)]
 - iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]
 - iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]

- 2) The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements. [§60.116b(f)]
 - a) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in §60.116b(e). [§60.116b(f)(1)]
 - b) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods: [§60.116b(f)(2)]
 - i) ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(i)]
 - ii) ASTM D323-82 or 94 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(ii)]
 - iii) As measured by an appropriate method as approved by the Director. [§60.116b(f)(2)(iii)]

Reporting:

If the maximum true vapor pressure of the liquids stored in EU0230 through EU0780 exceeds 27.6 kPa, the permittee shall notify the Director within 30 days. [§60.116b(d)]

EU0790 THROUGH EU0850 – TANKS VOLUME ≥ 151 M³		
Emission Unit	Description	2008 EIQ Reference #
EU0790	T-5218: 172,950-gallon storage tank; building 25; manufacture date 1996	EP-10
EU0800	T-2530: 516,540-gallon storage tank; building 25; manufacture date 2005	EP-174
EU0810	T-2531: 516,540-gallon storage tank; building 25; manufacture date 2005	EP-175
EU0820	T-2532: 516,540-gallon storage tank; building 25; manufacture date 2005	EP-176
EU0830	T-2533: 516,540-gallon storage tank; building 25; manufacture date 2005	EP-177
EU0840	T-2534: 516,540-gallon storage tank; building 25; manufacture date 2005	EP-178
EU0850	T-6001: 96,380-gallon storage tank; building 11; manufacture date 1984	EP-17

PERMIT CONDITION (EU0790 through EU0850)-001
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart Kb, <i>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</i>

Note: EU0790 through EU0850 each have a design capacity greater than or equal to 151 m³ (39,890 gallon) and contain volatile organic liquids that have a maximum true vapor pressure less than 5.2 kPa. Therefore, the installation of control equipment is not required and §60.112b, §60.113b, §60.114b, §60.115b are not applicable.

Recordkeeping:

- 1) The permittee shall keep readily accessible records showing the dimension of the storage vessel and a calculation showing the capacity of the storage vessels. These records shall be kept for the life of the source. [§60.116b(a) and §60.116b(b)]
- 2) If the maximum true vapor pressure of the liquid stored in EU0790 through EU0850 is greater than or equal to 3.5 kPa, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. These records shall be kept for a minimum of 5 years. [§60.116b(a) and §60.116b(c)]

Testing:

- 1) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
 - b) The vapor pressure: [§60.116b(e)(3)]
 - i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
 - ii) Determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or [§60.116b(e)(3)(ii)]
 - iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]
 - iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]
- 2) The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements. [§60.116b(f)]
 - a) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in §60.116b(e). [§60.116b(f)(1)]
 - b) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods: [§60.116b(f)(2)]
 - i) ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(i)]
 - ii) ASTM D323-82 or 94 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(ii)]
 - iii) As measured by an appropriate method as approved by the Director. [§60.116b(f)(2)(iii)]

Reporting:

If the maximum true vapor pressure of the liquids stored in EU0790 through EU0850 exceeds 5.2 kPa, the permittee shall notify the Director within 30 days. [§60.116b(d)]

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 1. 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;
 2. 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;
 3. 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
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. 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;
 3. 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:
 - A. 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;
 - B. 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;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. 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

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

- i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
 - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
 - 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
 - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

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 10-2.070 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

10 CSR 10-6.220 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 (10, 20 or 40 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 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage
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- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

None.

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

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Spencer Vance. In a letter dated February 8, 2010, the Air Pollution Control Program was informed that Jim Kahnk, COO, is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment E

VOC Emission Limitation Worksheet – EU0120 through EU0180

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of Permit Condition (EU0120 through EU0180)-001.

Tank ID	Month's Throughput		Emission Factor		Month's VOC Emissions	
EU0120 – T-5215 (Breathing Loss)		Tgal	0.001	lb/Tgal		tons
EU0120 – T-5215 (Working Loss)		Tgal	0.03	lb/Tgal		tons
EU0130 – T-7001		gal	0.05	lb/gal		tons
EU0140 – T-7002		gal	0.05	lb/gal		tons
EU0150 – T-7003		gal	0.05	lb/gal		tons
EU0160 – T-7004		gal	0.05	lb/gal		tons
EU0170 – T-609		gal	0.01	lb/gal		tons
EU0180 – T-611		gal	0.01	lb/gal		tons
Total VOC Emission for this Month (tons):						
12-Month Cumulative VOC Emissions (tons/year):						

Notes: Tgal = 1000 gallons

A 12-Month cumulative VOC emission of not more than 6.82 tons indicates compliance.

Attachment F

VOC Emission Limitation Worksheet – EU0190 through EU0220
Mix Tanks T-2306, T-2307, T-2556 and T-2557

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of Permit Condition (EU0190 through EU0220)-001.

Albaugh, Inc.
Buchanan County, S30, T57N, R35W
Project Number: 2008-11-013
Installation ID: 021-0037
Permit Number: OP2010-035

This sheet covers the month of _____
(month, year)

Column 1	Column 2	Column 3	Column 4	Column 5
Date	Tank I.D. and Product	Amount of Product Produced (1000 gal)	Product-Specific VOC Emission Factor (lbs VOC/1000 gal)	VOC Emissions Per Tank (tons) (a)
Example	T-2306, Landstar	20	6.92	0.0692
	T-2307, Fallowstar	20	4.47	0.0447
	T-2556, Glyphosate 62	600	2.93	0.879
	T-2557, Glyphosate 62	600	2.93	0.879
(b) Total emissions calculated for this month in tons:				1.87
(c) 12-Month emissions total from previous months worksheet in tons:				22.56
(d) Monthly emissions total (b) from last year's worksheet for this month in tons:				2.31
(e) Current 12-month total of emissions in tons: [(b) + (c) - (d)]				22.12

(a) Column 5 = Column 3 x Column 4 x 0.0005

A 12-Month emissions total (e) of less than 40 tons indicates compliance.

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received June 4, 2007;
- 2) 2008 Emissions Inventory Questionnaire, received May 29, 2009; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 10 CSR 10-6.100, *Alternate Emission Limits*
 - a) This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

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

- 1) Construction Permit #0486-005A authorized the installation of an esterification of 2,4-dichlorophenoxyacetic acid (2,4-D) process. Emission points authorized by this construction permit that are currently at the facility include T-6001 (EU0850), T-5101 (EP-32), T-5102 (EP-9), T-5202 (EP-12), T-5203 (EP-13), T-5210 (EP-20), and T-5214 (EP-8).
 - a) The following tanks were removed from the facility and are not included in the operating permit: T-5201, T-5204, T-5205, T-5206, T-5207, T-5208, T-5209, T-5211, T-5212, and T-5213.
 - b) This construction permit indicated that 10 CSR 10-2.030, *Restriction of Emission of Particulate Matter from Industrial Processes*, is an applicable regulation. However, this rule was rescinded

on March 30, 2001, and replaced by 10 CSR 10-6.400. 10 CSR 10-6.400 is not applied because the emission units do not have the potential to emit PM at a rate greater than or equal to 0.5 lb/hr and according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of particulate matter are exempt.

- 2) Construction Permit #0794-021 authorized the installation of R-6002 (EU0010), a 3,000-gallon reactor used to produce 2,4-dichlorophenoxyacetic acid (2,4-D).
 - a) By the authorization of Construction Permit #0198-003, R-6002 (EU0010) was replaced in 1998 with a 5,000-gallon reactor. Construction Permit #0198-003 did not revoke the Special Conditions in Construction Permit #0794-021. Consequently, these special conditions are listed in Permit Condition EU0010-001.
 - b) Special Condition 2 requires that the records be kept for at least 24-months. However, state operating permit regulations require records to be kept for a minimum of five (5) years.
 - c) The Applicable Emission Regulations section of this construction permit indicated that 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. 10 CSR 10-3.080 was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 is not applied to these units since it is highly unlikely that equipment would ever exceed the 20% opacity threshold required by this rule.
 - d) The Applicable Emission Regulations section of this construction permit indicated that 10 CSR 10-3.050, *Restriction of Emission of Particulate Matter from Industrial Processes*, is an applicable regulation. 10 CSR 10-3.050 was rescinded on March 30, 2001 and replaced by 10 CSR 10-6.400. This rule is not applied because R-6002 (EU0010) does have the potential to emit PM at a rate greater than or equal to 0.5 lb/hr and according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of particulate matter are exempt.
- 3) Construction Permit #0495-001 authorized the installation of two 3,500-gallon premix tanks and 2,4-D acid dump station.
 - a) The premix tanks and acid dump station were removed under Project #2001-11-37. These units are not included in the operating permit.
- 4) Construction Permit #0895-001 authorized the installation of eight storage tanks: T-1701 through T-1705 (EU0020 through EU0060) and T-1709 through T-1711 (EU0070 through EU0090).
 - a) There are no revisions to this construction permit.
- 5) Construction Permit #1095-008 authorized the installation R-5302 (EU0100), R-5353 (EP-24), R-6003 (EP-24) and R-6004 (EP-24).
 - a) Special Condition 1 refers to a required stack test of an acid dumping station. Since the test was required to be completed in 1995 and the acid dumping station was removed from the facility in 2001, Special Condition 1 is not included in the operating permit.
- 6) Construction Permit #1295-011 authorized the installation of T-6002 (EU0110).
 - a) There are no revisions to this construction permit.
- 7) Construction Permit #1296-001 authorized the installation of T-5218 (EU0790).
 - a) There are no revisions to this construction permit.
- 8) Construction Permit #0797-010 authorized the installation of eleven storage tanks. The storage tanks authorized by this construction permit that are currently at the facility include T-5215 (EU0120), T-7001 (EU0130), T-7002 (EU0140), T-7003 (EU0150), T-7004 (EU0160), T-609 (EU0170) and T-611(EU0180).
 - a) The following tanks were removed from the facility: T-404, T-405, T-406 and T-705. These units are not included in the operating permit.

- b) The Applicable Requirement section of this construction permit indicated that 40 CFR Part 60 subpart Kb is applicable to T-5215 (EU0120). However, this rule was amended on October 15, 2003 (68 FR 59332) to exclude storage tanks with capacities less than 75 m³ (19,810 gallons). Since T-5215 (EU0120) is 12,700 gallons, this rule is not applicable.
- 9) Construction Permit #1197-004 authorized the installation of T-5405 (EU0750), T-5410 (EU0760), T-5415 (EU0770) and T-5420 (EU0780).
- a) There are no revisions to this construction permit.
- 10) Construction Permit #0198-003 authorized the installation of R-6002 (EU0010), T-6201 (EP-1) and T-6202 (EP-1).
- a) T-6201 and T-6202 were mislabeled as R-6201 and R-6202 in the construction permit.
- 11) Construction Permit #0498-020 authorized the installation of T-407 (EP-88), T-706 (EP-112), T-707 (EP-113), and T-708 (EP-114).
- a) The Applicable Requirement section of this construction permit indicated that 40 CFR Part 60 subpart Kb is applicable to storage tanks T-706 (EP-112), T-707 (EP-113), and T-708 (EP-114). However, this rule was amended on October 15, 2003 (68 FR 59332) to exclude storage tanks with capacities less than 75 m³ (19,810 gallons). Since these tanks each have a capacity less than 19,810-gallons, this rule is not applicable.
- 12) Construction Permit #1099-005 authorized the installation of twenty storage tanks. The storage tanks authorized by this construction permit that are currently at the facility include T-2201 through T-2210 (EU0230 through EU0320), T-2211 through T-2216 (EP-43 through EP-48) and T-2301 through T-2303 (EP-49 through EP-51).
- a) T-2304 (EP-52) was removed from the facility and is not included in the operating permit.
- b) The Applicable Requirement section of this construction permit indicated that 10 CSR 10-2.060, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. 10 CSR 10-2.060 was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 is not applied to these units since it is highly unlikely that equipment would ever exceed the 20% opacity threshold required by this rule.
- 13) Construction Permit #112000-015 authorized the installation of T-1901 through T-1906 (EP-61 through EP-66), T-2001 (EP-67), R-2001 (EP-68), R-2002 (EP-69), R-2401 through R-2403 (EP-70 through EP-72) and T-2401 through T-2405 (EP-73 through EP-77).
- a) The Applicable Requirement section of this construction permit indicated that 40 CFR Part 60 subpart Kb is applicable to the storage tanks listed below. However, this rule was amended on October 15, 2003 (68 FR 59332) to exclude storage tanks with capacities less than 75 m³ (19,810 gallons). Since the storage tanks have capacities below 19,810 gallons, this rule is not applicable.

EIQ EP #	Tank #	Capacity (gallons)
EP-61	T- 1901	17,120
EP-62	T-1902	15,660
EP-63	T-1903	15,660
EP-64	T-1904	15,660
EP-65	T-1905	15,660
EP-66	T-1906	15,660
EP-69	R-2002	6,220
EP-70	R-2401	10,890
EP-71	R-2402	10,890
EP-72	R-2403	10,890
EP-73	T-2401	11,860
EP-74	T-2402	15,660
EP-75	T-2403	17,120
EP-76	T-2404	17,120
EP-77	T-2405	11,860

Note: The EIQ EP ID numbers were changed by the facility; the numbers listed above are the current EIQ EP ID numbers.

- b) The Applicable Requirement section of this construction permit indicated that 10 CSR 10-2.060, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. 10 CSR 10-2.060 was rescinded on May 30, 2000, and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 is not applied to these units since it is highly unlikely that equipment would ever exceed the 20% opacity threshold required by this rule.

14) Construction Permit #012005-007 authorized the installation of a new glyphosate process that includes 54 emission units.

- a) Attachment A of this construction permit indicated which emission units are subject to 40 CFR Part 60 subpart Kb. However, several of the emission units that are listed as subject to subpart Kb do not meet the capacity criteria for the rule. The following table lists the emission units authorized by this construction permit that are currently at the facility, the capacity of the reactors, and storage/mixing tanks, and the applicability of subpart Kb.

EP ID #	EU # (if applicable)	Emission Point Description	Capacity (gallons)	Subpart Kb
EP-136	NA	T-2501	7,200	not applicable
EP-137	NA	T-2502	7,200	not applicable
EP-138	NA	T-2503	1,270	not applicable
EP-139	NA	R-2501	11,860	not applicable
EP-140	NA	R-2502	11,860	not applicable
EP-141	NA	R-2503	11,860	not applicable
EP-142	NA	R-2504	11,860	not applicable
EP-143	NA	R-2505	11,860	not applicable
EP-144	NA	R-2506	11,860	not applicable
EP-145	NA	R-2507	11,440	not applicable

EP ID #	EU # (if applicable)	Emission Point Description	Capacity (gallons)	Subpart Kb
EP-146	NA	R-2508	11,440	not applicable
EP-151	NA	T-2508	2,540	not applicable
EP-152	NA	T-2509	2,540	not applicable
EP-153	NA	T-2510	2,540	not applicable
EP-154	NA	T-2511	2,540	not applicable
EP-155	EU0390	T-2512	27,670	applicable
EP-156	EU0400	T-2513	27,670	applicable
EP-157	NA	T-2514	18,450	not applicable
EP-158	EU0410	T-2515	27,670	applicable
EP-159	EU0420	T-2516	27,670	applicable
EP-160	EU0430	T-2517	27,670	applicable
EP-161	EU0440	T-2518	27,670	applicable
EP-162	NA	T-2519	18,450	not applicable
EP-163	EU0450	T-2520	27,670	applicable
EP-164	EU0460	T-2521	27,670	applicable
EP-165	EU0470	T-2522	27,670	applicable
EP-166	EU0480	T-2523	27,670	applicable
EP-167	EU0490	T-2524	27,670	applicable
EP-168	EU0500	T-2525	27,670	applicable
EP-171	NA	E-2501	NA	not applicable
EP-172	NA	T-2528	10,170	not applicable
EP-173	NA	T-2529	10,170	not applicable
EP-174	EU0800	T-2530	516,540	applicable
EP-175	EU0810	T-2531	516,540	applicable
EP-176	EU0820	T-2532	516,540	applicable
EP-177	EU0830	T-2533	516,540	applicable
EP-178	EU0840	T-2534	516,540	applicable
EP-185	EU0580	T-2541	31,770	applicable
EP-186	EU0590	T-2542	31,770	applicable
EP-187	EU0600	T-2543	31,770	applicable
EP-188	EU0610	T-2544	31,770	applicable
EP-189	EU0620	T-2545	31,770	applicable
EP-190	EU0630	T-2546	31,770	applicable
EP-191	EU0640	T-2547	31,770	applicable
EP-192	EU0650	T-2548	31,770	applicable
EP-193	EU0660	T-2549	31,770	applicable
EP-194	EU0670	T-2550	31,770	applicable
EP-195	EU0680	T-2551	31,770	applicable

b) Tank T-2535 (EP-179) was never built and therefore is not included in the operating permit

- 15) Construction Permit #032009-004 authorized the installation T-2306, T-2307, T-2556, and T-2557 (EU0190 through EU0220).
- a) The Applicable Emission Regulations section of this construction permit indicated that 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*, is an applicable regulation. This rule is not applied because according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of particulate matter are exempt. (See **Other Regulatory Determinations** for calculations)
 - b) The Applicable Requirement section of this construction permit indicated that 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. This rule is not applied to these units since it is highly unlikely that the equipment would ever exceed the 20% opacity threshold required by this rule.

New Source Performance Standards (NSPS) Applicability

- 1) 40 CFR Part 60 Subpart K, *Standards of Performance For Storage Vessels For Petroleum Liquids For Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior To May 19, 1978*
- 2) 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*
 - a) There are no petroleum liquid storage vessels at the facility that meet the storage capacity and/or the date of construction specifications in these rules.
- 3) 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*
 - a) This rule applies to a storage vessel with a capacity greater than or equal to 75 cubic meters (19,810 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
 - b) This rule is not applied to T-6002 (EU0110) because Construction Permit #1295-011 limits the contents stored to 2,4 Dichlorophenoxyacetic Acid, 2-Ethylhexyl Ester, which has a maximum true vapor pressure below regulated levels.
 - c) This rule is not applied to the following storage tanks because they were manufactured prior to 1984.

Emission Point Description	Capacity (gallons)	Manufacture Date
T-601	35,261	1972
T-5101	30,496	1973
T-5102	30,496	1973
T-5203	34,308	1973
T-5214	30,496	1973

- d) This rule requires that the various records be kept for at least two (2) years. However, state operating permit regulations require records to be kept for a minimum of five (5) years.

- 4) 40 CFR Part 60 Subpart RRR, *Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes*
- a) This rule applies to each affected facility that is part of a process unit that produces any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate. The permittee does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate. Therefore, the permittee is not subject to this rule.

There are no other NSPS standards that apply.

Maximum Available Control Technology (MACT) Applicability

None

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

There are no other NESHAP standards that apply.

Other Regulatory Determinations

- 1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*
- a) The Solid Transfer or Dumping Operations. The process for transferring solids to the mix tanks is to hold the bags (super sacks) over the top of the tank with a lift and cut the bottom of the bag. The solids fall through a hopper attached to the top manway. A fabric filter is connected to the top of the tank, creating a slight negative pressure, and sucks dust into the tank where it is either consumed in the process or collected on the filter. 10 CSR 10-6.400 is not applied to the solid transfer or dumping operations at the facility because according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of particulate matter are exempt. The following table demonstrates that these units have the potential to emit less than 0.5 lb/hr. In addition, 10 CSR 10-6.220 is not applied to these units since it is highly unlikely that equipment that has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter would ever exceed the 20% opacity threshold required by this rule.

2008 EIQ EP #	Emission Point Description	Product	MHDR (ton/hr)	PM Emission Factor (lb/ton)	PTE (lb/hr)
EP-24-1	T-5353	2,4-D	5.4	0.024	0.130
EP-24-2	T-5355	Triclopyr	5.4	0.024	0.130
EP-68	R-2001	2,4-D + picrolam	5.4	0.024	0.130
EP-69	R-2002	Picrolam	5.4	0.024	0.130
EP-70	R-2401	2,4-D	5.4	0.024	0.130
EP-71	R-2402	Dicamba	5.4	0.024	0.130
EP-72	R-2403	2,4-D + Dicamba	5.4	0.024	0.130
EP-87	T-403	Trifluralin	2.75	0.024	0.066
EP-93	Hopper	MCPA	5.4	0.024	0.130
EP-98	T-601	Bromoxynil	2.1	0.024	0.050
EP-99	T-602	2,4-D	2.91	0.024	0.070
EP-100	T-603	Bromoxynil	2.1	0.024	0.050
EP-101	T-604	2,4-D + clopyralid	5.4	0.024	0.130
EP-102	T-605	Dicamba	2.65	0.024	0.064
EP-103	T-606	MCPA	5.4	0.024	0.130
EP-136	T-2501	PMDA	5.4	0.024	0.130
EP-137	T-2502	PMDA	5.4	0.024	0.130
EP-138	T-2503	Carbon	5.4	0.024	0.130
EP-172	T-2528	Glyphosate	5.4	0.024	0.130
EP-173	T-2529	Glyphosate	5.4	0.024	0.130
EP-215	T-2616	2,4-DB	5.4	0.024	0.130
EP-216	T-2617	Triclopyr	5.4	0.024	0.130
EP-217	T-2618	Fluroxypyr	5.4	0.024	0.130
EP-218	T-2619	Clopyralid	5.4	0.024	0.130
EP-219	T-2620	Dicamba	5.4	0.024	0.130
EP-226	T-2306	Imazethapyr	1.95	0.024	0.047
EP-227	T-2307	Imazethapyr	0.76	0.024	0.018
EP-228	T-2556	Glyphosate	5.4	0.024	0.130
EP-229	T-2557	Glyphosate	5.4	0.024	0.130

Note: A PM₁₀ emission factor of 0.012 lb/ton of material dumped was given in the Emissions/Control Evaluation Section of Construction Permit #032009-004. This emission factor was based on emissions testing conducted in 1995 at the St. Joseph facility. Since there are no PM emission factors available, it was assumed that PM = 2 x PM₁₀ (i.e. 2 x 0.012 = 0.024 lb/ton).

- 2) The following storage/mixing tanks and reactor have been removed from the facility and are not included in the operating permit:
- a) T-403 (EP-90) removed 2008
 - b) T-404 removed 2003
 - c) T-405 removed 2003

- d) T-406 removed 1998
 - e) R-402 removed 2001
 - f) R-403 removed 2001
 - g) T-701 removed 2001
 - h) T-702 removed 2001
 - i) T-703 removed 1998
 - j) T-704 removed 1998
 - k) T-705 removed 2007
 - l) T-2304 (EP-52) removed 2008
 - m) T-5205 (EP-24) removed 2001
- 3) The following solid transfer/dumping emission points have been removed from the facility and are not included in the operating permit:
- a) Dump station Esterification process (EP-95)
 - b) Dump station Dicamba salt mixing (EP-96)
 - c) Dump station (EP-97)

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:

Jason Dickneite
Environmental Engineer

CERTIFIED MAIL: 70073020000315697442
RETURN RECEIPT REQUESTED

Mr. Jim Kahnk
Albaugh, Inc.
4900 Packers Avenue
St. Joseph, MO 64504

Re: Albaugh, Inc., 021-0037
Permit Number: **OP2010-035**

Dear Mr. Kahnk:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Jason Dickneite at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/jdk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
Kansas City Regional Office
PAMS File: 2007-06-017