



PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2014-010
Expiration Date: MAY 28 2019
Installation ID: 157-0020
Project Number: 2011-12-041

Installation Name and Address

Atlas EPS, a Division of Atlas Roofing
911 Industrial Drive
Perryville, MO 63775
Perry County

Parent Company's Name and Address

Atlas Roof Corporation
802 Hwy 19 North, Suite 190
Meridian, MS 39307

Installation Description:

Atlas EPS, a Division of Atlas Roofing, is an expandable polystyrene (EPS) block mold manufacturer and fabricator. The installation also operates a painting operation for stenciling and other printing procedures.

The production of EPS molds starts with the pre-expansion of the polystyrene beads in a steam chamber. After being dried and allowed to cure in the curing silo, the pre-expanded beads are then fed into a block mold, where the beads are further heated by steam. The heat causes the beads to expand and fill the confines of the mold. The blocks then are allowed to cure before they are cut, grinded, and shipped to the customer.

The installation is a major source of VOC.

MAY 29 2014

Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
PERMIT CONDITION PW001	4
10 CSR 10-6.060 Construction Permits Required.....	4
Construction Permit 022011-002, Issued February 8, 2011	4
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	5
EP-27 – BOILER	5
PERMIT CONDITION 001	5
10 CSR 10-6.070 New Source Performance Regulations	5
40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.....	5
PERMIT CONDITION 002.....	5
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	5
40 CFR Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	5
IV. CORE PERMIT REQUIREMENTS	10
V. GENERAL PERMIT REQUIREMENTS.....	17
VI. ATTACHMENTS	22
ATTACHMENT A	23
VOC Tracking Record	23
ATTACHMENT B	24
Fugitive Emission Observations	24
ATTACHMENT C	25
Abbreviations and Acronyms.....	25

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Atlas EPS, a Division of Atlas Roofing, is an expandable polystyrene (EPS) block mold manufacturer and fabricator. The installation also operates a painting operation for stenciling and other printing procedures.

The production of EPS molds starts with the pre-expansion of the polystyrene beads in a steam chamber. After being dried and allowed to cure in the curing silo, the pre-expanded beads are then fed into a block mold, where the beads are further heated by steam. The heat causes the beads to expand and fill the confines of the mold. The blocks then are allowed to cure before they are cut, grinded, and shipped to the customer.

The installation is a major source of VOC.

The installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2; therefore, fugitive emissions are not counted toward major source applicability.

Reported Air Pollutant Emissions (tpy)					
Pollutants	2012	2011	2010	2009	2008
CO	1.99	2.32	1.82	1.77	2.28
NO _x	2.20	2.58	2.01	1.96	2.51
PM ₁₀	5.29	5.76	5.02	4.89	6.28
PM _{2.5}	4.92	-	-	-	-
SO _x	21.11	22.89	20.03	19.52	25.07
VOC	82.24	83.69	73.01	70.40	87.53
HAP	-	-	-	-	-

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. These emission sources are also subject to the plant wide emission limitations.

Emission Unit	Description	Applicable Requirements
27	Boiler - 10 MMBtu/hr wood	NSPS Dc, MACT JJJJJ, 10 CSR 10-6.260

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. These emission sources are subject to the plant wide emission limitations.

Emission Unit	Description
1	Boiler - 4.3 MMBtu/hr natural gas
5, 5A, 6A, 7, 7A, 7B, 7C, 24B, 25, 28, 31	EPS Bead Usage

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 022011-002, Issued February 8, 2011

Emission Limitation:

1. Special Condition 2.A: The permittee shall emit less than 250.0 tons of VOC in any consecutive 12-month period from the entire installation. This limit applies to the following VOC emissions sources:
 - a) EP-01 Boiler – 4.3 MMBtu/hr natural gas
 - b) EP-05 Bag Aging
 - c) EP-05A Bag Aging
 - d) EP-06A 16 ft Kurtz/Weiser Block Mold
 - e) EP-07 Kurtz 1014 Shape Mold
 - f) EP-07A Kurtz 1014 Shape Mold
 - g) EP-07B Shape Mold
 - h) EP-07C Shape Mold
 - i) EP-24B Kurtz VSD4600 Batch Expander
 - j) EP-25 Warehouse Aging
 - k) EP-27 Boiler – 10 MMBtu/hr wood
 - l) EP-28 Hirsch EPS Expander
 - m) EP-31 Block Mold

Monitoring/Recordkeeping:

1. Special Condition 2.B: The permittee shall use Attachment A or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the VOC emission limitation.
2. Special Condition 3.A: The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.

Reporting:

1. Special Condition 3.B: 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 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR and 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.

EP-27 – Boiler	
Emission Unit	Description
EP-27	Boiler – 10 MMBtu/hr wood

PERMIT CONDITION 001

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

Recordkeeping:

1. Except as provided under §60.48c(g)(2) and (3), the permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [§60.48c(g)(1)]
2. As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month. [§60.48c(g)(2)]
3. As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 002

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

Standards:

1. The permittee shall comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to MACT JJJJJ that applies. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to MACT JJJJJ satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. [§63.11201(b)]
2. These standards apply at all times the affected boiler is operating. [§63.11201(d)]

Table 2 to MACT JJJJJJ – Work Practice Standards, Emission Reduction Measures, and Management Practices

Boiler Type	Work Practice Standards, Emissions Reduction Measures, and Management Practices
Existing biomass-fired boilers that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.
Existing biomass-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment complete on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment shall include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:</p> <ul style="list-style-type: none"> (1) A visual inspection of the boiler system, (2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints, (3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the permittee (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage, (5) A list of major energy conservation measures that are within the facility's control, (6) A list of the energy savings potential of the energy conservations measures identified, and (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

General Requirements:

At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11205(a)]

Continuous Compliance:

1. The permittee shall conduct a performance tune-up according to §63.11223(b) and keep records as required in §63.11225(c) to demonstrate continuous compliance. The permittee shall conduct the

tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223(a)]

2. The permittee shall conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in §63.11223(b)(1) through (7). Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [§63.11223(b)]
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(1)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(3)]
 - d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [§63.11223(b)(4)]
 - e) Measure the concentrations in the effluent stream of CO in ppmv and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [§63.11223(b)(5)]
 - f) Maintain on-site and submit, if requested by the Administrator, a report containing the following information: [§63.11223(b)(6)]
 - i) The concentrations of CO in the effluent stream in ppmv and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
 - ii) A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]
 - iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [§63.11223(b)(6)(iii)]
 - g) If the unit is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 days of startup. [§63.11223(b)(7)]

General Provisions:

The permittee shall refer to Table 8 to MACT JJJJJ for 40 CFR Part 63, Subpart A applicability.

Notifications, Recordkeeping, and Reporting:

1. The permittee shall submit the following notifications to the administrator: [§63.11225(a)]
 - a) The permittee shall submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply by the dates specified in those sections except as specified in §63.11225(a)(4). [§63.11225(a)(1)]
 - b) The permittee shall submit the Notification of Compliance Status no later than 120 days after March 21, 2014. The permittee shall submit the Notification of Compliance Status in accordance

- with §63.11225(a)(4)(i) and (vi). The Notification of Compliance Status shall include the information and certification(s) of compliance in §63.11225(a)(4)(i) through (v), as applicable, and signed by a responsible official. [§63.11225(a)(4)]
- i) The permittee shall submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). [§63.11225(a)(4)(i)]
 - ii) “This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler.” [§63.11225(a)(4)(ii)]
 - iii) “This facility has had an energy assessment performed according to §63.11214(c).” [§63.11225(a)(4)(iii)]
 - iv) “No secondary materials that are solid waste were combusted in any affected unit.” [§63.11225(a)(4)(v)]
 - v) The notification shall be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to MACT JJJJJ is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status shall be submitted to the Administrator at the appropriate address listed in §63.13. [§63.11225(a)(4)(vi)]
2. The permittee shall prepare, by March 1 of every other year, and submit to the delegated authority upon request, a compliance certification report for the previous two calendar years containing the information specified in §63.11225(b)(1) through (3). The permittee shall submit the report by March 15 if the permittee had any instance described by §63.11225(b)(3). [§63.11225(b)]
- a) Company name and address. [§63.11225(b)(1)]
 - b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of MACT JJJJJ. The notification shall include the following certification(s) of compliance, as applicable, and signed by a responsible official: [§63.11225(b)(2)]
 - i) “This facility complies with the requirements in §63.11223 to conduct a biennial tune-up of each boiler.” [§63.11225(b)(2)(i)]
 - ii) “No secondary materials that are solid waste were combusted in any affected unit.” [§63.11225(b)(2)(ii)]
 - c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [§63.11225(b)(3)]
3. The permittee shall maintain the following records: [§63.11225(c)]
- a) As required in §63.10(b)(2)(xiv), the permittee shall keep a copy of each notification and report that the permittee submitted to comply with MACT JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. [§63.11225(c)(1)]
 - b) The permittee shall keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in §63.11225(c)(2)(i) and (iii). [§63.11225(c)(2)]
 - i) Records shall identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [§63.11225(c)(2)(i)]
 - ii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report. [§63.11225(c)(2)(iii)]

- c) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [§63.11225(c)(4)]
- d) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [§63.11225(c)(5)]
- e) Records shall be in a form suitable and readily available for expeditious review. The permittee shall keep each record for five years following the date of each recorded action. The permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least two years after the date of each recorded action. The permittee may keep the records off site for the remaining three years. [§63.11225(c)(6)]
4. If the permittee intends to commence or recommence combustion of solid waste, the permittee shall provide 30 days prior notice of the date upon which the permittee will commence or recommence combustion of solid waste. The notification shall identify the information in §63.11225(f)(1) through (4). [§63.11225(f)]
5. If the permittee switches fuels or makes a physical change to the boiler and the fuel switch or change results in the applicability of a different subcategory within MACT JJJJJ or in the boiler switching out of MACT JJJJJ due to a change to 100 percent natural gas, the permittee shall provide notice of the date upon which the boiler switched fuels or made the physical change within 30 days of the change. The notification shall identify the information in §63.11225(g)(1) and (2). [§63.11225(g)]
6. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

1. General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.
 - b) Yard waste.
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 permittee fails to comply with the conditions or any provisions of the permit.
4. Atlas EPS, a Division of Atlas Roofing 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 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 Atlas EPS, a Division of Atlas Roofing 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(2)(N)11, the director shall not issue a permit under this section unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Recordkeeping. NSPS CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of NSPS 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 CCCC, 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 NSPS Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of NSPS Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

1. In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under §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 §§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 §§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 18 months. [10 CSR 10-

6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

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

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

1. The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on EIQ paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2. The permittee may be required by the director to file additional reports.
3. Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
4. The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. §643.079.
5. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
6. The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
7. The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
8. The permittee shall collect, record, and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170 Restriction of PM 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 PM 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 PM 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 PM 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:

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

Recordkeeping:

1. The permittee shall document all readings on Attachment B, or an equivalent form approved by the Air Pollution Control Program, noting the following:
 - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
 - b) Whether equipment malfunctions contributed to an exceedance.
 - c) 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 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

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 Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the 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 40 CFR Part 82, Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A - Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B - Servicing of MVACs. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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 promulgated pursuant to 40 CFR Part 82, Subpart G - Significant New Alternatives Policy Program. *Federally enforceable only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

- c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

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

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

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

1. Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2. Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or 40 CFR Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in 10 CSR 10-6.065(6)(C)7.A 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 semi-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(6)(C)1.D Risk Management Plan Under §112(r)

1. 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 §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:
 - a) June 21, 1999;
 - b) Three years after the date on which a regulated substance is first listed under §68.130; or
 - c) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

1. The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2. The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3. The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4. This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5. The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

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

1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3. All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4. The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;

- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

1. An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not

previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

2. §502(b)(10) changes. Changes that, under §502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, the permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

1. Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)39 Responsible Official

The application utilized in the preparation of this permit was signed by William J. Calla, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the permittee 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 permittee to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

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

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

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

VI. Attachments

Attachments follow. Attachment C contains a list of abbreviations and acronyms used throughout this permit.

Attachment A
VOC Tracking Record

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

Emission Unit	Description	Monthly Amount Processed	VOC Emission Factor	Monthly VOC Emissions¹ (tons)
5, 5A, 6A, 7, 7A, 7B, 7C, 24B, 25, 28, and 31	EPS Bead Usage	tons	120 lb/ton	
1	Natural Gas Boiler	3.05 MMscf	5.5 lb/MMscf	0.01
27	Wood Boiler	703.72 tons	0.0572 lb/ton	0.02
Total Monthly VOC Emissions² (tons):				
12-Month Rolling Total VOC Emissions³ (tons):				

¹Monthly VOC Emissions (tons) from EPS Bead Usage = Amount of EPS Beads Processed this Month (tons) x 120 x 0.0005.

²Total Monthly VOC Emissions = Monthly VOC Emissions from EPS Bead Usage (tons) + 0.01 + 0.02.

³12-Month Rolling Total VOC Emissions (tons) = the sum of the 12 most recent month's Total Monthly VOC Emissions (tons). 12-Month Rolling Total VOC Emissions of less than 250.0 tons indicates compliance with Permit Condition PW001.

Attachment C
Abbreviations and Acronyms

°Cdegrees Celsius	m/s meters per second
°F degrees Fahrenheit	mgmilligrams
AAQIA ambient air quality impact analysis	Mgal 1,000 gallons
acfm actual cubic feet per minute	MW megawatt
BACT Best Available Control Technology	MHDR maximum hourly design rate
BMPs Best Management Practices	MMBtu Million British thermal units
Btu British thermal unit	mmHgmillimeters mercury
CAM Compliance Assurance Monitoring	MMscf Million standard cubic feet
CAS Chemical Abstracts Service	MSDS Material Safety Data Sheet
CEMS Continuous Emission Monitor System	NAAQS National Ambient Air Quality Standards
CFR Code of Federal Regulations	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CO carbon monoxide	NO_x nitrogen oxides
CO₂ carbon dioxide	NSPS New Source Performance Standards
CO₂e carbon dioxide equivalent	NSR New Source Review
COMS Continuous Opacity Monitoring System	PM particulate matter
CSR Code of State Regulations	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
dscf dry standard cubic feet	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
dscmdry standard cubic meter	ppm parts per million
EIQ Emission Inventory Questionnaire	PSD Prevention of Significant Deterioration
EP Emission Point	psipounds per square inch
EPA Environmental Protection Agency	PTE potential to emit
EU Emission Unit	RACT Reasonable Available Control Technology
FGD flue gas desulfurization	RAL Risk Assessment Level
FIREEPA's Factor Information Retrieval System	SCC Source Classification Code
fps feet per second	scfm standard cubic feet per minute
ft feet	SCR selective catalytic reduction
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAP Hazardous Air Pollutant	tph tons per hour
hr hour	tpy tons per year
HP horsepower	VMT vehicle miles traveled
lb pound	VOC Volatile Organic Compound
lb/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	

STATEMENT OF BASIS

Permit Reference Documents

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

1. Part 70 Operating Permit Application, received December 15, 2011
2. 2012, 2011, 2010, 2009, and 2008 EIQs
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
4. Construction Permit 0187-006
5. Construction Permit 0388-004
6. Construction Permit 1289-006
7. Construction Permit 0695-003
8. Construction Permit 0995-016
9. Construction Permit 0696-005
10. Construction Permit 012002-012
11. Construction Permit 082003-006
12. Construction Permit 112004-002
13. Construction Permit 022011-002

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits* is not applicable and has not been applied within this permit. This regulation is not applicable as the installation is located in an ozone attainment area.

Construction Permits

Permit Number	Description	Notes
0187-006	To construct a facility for the production of Styrofoam packaging materials and Styrofoam insulation using expanded polystyrene	No special conditions
0388-004	Expansion of expanded polystyrene production and installation of a 3.57 MMBtu/hr boiler	EPS bead usage records already required as part of 022011-002 plant wide VOC limit
1289-006	Installation of two LPG storage tanks with a capacity 1,000 gallons each.	The plant wide VOC limit of 022011-002 superseded this plant wide EPS bead usage limit
0695-003	Installation of a second Hirsch pre-expander	The plant wide VOC limit of 022011-002 superseded this plant wide VOC limit
0995-016	Replacement of Wieser Block Mold, Hirsch 6,000 Batch Expander, V-200 Pre-Expander, and V-300 Pre-Expander with a Monoflex V Block Mold, and VSD 4,600 Batch Expander	Superseded by 012002-012
0696-005	Installation of a 300 HP wood gasification boiler to replace 75 and 125 HP natural gas fired boilers	No special conditions

012002-012	Addition of new expanding, molding, and curing equipment	Supersedes 0995-016
082003-006	Addition of a new embossing line	Supersedes 012002-012
112004-002	Installation of a Hirsch expandable polystyrene expander	Supersedes 082003-006
022011-002	Installation of an additional block mold (EP-31)	Special Condition 1 supersedes 112004-002 Special Conditions 2 – 3 included in Permit Condition PW001 Special Condition 4 required removal of EP-06, EP-23, EP-24, EP-30, and EP-42 and has been completed

NSPS Applicability

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is applicable to EP-27 Boiler and has been applied within this permit (see Permit Condition 001). This regulation does not apply to EP-01 Boiler as the boiler has a heat input below 10 MMBtu/hr and does not meet the applicability requirements of §60.40c(a).

MACT Applicability

40 CFR Part 63, Subpart JJJ – *National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins* is not applicable to the installation and has not been applied within this permit. The installation purchases EPS beads, as no production of EPS beads occurs onsite, the installation is does not meet the applicability requirements of §63.1310.

40 CFR Part 63, Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* is applicable to EP-27 Boiler and has been applied within this permit (see Permit Condition 002). This regulation does not apply to EP-01 Boiler as §63.11195(e) exempts gas-fired boilers.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Greenhouse Gas Emissions

This installation is a minor source for greenhouse gases.

Ownership History

The installation 157-0020 was initially permitted by NPS Corp. In 2001 the installation became Falcon Foam. In 2010, the installation became Atlas EPS.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons per year) ¹
CO	27.91
CO ₂ e	2,199.95
NO _x	11.50
PM ₁₀	23.36
PM ₂₅	13.82
SO _x	1.11
VOC	<250.0
HAP	0.03

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted:

- Construction Permit 022011-002 limited emission points 1, 5, 5A, 6A, 7, 7A, 7B, 7C, 24B, 25, 27, 28, and 31 to 250.0 tons per year of VOC. The installation has no other VOC emission sources; therefore, this emission limit effectively limits the entire installation to 250.0 tons per year of VOC.

Other Regulatory Determinations

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to EP-01 Boiler, but has not been applied within this permit.

- EP-01 combusts natural gas and has potential emissions of only 0.03 lb/hr PM₁₀; therefore, no monitoring, recordkeeping, or reporting is being required for EP-01 at this time.
- EP-27 Boiler is not subject to this regulation as 10 CSR 10-6.220(1)(H) exempts emission sources regulated by an NSPS (see Permit Condition 001).

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is applicable to EP-27 Boiler, but has not been applied within this permit.

- For EP-27 Boiler, AP-42 Table 1.6-2 indicates an SO₂ emission factor of 0.025 lb/MMBtu which is less than the 8 lb/MMBtu limit of 10 CSR 10-6.260(3)(B)2.A; therefore, the boiler is inherently compliant with this regulation and no further monitoring, recordkeeping, or reporting is necessary.
- EP-01 Boiler is not subject to this regulation as 10 CSR 10-6.260(1)(A)2 exempts combustion equipment that uses exclusively pipeline grade natural gas.

10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is applicable to EP-01 and EP-27 Boilers, but has not been applied within this permit. 10 CSR 10-6.405(1)(C) states that an emission unit that is subject to an NSPS (see Permit Condition 001) or that combusts natural gas is deemed in compliance with 10 CSR 10-6.405; therefore, no monitoring, recordkeeping, or reporting is required at this time.

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).

Response to Public Comments

The draft Part 70 Operating Permit for Atlas EPS, a Division of Atlas Roofing (Project 2011-12-041, County-Plant ID: 157-0020) was placed on public notice as of April 7, 2014, for a 30-day comment period. The public notice was published on the Department's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on Monday, April 7, 2014. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.

Prepared by:

Alana L. Rugen, P.E.
Environmental Engineer III

Mr. William J. Calla
Atlas EPS, a Division of Atlas Roofing
911 Industrial Drive
Perryville, MO 63775

Re: Atlas EPS, a Division of Atlas Roofing, 157-0020
Permit Number: **OP2014-010**

Dear Mr. Calla:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:ark

Enclosures

c: Southeast Regional Office
PAMS File: 2011-12-041