



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2012-034
Expiration Date: AUG 23 2017
Installation ID: 109-0004
Project Number: 2011-11-015

Installation Name and Address

BCP Ingredients, Inc.
299 Extension St.
Verona, MO 65769
Lawrence County

Parent Company's Name and Address

Balchem Corporation
52 Sunrise Park Rd
New Hampton, NY 10973

Installation Description:

The BCP Ingredients' Verona, Missouri plant manufactures food and feed grade preservatives and nutritional additives including choline salts, ethylene oxide repackaging and specialty chemicals. The facility is a major source of sulfur oxides (SO_x). The installation is subject to 40 CFR Part 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* and 40 CFR Part 63 Subpart CCCCCC, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*.

AUG 24 2012

Effective Date


Director of Designee

Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

BCP Ingredients, Inc. (BCPI) is located in Verona, Missouri and manufactures feed and food-grade nutritional additives. The manufacturing processes involve acid-base reactions and the resulting salts are either sold in liquid form or they are concentrated, purified and dried. A variety of chemical compounds are also produced including choline salts, clay stabilization products, and specialty chemicals.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	5.32	5.01	4.70	5.10	4.70
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.00	0.00	0.00	0.00	0.00
Sulfur Oxides (SO _x)	0.16	0.02	0.027	0.030	0.027
Nitrogen Oxides (NO _x)	4.52	3.81	6.39	6.70	6.24
Volatile Organic Compounds(VOC)	66.10	50.53	47.45	1.88	1.45
Carbon Monoxide (CO)	3.77	3.18	1.61	1.69	1.57
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	8.93	9.28	176.80	303.35	43.80
Ammonia (NH ₃)	0.00	0.00	0.00	0.00	0.00

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EP 3-1	Mixer with cent collector
EP 3-2	Direct fired natural gas product dryer
EP 3-3	Sack weight hopper with cyclone
EP 3-8	Weigh bin with baghouse
EP 3-9	Aqueous storage tanks and preheater vent
EP 3-10	Rework auger vent
EP 3-11	Cooler vent
EP 3-12	Hopper with fabric filter
EP 3-13	Sack packaging vent
EP 5-1	Boiler #1, 27 MMBtu/hr
EP 5-2	Boiler #2, 29 MMBtu/hr
EP 5-8	Gasoline tank used for fueling
EP 5-14	Electric generator engine rated 211 kW
EP 5-15	380 hp firewater pump engine
EP 9-1	Weighing, charging, blending, encapsulating, and packing activities
EP 10-1	Ethylene Oxide Scrubber
EP 10-2	Heil Scrubber Stack
EP 10-3	V-10 Vent Header
EP 11-5	Heil Scrubber, HCl Scrubber, and KOH Scrubber
EP 13-1	V-13 Vacuum vent and classifier dust collector
EP 13-2	Material Processing and Handling for Choline Salts in V-13
EP 16-1	Surge bins, feed augers, feeders, bulk sack loadout, particle shaper, super sack filling, and vibratory screen
EP 16-2	Bag dump station
EP 16-7	Fluid bed dryer/cooler
EP 16-8	Particle shaper
EP 25-1	Liquid/Gas Repackaging Stations

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Building V-3

- 6 Cob Silo Vents with Baghouses (EP 3-4)
- Dry Choline Bulk Tank with Fabric Filter (EP 3-7)
- Bulk Loadout Vent (EP 3-14)

Building V-5

- Fuel Oil Storage Tank (EP 5-5)
- Propane Tank Fugitives (EP 5-9)
- Gasoline Vehicle Refuel (EP 5-11)
- Fuel Oil Refuel Tanks (EP 5-12)
- Fuel Oil Vehicle Refuel (EP 5-13)

Building V-8

- 3 HCl Tanks with HCl Scrubber (EP 8-2)
- Mixing Tanks (EP 8-3)
- Storage Tank (EP 8-4)
- Fugitive Emissions (EP 8-5)
- Hold Tanks (EP 8-6)
- Receiver (EP 8-7)

Building V-11

- Alcohol Storage Tank (EP 11-1)
- Recovered Alcohol Storage Tank (EP 11-2)
- Mixer/Packaging (EP 11-3)-out of service
- SS-2005 Tank Vent (EP 11-6)
- SS-2006 Post Condenser Vent (EP 11-8) - out of service
- SS-2006 Receiver Vent (EP 11-9) – out of service
- TAOS Storage Tank #1 (EP 11-10) – out of service
- TAOS Storage Tank #2 (EP 11-11) – out of service
- Fugitive Emissions (EP 11-12)
- Methyl Chloride Storage Tank (EP 11-16)

Building V-14

- Solvent Recover (EP 14-1)
- 3 Solvent Tanks (EP 14-2, 14-3, 14-4)
- Solvent Receivers (EP 14-5, 14-6, 14-7)

Building V-20

- Settling Tank (EP 20-1)
- Loadout Tank (EP 20-2)
- Storage Tank (EP 20-3)

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

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

Emission Limitation

The permittee shall emit less than ten tons of any individual hazardous air pollutant (HAP) and less than 25 tons of any combination of HAPs in any consecutive twelve month period.

Monitoring/Recordkeeping

1. The permittee shall maintain an accurate record of HAP emissions. Attachments K and L or their equivalents shall be used to demonstrate compliance with the emission limit.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION PW002

10 CSR 10-6.060, Construction Permits Required
Construction Permit 012008-012, Issued January 29, 2008

Emission Limitations

The permittee shall emit less than 250 tons of VOCs in any consecutive 12-month period from the entire installation. (Special Condition 2A)

Operational Limitations

All tanks or containers of alcohol shall be tightly closed at all times except during fill operations. (Special Condition 4A)

Monitoring/Recordkeeping

1. Attachment J or an equivalent form approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2A. (Special Condition 3A)
2. The permittee may use electronic recordkeeping in lieu of the Attachments. The electronic records shall be easily reproduced in paper form and verification of compliance with the limits set forth in

Special Condition 2 shall be easily understood. The electronic forms shall include a minimum of company name, Plant ID No., Project No., Attachment Heading and emission calculations. (Special Condition 3B)

3. The permittee 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 used at this facility. (Special Condition 3A)

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition 3.A or B indicate that the source exceeds the limitation of Special Conditions 2A. (Special Condition 3C)
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting 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 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.

Dry Choline Chloride Production		
Emission Unit	Description	Building
EP 3-1	Mixer with cent collector	V-3
EP 3-2	Direct fired natural gas product dryer. Connected to a centrifugal collector with medium efficiency. Installed 1965	V-3
EP 3-3	Sack weight hopper with cyclone	V-3
EP 3-8	Weigh bin	V-3
EP 3-9	Aqueous storage tanks and preheater vent	V-3
EP 3-10	Rework auger vent	V-3
EP 3-11	Cooler vent	V-3
EP 3-12	Hopper with fabric filter	V-3
EP 3-13	Sack packaging vent	V-3
EP 10-1	Ethylene Oxide (EO) Scrubber - wet scrubber for various EO handling equipment throughout the plant site	V-10
EP 10-2	Heil Scrubber Stack	V-10
EP 10-3	Building V-10 Vent Header	V-10
EP 13-2	Materials Processing and Handling for Choline Salts in V-13	V-13

PERMIT CONDITION 001

10 CSR 10-6.060, Construction Permits Required
 Construction Permit 012008-012, Issued January 29, 2008

Emission Limitation

1. The permittee shall emit less than 17.9 tons of particulate matter less than ten microns (PM₁₀) in any consecutive 12-month period from the equipment in Building V-3 and Building V-13 listed in the table above. (Special Condition 2C)
2. The permittee shall emit less than 0.32 tons of ethylene oxide (EO) in any consecutive 12-month period from the following emission points: EP 3-2 and the equipment in building V-10. (Special Condition 2B)

Operational Limitation

1. The cyclone controlling emissions from EP3-2 must be in use at all times when the equipment associated with this emission point is in operation. The cyclone shall be operated and maintained in accordance with the manufacturer's specifications. (Special Condition 4C)
2. The vacuum system and seals associated with the equipment in building V-10 shall be maintained and kept in good working order. (Special Condition 4B)

Recordkeeping

1. Attachments M and N or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitation. (Special Condition 3A)
2. The permittee may use electronic recordkeeping in lieu of the Attachments. The electronic records shall be easily reproduced in paper form and verification of compliance with the limits set forth in Special Condition 2 shall be easily understood. The electronic forms shall include a minimum of company name, Plant ID No., Project No., Attachment Heading and emission calculations. (Special Condition 3B)
3. The permittee 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 the Material Safety Data Sheets (MSDS) for all materials at this facility. (Special Condition 3A)

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition 3 A or B indicate that the source exceeds the limitation of Special Conditions 2A. (Special Condition 3C)
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION (EP 10-1)-001

10 CSR 10-6.060, Construction Permits Required
Construction Permit 012008-012, Issued January 29, 2008

Operational Limitation

The ethylene oxide (EO) Scrubber (EP10-1) must be in use at all times when the associated equipment is in operation. (Special Condition 4D)

Monitoring/Recordkeeping

1. The permittee shall inspect the EO scrubber (EP 10-1) at least once every six (6) months and at a minimum conduct the following activities: (Special Condition 4D)
 - a) Inspect all components of the control system that are subject to wear or plugging, including structural components, housing, ducts, hoods, etc.; and
 - b) If leaks or abnormal conditions are found during these inspections, the appropriate remedial actions shall be implemented before re-starting the equipment.
2. The permittee shall maintain an operating, maintenance and inspection log for the wet scrubber which shall include the following: (Special Condition 4D)
 - a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on emissions due to the malfunction;
 - b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.; and
 - c) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection.

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

Boilers		
Emission Unit	Description	Building
EP 5-1	Boiler #1- 27 MMBtu/hr (natural gas/distillate oil). Installed 1961.	V-5
EP 5-2	Boiler #2- 29 MMBtu/hr (natural gas/distillate oil). Installed 1965	V-5

PERMIT CONDITION (EP 5-1 through EP 5-2)-001
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Emission Limitations

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **existing** source visible emissions with an opacity greater than 40 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting

As detailed in core permit requirements.

PERMIT CONDITION (EP 5-1 through EP 5-2)-002
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

Emission Limitation

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

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

Operational Limitation/Equipment Specifications

The emission unit shall be limited to burning pipeline grade natural gas or No. 2 fuel oil.

Monitoring/Recordkeeping

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

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION (EP 5-1 through EP 5-2)-003

10 CSR 10-3.060, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating¹

¹This requirement is federally enforceable only.

Emission Limitation

The permittee shall not emit particulate matter in excess of 0.45 lb/MMBtu of heat input from any existing indirect heating sources.

Operational Limitation

The permittee shall calibrate, maintain and operate the emission unit according to the manufacturer's specifications and recommendations.

Monitoring/Recordkeeping

1. Attachment P contains calculations which demonstrate that this emission unit will never exceed the emission limitation while burning the specified fuel.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting

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

Gasoline Tank		
Emission Unit	Description	Manufacturer/Model#
EP 5-8	Gasoline tank used for fueling with a maximum usage of 2,000 gallons per year	Unknown

PERMIT CONDITION (EP 5-8)-001

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart A General Provisions
40 CFR Part 63, Subpart CCCCC National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

Management Practices

1. You must, at all times, 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. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which 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. [§63.11115(a)]
2. You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)]
 - a) Minimize gasoline spills; [§63.11116(a)(1)]
 - b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(3)]
 - i. Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F, are considered acceptable for compliance this condition. [§63.11116(d)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11116(a)(4)]

Recordkeeping/Reporting

There is no requirement to submit notifications or reports as specified in §63.11125, §63.11126, or Subpart A of 40 CFR Part 63, but records must be made available within 24 hours of a request by the Director to document gasoline throughput. [§63.11116(b)]

Emergency Engines		
Emission Unit	Description	Manufacturer/Model #
EP 5-14	305 hp, diesel fired, compression ignition, emergency electric generator engine. Installed pre-2006	Caterpillar/SR-4
EP 5-15	380 hp, diesel fired, compression ignition, firewater pump engine attached to large water reservoir and piped to facility sprinkler heads. Installed pre-2006	Unknown

PERMIT CONDITION (EP 5-14 through EP 5-15)-001

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart A General Provisions
40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Initial Compliance Requirements

If you have an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)(1)]

Emissions and Operating Limitations

You must comply with the requirements in Table 2d (Attachment E) that apply to you. [§63.6603(a)]

General Compliance Requirements

1. You must be in compliance with the emission limitations and operating limitations that apply to you at all times.[§63.6605(a)]
2. At all times you must 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 you 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 Director which 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. [§63.6605(b)]

Monitoring/Installation/Collection/Operation/Maintenance Requirements

1. You must operate and maintain your existing emergency stationary RICE located at an area source of HAP emissions and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)(3)]
2. You must install a non-resettable hour meter if one is not already installed. [§63.6625(f)]

3. You must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d (Attachment E) apply. [§63.6625(h)]
4. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d (Attachment E). The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d (Attachment E). The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within two days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within two days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [§63.6625(i)]

Continuous Compliance Requirements

1. Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, you must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§63.6635(b)]
2. You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must, however, use all the valid data collected during all other periods. [§63.6635(c)]
3. You must demonstrate continuous compliance with each emission limitation and operating limitation in Table 2d (Attachment E) that apply to you according to methods specified in Table 6 (Attachment F). [§63.6640(a)]
4. You must report each instance in which you did not meet each emission limitation or operating limitation in Table 2d (Attachment E) that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]
5. You must also report each instance in which you did not meet the requirements in Table 8 (Attachment G) that apply to you [§63.6640(e)]
6. If you own or operate an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (a) through (c) below. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) through (c) below, is prohibited. If you do not operate the engine according to the requirements in paragraphs (a) through (c) below, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines. [§63.6640(f)(1)]

- a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)(i)]
- b) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. [§63.6640(f)(1)(ii)]
- c) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (c), as long as the power provided by the financial arrangement is limited to emergency power. [§63.6640(f)(1)(iii)]

Recordkeeping

1. The permittee shall keep a copy of each notification and report submitted to comply with this subpart. [§63.6655(a)(1)]
2. The permittee shall keep records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
3. The permittee shall keep records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
4. The permittee shall keep records of actions taken during periods of malfunction to minimize emissions in accordance with General Compliance Requirement 2, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
6. You must keep the records required in Table 6 (Attachment F) to show continuous compliance with each emission or operating limitation that applies to you. [§63.6655(d)]
7. You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. [§63.6655(e)]
8. You must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are

spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [§63.6655(f)]

9. Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
10. As specified in §63.10(b)(1), you must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
11. You must keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION (EP 5-14 through EP 5-15)-002

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

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

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.03 parts per million (ppm) (80 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$))	Annual arithmetic mean
	0.14 ppm (365 $\mu\text{g}/\text{m}^3$)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu\text{g}/\text{m}^3$)	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 $\mu\text{g}/\text{m}^3$)	1/2-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu\text{g}/\text{m}^3$)	1/2-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 $\mu\text{g}/\text{m}^3$	24-hour average not to be exceeded more than once in any 90 consecutive days

Operational Limitation/Equipment Specifications

The emission unit shall be limited to burning No. 2 fuel oil.

Monitoring/Recordkeeping

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

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

Encapsulation Process		
Emission Unit	Description	Building
EP 9-1	Weighing, charging, blending, encapsulating, and packing activities attached to a fabric filter. Installed 2002.	V-9

PERMIT CONDITION (EP 9-1)-001

10 CSR 10-6.060, Construction Permits Required
Construction Permit 012002-009, Issued December 14, 2001

Emission and Operation Limitations

1. The permittee shall not emit volatile organic compounds (VOCs) from the encapsulation process (EP 9-1) in excess of 40 tons in any consecutive 12-month period. (Special Condition 1)
2. The permittee shall control emissions from the encapsulation process (EP 9-1) using dust collectors as specified in the permit application. The dust collectors shall be operated and maintained in accordance with the manufacturer's specifications. The dust collectors shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for the dust collectors shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). (Special Condition 7)

Monitoring and Recordkeeping

1. Attachment I or equivalent form approved by the Air Pollution Control Program (APCP) shall be used for recordkeeping. BCP Ingredients 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. (Special Condition 2)
2. The permittee shall monitor and record the operating pressure drop across the dust collectors at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. (Special Condition 8)
3. The permittee shall maintain an operating and maintenance log for the dust collectors which shall include: (Special Condition 9)
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition 2 indicate that the source exceeds the limitations in Special Condition 1. (Special Condition 3)

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

TMAC Scrubbers		
Emission Unit	Description	Building
EP 11-5	Heil Scrubber, HCl Scrubber, and KOH Scrubber	V-11

PERMIT CONDITION (EP 11-5)-001

10 CSR 10-6.060, Construction Permits Required
Construction Permit 012008-012, Issued January 29, 2008

Operational Limitation

The Heil Scrubber, Hydrogen Chloride (HCl) Scrubber, and Potassium Hydroxide (KOH) Scrubber (EP 11-5) shall be operated at all times during air contaminant releases from the reaction vessel and scrubbers, and each scrubber shall be operated and maintained according to the design specifications for each scrubber. The emissions from the primary reactor shall be routed to the Heil Scrubber then the HCl Scrubber and finally to the KOH Scrubber to remove any acid mist and unreacted tetramethyl amine (TMA). (Special Condition 4E)

Monitoring

In the production building for V-11, the pH of both the acid scrubbing waters for the secondary acid scrubber and the caustic scrubbing waters for the secondary caustic scrubber shall be monitored at minimum during the beginning of the batch production and immediately prior to venting any air contaminants from the reaction vessel. (Special Condition 4F)

Recordkeeping

- The pH in addition to the time shall be recorded at least once per batch cycle at these locations. The scrubbing waters shall be maintained at a pH value of less than one (1) for the secondary hydrochloric acid scrubber, and greater than 13 for the secondary potassium hydroxide caustic scrubber. (Special Condition 4F)
- The permittee shall monitor and record the quantities of deionized water and TMA for every production batch of trimethyl ammonium chloride (TMAC). The quantities shall be maintained within the design conditions specified by the manufacturer; and maintain calculations showing the minimum TMA required in the scrubber solution during every production batch of TMAC. The TMA shall be in molar excess to control emissions from the reactor. (Special Condition 4G)
- The records shall be kept for at least five (5) years and shall be made readily available upon request to the Department of Natural Resources employees. (Special Condition 4F)

Reporting

- The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
- The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

V-13 Vent and Scrubber		
Emission Unit	Description	Building
EP 13-1	V-13 Vacuum vent and classifier dust collector. Installed 2002	V-13

PERMIT CONDITION (EP 13-1)-001
 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Emission Limitations

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting

As detailed in core permit requirements.

Handling Equipment		
Emission Unit	Description	Building
EP 16-1	Surge bins, feed augers, feeders, bulk sack loadout, particle shaper, super sack filling, and vibratory screen	V-16
EP 16-2	Bag dump station	V-16
EP 16-7	Fluid bed dryer/cooler	V-16
EP 16-8	Particle shaper	V-16

PERMIT CONDITION (EP 16-1 through EP 16-8)-001
 10 CSR 10-6.060, Construction Permits Required
 Construction Permit 122010-009A, Issued November 28, 2011

Operational Limitation

1. The permittee shall control emissions from this equipment using cartridge filters or baghouses as specified in the construction permit application. (Special Condition 2A)
2. The cartridge filters and baghouses shall be operated and maintained in accordance with the manufacturer's specifications. Pressure drop shall be used as an indicator of the proper operation of the control device. (Special Condition 2B)
3. The permittee shall use one of the following on each cartridge filter or baghouse to ensure proper operation of the control device. (Special Condition 2B)
 - a) A differential pressure switch with an audible alarm that indicates operation of the unit outside of the manufacturer's design specifications whenever the device is in operation. An alarm indicates a decrease in efficiency of the control device and corrective action shall be implemented and documented as described in Special Condition 2D.
 - b) A pressure gauge or meter that indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' personnel may

easily observe them. The permittee shall monitor and record the operating pressure drop across the device at least once every twenty-four (24) hours when the device is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

4. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). (Special Condition 2C)

Recordkeeping

1. The permittee shall maintain an operating and maintenance log for the filters which shall include the following: (Special Condition 2D)
 - a) Incidents of malfunction, with impacts on emissions, duration of event, probable cause and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions and replacements, etc.
2. The permittee shall maintain all records 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 used. (Special Condition 3A)

Reporting

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required shows an exceedance of a limitation imposed. (Special Condition 3B)
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

<p align="center">PERMIT CONDITION (EP 16-7)-002</p>

<p>10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants</p>

Emission Limitations

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting

As detailed in core permit requirements.

Liquid/Gas Repackaging Stations		
Emission Unit	Description	Building
EP 25-1	Liquid/Gas Repackaging Stations, including two (2) storage tanks, blending/packaging stations, and vapor liquid recovery	V-25

PERMIT CONDITION (EP 25-1)-001

10 CSR 10-6.060, Construction Permits Required
Construction Permit 032002-023, Issued March 27, 2002

Monitoring

1. Each calendar month, the ethylene oxide system shall be inspected for emission leaks. Should results indicate a leak, the facility shall take necessary actions to remedy the causes of any such leaks and restore the operation of the system to its original performance level.
2. Detected leaks shall be clearly marked with a weatherproof and readily visible identification, which includes the equipment identification number. Identification shall remain in place until the leak is repaired.

Recordkeeping

A record of each monthly inspection shall be kept at the site for at least two (2) years. Attachment O or another similar log created by the facility shall be used to comply with this condition.

Reporting

1. If the presence of ethylene oxide in the ambient air exists in quantities and durations that directly or proximately cause or contribute to injury to human, plant, or animal life or health, or to property, or that unreasonably interferes with the enjoyment of life or the use of property, the Director may require BCP Ingredients to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the emission of ethylene oxide. BCP Ingredients shall implement any such plan immediately upon its approval to the Director. Failure to either submit or implement such a plan shall be a violation of the permit.
2. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
3. The permittee shall report any deviations from the standards, monitoring/testing, and reporting 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 Code of Federal Regulations (CFR), the 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 as of the date that this permit is issued. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

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

City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) BCP Ingredients, 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 BCP Ingredients, 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 Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall 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 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 10-6.165 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 10-6.220 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:

- 1) The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units;
 - b) All emission units from which visible emissions occurred;
 - c) Whether the visible emissions were normal for the process;
 - d) The permittee shall maintain records of any equipment malfunctions (see Attachment D), which may contribute to visible emissions; and,
 - e) The permittee shall maintain records of all USEPA Method 9 (see Attachment C) opacity tests performed.
- 2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for five years.

Reporting

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section P.O. Box 176, Jefferson City, MO, 65102, no later than 10 days after the end of the month during which the source exceeds the emission limitations above.
- 2) The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.

- c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

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

- b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065(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 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 Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's 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 Section 112(r)

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

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

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

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

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

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

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program 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 Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

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

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

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

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

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

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program 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 notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

- d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Jerome Freiburger, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment C

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

Readings ranged from _____ to _____ % opacity.

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

Attachment E

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

As stated in §§63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each . . .	You must meet the following requirement, except during periods of startup . . .
Emergency stationary CI RICE ²	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

¹Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

²If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

Attachment F

Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance with Emission Limitations, Operating Limitations, Work Practices, and Management Practices

As stated in §63.6640, you must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
Existing emergency stationary RICE located at an area source of HAP	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Attachment G

Table 8 to Subpart ZZZZ of Part 63—Applicability of General Provisions to Subpart ZZZZ.

As stated in §63.6665, you must comply with the following applicable general provisions.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.1	General applicability of the General Provisions	Yes.	
§63.2	Definitions	Yes	Additional terms defined in §63.6675.
§63.3	Units and abbreviations	Yes.	
§63.4	Prohibited activities and circumvention	Yes.	
§63.5	Construction and reconstruction	Yes.	
§63.6(a)	Applicability	Yes.	
§63.6(b)(1)–(4)	Compliance dates for new and reconstructed sources	Yes.	
§63.6(b)(5)	Notification	Yes.	
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§63.6(c)(1)–(2)	Compliance dates for existing sources	Yes.	
§63.6(c)(3)–(4)	[Reserved]		
§63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§63.6(d)	[Reserved]		
§63.6(e)	Operation and maintenance	No.	
§63.6(f)(1)	Applicability of standards	No.	
§63.6(f)(2)	Methods for determining compliance	Yes.	
§63.6(f)(3)	Finding of compliance	Yes.	
§63.6(g)(1)–(3)	Use of alternate standard	Yes.	
§63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§63.6(i)	Compliance extension procedures and criteria	Yes.	
§63.6(j)	Presidential compliance exemption	Yes.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.7(a)(1)–(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§63.6610, 63.6611, and 63.6612.
§63.7(a)(3)	CAA Section 114 authority	Yes.	
§63.7(b)(1)	Notification of performance test	Yes	Except that §63.7(b)(1) only applies as specified in §63.6645.
§63.7(b)(2)	Notification of rescheduling	Yes	Except that §63.7(b)(2) only applies as specified in §63.6645.
§63.7(c)	Quality assurance/test plan	Yes	Except that §63.7(c) only applies as specified in §63.6645.
§63.7(d)	Testing facilities	Yes.	
§63.7(e)(1)	Conditions for conducting performance tests	No.	Subpart ZZZZ specifies conditions for conducting performance tests at §63.6620.
§63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at §63.6620.
§63.7(e)(3)	Test run duration	Yes.	
§63.7(e)(4)	Administrator may require other testing under Section 114 of the CAA	Yes.	
§63.7(f)	Alternative test method provisions	Yes.	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes.	
§63.7(h)	Waiver of tests	Yes.	
§63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at §63.6625.
§63.8(a)(2)	Performance specifications	Yes.	
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring for control devices	No.	
§63.8(b)(1)	Monitoring	Yes.	
§63.8(b)(2)–(3)	Multiple effluents and multiple monitoring systems	Yes.	
§63.8(c)(1)	Monitoring system operation and maintenance	Yes.	
§63.8(c)(1)(i)	Routine and predictable SSM	Yes.	
§63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	Yes.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.8(c)(2)–(3)	Monitoring system installation	Yes.	
§63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that Subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§63.8(c)(6)–(8)	CMS requirements	Yes	Except that Subpart ZZZZ does not require COMS.
§63.8(d)	CMS quality control	Yes.	
§63.8(e)	CMS performance evaluation	Yes	Except for §63.8(e)(5)(ii), which applies to COMS.
		Except that §63.8(e) only applies as specified in §63.6645.	
§63.8(f)(1)–(5)	Alternative monitoring method	Yes	Except that §63.8(f)(4) only applies as specified in §63.6645.
§63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that §63.8(f)(6) only applies as specified in §63.6645.
§63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§63.6635 and 63.6640.
§63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§63.9(b)(1)–(5)	Initial notifications	Yes	Except that §63.9(b)(3) is reserved.
		Except that §63.9(b) only applies as specified in §63.6645.	
§63.9(c)	Request for compliance extension	Yes	Except that §63.9(c) only applies as specified in §63.6645.
§63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that §63.9(d) only applies as specified in §63.6645.
§63.9(e)	Notification of performance test	Yes	Except that §63.9(e) only applies as specified in §63.6645.
§63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.9(g)(1)	Notification of performance evaluation	Yes	Except that §63.9(g) only applies as specified in §63.6645.
§63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes	If alternative is in use.
		Except that §63.9(g) only applies as specified in §63.6645.	
§63.9(h)(1)–(6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. §63.9(h)(4) is reserved.
			Except that §63.9(h) only applies as specified in §63.6645.
§63.9(i)	Adjustment of submittal deadlines	Yes.	
§63.9(j)	Change in previous information	Yes.	
§63.10(a)	Administrative provisions for recordkeeping/reporting	Yes.	
§63.10(b)(1)	Record retention	Yes.	
§63.10(b)(2)(i)–(v)	Records related to SSM	No.	
§63.10(b)(2)(vi)–(xi)	Records	Yes.	
§63.10(b)(2)(xii)	Record when under waiver	Yes.	
§63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
§63.10(b)(2)(xiv)	Records of supporting documentation	Yes.	
§63.10(b)(3)	Records of applicability determination	Yes.	
§63.10(c)	Additional records for sources using CEMS	Yes	Except that §63.10(c)(2)–(4) and (9) are reserved.
§63.10(d)(1)	General reporting requirements	Yes.	
§63.10(d)(2)	Report of performance test results	Yes.	
§63.10(d)(3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.10(d)(4)	Progress reports	Yes.	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.10(e)(1) and (2)(i)	Additional CMS Reports	Yes.	
§63.10(e)(2)(ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.
§63.10(e)(3)	Excess emission and parameter exceedances reports	Yes.	Except that §63.10(e)(3)(i) (C) is reserved.
§63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
§63.10(f)	Waiver for recordkeeping/reporting	Yes.	
§63.11	Flares	No.	
§63.12	State authority and delegations	Yes.	
§63.13	Addresses	Yes.	
§63.14	Incorporation by reference	Yes.	
§63.15	Availability of information	Yes.	

Attachment H

Calculations for 10 CSR 10-6.400. E is the maximum allowable emissions based on process weight. $E = 4.10P^{0.67}$ for $P < 30$ tons per hour.

Building V-3				
Emission Point	MHDR (ton/hr)	Emission Factor (lb/ton)	PTE (lb/hr)	E (lb/hr)
EP 3-1	3	0.45	1.35	8.56
EP 3-2	2	0.9	1.80	6.52
EP 3-3	3	0.075	0.225	8.56
EP 3-4	30	0.18	5.40	40.04
EP 3-7	3	0.075	0.225	8.56
EP 3-8	1	0.87	0.87	4.10
EP 3-10	3	0.075	0.225	8.56
EP 3-11	3	0.075	0.225	8.56
EP 3-12	3	0.075	0.225	8.56
EP 3-13	3	0.075	0.225	8.56
EP 3-14	3	0.075	0.225	8.56

Building V-9				
Emission Point	MHDR (ton/hr)	EF (lb/ton)	PTE (lb/hr)	E (lb/hr)
EP 9-1	0.75	0.03	0.0225	0.72
EP 9-2	0.75	0.45	0.34	0.72

Building V-13				
Emission Point	MHDR (ton/hr)	EF (lb/ton)	PTE (lb/hr)	E (lb/hr)
EP 13-1	0.3	3	0.9	1.83
EP 13-2	0.1	3	0.3	0.88

Building V-16				
Emission Point	MHDR (ton/hr)	EF (lb/ton)	PTE (lb/hr)	E (lb/hr)
EP16-1				
Bulk Sack drop to Surge Bin	0.275	0.2	0.055	1.73
Surge Bin to Feed Auger	0.275	0.2	0.055	1.73
Feed Auger to Surge Bin	0.275	0.2	0.055	1.73
Surge Bin to LIW Feeder	0.275	0.2	0.055	1.73
LIW Feeder to Extruder	0.275	0.2	0.055	1.73
Auger to Particle Shaper	0.3	0.2	0.06	1.83
Particle Shaper Operations	0.3	2	0.6	1.83
Screen/Dryer to Surge Bin	0.3	0.034	0.0102	1.83
Surge Bin to Super Sack Filling	0.3	0.034	0.0102	1.83
Super Sack Filling to Encapsulation	0.3	0.034	0.0102	1.83
EP 16-2				
Bag Dump Station to Feeder	0.025	0.2	0.005	0.35
LIW Feeder to Extruder	0.025	0.2	0.005	0.35
EP 16-7				
Screen/Dryer Operation	0.3	1.6	0.48	1.83

*Emission factors were used in the development of Construction Permit 012008-012 and Construction Permit 122010-009

Attachment P
10 CSR 10-3.060 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-3.060 *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*. Installation's Total Heat Input (Q) in MMBtu/hr for existing equipment:

Emission Unit	Description	MHDR (MMBtu/hr)
EP 5-1	Boiler	27
EP 5-2	Boiler	29
Total Q		56

The maximum allowable PM emission limitation for existing indirect heating sources having an intermediate total heat input between ten MMBtu/hr and 1,000 MMBtu/hr is determined by the following equation: [10 CSR 10-3.060(4)(B)]

$$E = 0.90(Q)^{-0.174} = 0.90(56)^{-0.174} = 0.45$$

Emission Unit	Description	Emission Factor (lb/1000 gal)	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)
EP 5-1	Boiler	2.0	0.014	0.43
EP 5-2	Boiler	2.0	0.014	0.43

The boilers will also be in compliance while burning No. 2 fuel oil:

Emission Unit	Description	Emission Factor (lb/1000 gal)	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)
EP 5-1	Boiler	2.30	0.016	0.43
EP 5-2	Boiler	2.30	0.016	0.43

The emission factors were taken from FIRE for Process SCC 10300603 for natural gas and 10300502 for distillate oil. The average heating values of 1,050 Btu/scf for natural gas and 140 MMBtu/1000 gal for distillate oil used to convert the emission factors to lb/MMBtu were taken from AP-42 Appendix A. The calculations demonstrate that the emission units have worst-case emissions far below the applicable emission limit while being properly maintained and operated; therefore, no monitoring or recordkeeping other than maintenance records are required while combusting natural gas or distillate oil. The emission unit is in compliance with the emission limit without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

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 November 8, 2011;
2. 2010 Emissions Inventory Questionnaire, received April 26, 2011; and
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
4. U.S. EPA's Factor Information Retrieval (FIRE) Date System 6.25

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.

40 CFR Part 63 Subpart ZZZZ *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is applicable to EP 5-14 and EP 5-15. The application did not list this as an applicable requirement but an email from Jon Barrows of BCP Ingredients dated February 3, 2012, indicated that EP 5-14 and EP 5-15 are subject to this rule.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*

This rule does not apply to any of the equipment in Building V-5 because the boilers and generator use natural gas or fuel oil which are excluded from process weight. [10 CSR 10-6.400(2)(A)] The rule does not apply to the tanks or parts washer because they do not emit particulate matter.

This rule does not apply to any of the equipment in Buildings V-8, V-10, V-11, V-14, V-20, or V-25 because none of the units in those buildings emit particulate matter.

This rule does not apply to the equipment in Buildings V-3, V-9, V-13, or V-16 because they either have a potential to emit of less than 0.5 pounds of particulate matter per hour or have a potential to emit that is less than the amount allowed by process weight. [10 CSR 10-6.400(1)(B)12 and 10 CSR 10-6400(1)(B)16]

A summary of particulate matter emissions for these units can be found in Appendix H.

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating*

This rule does not apply because the indirect heating equipment at the installation uses natural gas and No. 2 fuel oil exclusively. [10 CSR 10-6.405(1)(E)]

Construction Permit Revisions

1. Construction Permit 0290-012, Issued February 26, 1990
Construction Permit 0290-012A, Issued October 13, 1994
These permits refer to products made in V-19 that were shutdown in January 2002. The equipment was sold in September 2005. Therefore, no reference to this permit or process is included in the operating permit.
2. Construction Permit 0990-001, Issued August 17, 1990
This permit was issued for the production and storage of tetramethyl ammonium chloride. This permit contains special conditions which are not included because they were superseded by Construction Permit 012008-012.
3. Construction Permit 0991-012, Issued September 27, 1991
This construction permit referred to the densification process in building V-2. The process was shutdown in March of 2001. Equipment was sold in 2003. Therefore, no reference to this permit or process is included in the operating permit
4. Construction Permit 1191-005, Issued November 12, 1991
This construction permit was issued for a bulk storage tank for acetic acid liquors.
5. Construction Permit 0692-025, Issued June 15, 1992
Construction Permit 0692-025A, Issued October 6, 2006
This construction permit was issued for the modification of the tetramethyl ammonium chloride process. The conditions in this permit were superseded by Construction Permit 012008-012.
6. Construction Permit 0793-005, Issued July 9, 1993
This construction permit was issued for various equipment that was installed without permits
7. Construction Permit 0294-001, Issued July 26, 1993
This permit was issued to construct and modify three processes
8. Construction Permit 0893-013, Issued July 22, 1993
This construction permit refers to equipment in the V-2 and V-19 buildings that conducted densification and sodium propionate/potassium benzoate production. The V-2 process was shut down in March 2001 and V-19 processes were shutdown in January 2002. Therefore, no reference to this permit or process is included in the operating permit.
9. Construction Permit 0694-025, Issued June 29, 1994
This permit was issued install equipment to increase production of choline salts by the addition of a boiler
10. Construction Permit 0694-007, Issued May 31, 1994
This construction permit was issued to increase production of choline salts by adding a dryer. This permit contains limited emissions to 39.9 tons per year of VOC. BCP Ingredients has voluntarily requested that this limit be superseded by Construction Permit 012008-012.
11. Construction Permit 0894-029, Issued July 31, 1994
This construction permit was issued for the installation of a crystallizer, receiver, and heat exchanger. This permit contains special conditions which do not appear in this operating permit because the construction permit was superseded by Construction Permit 012008-012.
12. Construction Permit 0297-019, Issued February 20, 1997
This permit was issued to increase the production of sodium and potassium benzoate. These products were made in V-19 that was shutdown in January 2002. The equipment was sold in September 2005. Therefore, no reference to this permit or process is included in the operating permit.
13. No Construction Permit Required Determination Project Number 1090-004-022, Issued April 23, 1996

This no permit required determination was issued for the replacement of a 4500 gallon tank with a 6000 gallon tank.

14. Construction Permit 0997-045, Issued September 30, 1997
This permit was issued to increase the throughput limit of dry acetate on three permitted tanks. It refers to equipment in the V-2 and V-19 buildings that conducted densification and sodium propionate/potassium benzoate production. The V-2 process was shut down in March 2001 and V-19 processes were shutdown in January 2002. Therefore, no reference to this permit or process is included in the operating permit.
15. No Construction Permit Required Determination Project Number 2580-0004-025, Issued July 14, 1997
16. No Construction Permit Required Determination Project Number 1090-004-024, Issued July 14, 1997
17. Construction Permit 0498-006, Issued April 9, 1998
This permit was issued to increase the production of sodium and potassium benzoate. This permit refers to products made in V-19 that were shutdown in January 2002. The equipment was sold in September 2005. Therefore, no reference to this permit or process is included in the operating permit.
18. No Construction Permit Required Determination Project Number 1998-06-077, Issued October 21, 1998
19. Construction Permit 122000-006, Issued December 18, 2000
This was a temporary permit to conduct trial batch operations
20. Construction Permit 032002-023, Issued March 27, 2002
This permit was issued for the construction of liquid/gas repacking stations. The permit contains special conditions which appear in this operating permit as Permit Condition (EP 25-1)-001
21. Construction Permit 012002-009, Issued January 14, 2002
This permit was issued for the installation of processing equipment for the encapsulation of feed and food-grade materials. This permit contains special conditions which appear in this operating permit as Permit Condition (EP 9-1)-002
22. No Construction Permit Required Determination Project Number 2006-07-085, Issued September 26, 2006
This no construction permit required determination was issued to increase the production of trimethyl ammonium chloride from 10,000,000 pounds per year to 17,000,000 pounds per year.
23. Construction Permit 012008-012, Issued January 29, 2008
This permit was issued for equipment additions to existing production lines. This permit contains special conditions which appear in this operating permit. This permit also contains conditions that require the equipment in buildings V-2 and V-19 be rendered inoperable. The permit contains performance testing requirements for the EO scrubber. The performance test was accepted by Peter Yronwode, APCP Senior Emission Testing Coordinator, on January 8, 2009.

Special Conditions 2B(1) and 2B(3) are not included because they set a limit on individual HAPs which is less strict than the one in Permit Condition PW001.

Boilers #4 and #5 (EP 5-4 and EP 5-17) that were permitted in this project were never installed and therefore no permit conditions are included.

Special Condition 4A required that tanks of alcohol be tightly sealed at all times except during fill operations. A closed container is defined in 10 CSR 10-6.020 as “a container with a cover fastened in place so that it will not allow leakage or spilling of the contents.” The only time the tanks at the facility could leak would be because of an overflow during a fill operation.

24. No Construction Permit Required Determination Project Number 2008-02-085, Issued March 28, 2008

This no permit required determination was issued for the addition of a new product line in building V-9.

25. Construction Permit 122010-009, Issued December 13, 2010

Construction Permit 122010-009A, Issued November 28, 2011

This permit was issued for the installation of a new mixing and drying line. This permit contains special conditions which appear in this operating permit as Permit Condition (EP 16-1 through 16-8)-001

New Source Performance Standards (NSPS) Applicability

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

This rule does not apply to any of the boilers at the installation because no boiler larger than 10 MMBtu/hr was installed after 1989. [§60.40c(a)]

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*

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*

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*

The table below shows applicability of these rules:

Storage Vessel	Liquid Stored	Max True Vapor Pressure (kPa)	Capacity (1000 gal)	Construction/Modification Date	K Applicable?	Ka Applicable?	Kb Applicable?
EP 5-5	fuel oil	0.06	11.3	1974	No ¹	No ²	No ²
EP 5-8	gasoline	NA	0.45	1960	No ²	No ²	No ²
EP 5-12	fuel oil	0.06	0.11	1960	No ²	No ²	No ²
EP 8-4	aqueous choline	NA		1962	No ²	No ²	No ²
EP 11-1	Alcohol	5.8	6	1993	No ²	No ²	No ¹
EP 11-14	TMAC	NA	6	1993	No ²	No ²	No ¹
EP 11-16	MeCl	495	30	1957	No ²	No ²	No ²
EP 14-2	virgin alcohol	16.4	6.34	Not Available	No ¹	No ¹	No ¹
EP 14-3	recovered alcohol	16.4	25	1978	No ²	No ¹	No ²
EP 14-4	spent alcohol	16.4	22	1962	No ²	No ²	No ²

¹Storage capacity less than applicability threshold

²Installed outside of applicability dates

Applicable capacity threshold:

Subpart K: greater than 40,000 gallons

Subpart Ka: greater than 40,000 gallons

Subpart Kb: greater than 19,813 gallons

Note: The previous operating permit listed tanks associated with EP 10-4, EP 10-5, and EP 10-6. These tanks are not included in the table above because they are either only used as temporary storage for wastewater or have been permitted for another use.

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

This rule does not apply because the emergency generator engine and fire pump engine were installed prior to the applicability date of July 11, 2005. [§60.4200(a)(2)]

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart F *National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry*

This regulation does not apply because the facility does not manufacture any of the chemicals listed in Table 1 of Subpart F, nor tetrahydrobenzaldehyde, or crotonaldehyde as a primary product.

[§63.100(b)(1)]

40 CFR Part 63 Subpart FFFF *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing*

This rule does not apply to this installation because it only applies to processes that are part of a major source of HAP. The installation is limited by Permit Condition PW001 to less than the major source threshold. [§63.2435(a)]

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

The installation has an emergency generator engine and a firewater pump engine. Both engines are compression ignition stationary reciprocating internal combustion engines located at an area source of HAP. The engines were installed prior to 2006, and are therefore considered existing engines that are subject to this rule. [§63.6585]

The installation is not required to submit any notifications required in §63.6645(a) because the existing stationary RICE at BCP Ingredients are subject to management practice requirements, but are not subject to any numerical emission standards. [§63.6645(a)(5)]

40 CFR Part 63, Subpart CCCCCC *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

Gasoline tank, EP 5-8, is used for fueling and has a throughput of less than 10,000 gallons per year and is therefore must comply with the requirements in §63.11116.

40 CFR Part 63, Subpart JJJJJJ *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources*

This rule does not apply because the boilers at the installation are all gas fired which is defined as any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. [§63.11195(e) and §63.11237]

Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year. A period of natural gas curtailment or supply interruption means a period of time during which the supply of natural gas to an affected facility is halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas does not constitute a period of natural gas curtailment or supply interruption.

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 are above major source thresholds

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 tons per year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 34,208 tons, classifying the installation as a minor source of GHGs.

This source is not subject to 40 CFR Part 98 - *Mandatory Greenhouse Gas Reporting Rule* at this time. However, should the installation's actual emissions exceed the 25,000 metric ton threshold, it would be subject at that time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's actual CO₂ emissions were not included within this permit.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)
CO	27.81
CO ₂ e	34,208
HAP	25
NO _x	49.95
PM ₁₀	49.86
PM ₂₅	7.77
SO _x	122.85
VOC	87.63

Note: Due to the HAP limitation, potential to emit VOCs will be below the plant wide limit.

Other Regulatory Determinations

10 CSR 10-3.060 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating* was rescinded by the State of Missouri on October 30, 2011 and replaced by 10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*. 10 CSR 10-3.060 has not yet been removed from Missouri's State Implementation Plan (SIP) and is, therefore, still federally enforceable, but not state enforceable (see Permit Condition (EP 5-1 and EP 5-2)-003). 10 CSR 10-3.060 will no longer be federally enforceable upon removal from Missouri's SIP.

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:

Colin Janssen
Environmental Engineer

CERTIFIED MAIL: 70093410000193532115
RETURN RECEIPT REQUESTED

Mr. Jerome Freiburger
BCP Ingredients, Inc.
P.O. Box 85
Verona, MO 65769

Re: BCP Ingredients, Inc., 109-0004
Permit Number: **OP2012-024**

Dear Mr. Freiburger:

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 thirty 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 Colin Janssen 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:cjk

Enclosures

c: Southwest Regional Office
PAMS File: 2011-11-015