

Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

AUG 19 2019

Mr. Merle Barber  
BCP Ingredients, Inc.  
P.O. Box 85  
Verona, MO 65769

Re: Renewal of Part 70 Operating Permit  
Installation ID: 109-0004, Permit Number: OP2019-025

Dear Mr. Barber:

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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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 contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bj

Enclosures

c: PAMS File: 2017-02-062



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# 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:** OP2019-025  
**Expiration Date:** AUG 19 2024  
**Installation ID:** 109-0004  
**Project Number:** 2017-02-062

**Installation Name and Address**

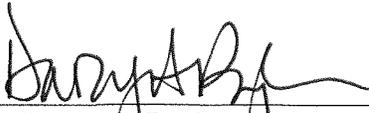
BCP Ingredients, Inc.  
299 Extension Street  
Verona, MO 65769  
Lawrence County

**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 hazardous air pollutants: ethylene oxide, ethylene glycol, and hydrogen chloride. The installation is subject to 40 CFR Part 63 Subpart ZZZZ and 40 CFR Part 63 Subpart CCCCCC.



Director or Designee  
Department of Natural  
Resources

AUG 19 2019

Effective Date

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## I. Installation Equipment Listing

### 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 Point #	Description
EP 03-01	Dust Cyclone Stack (Cob & Rice Hull Weighing) (MHDR 3 tph)
EP 03-02	Custom Cyclone Stack #1 (Dry Choline Drying) (9.9 MMBTU/hr natural gas) (MHDR 3 tph)
EP 03-03	Custom Cyclone Stack #2 (Product Packaging) (MHDR 3 tph)
EP 03-08	Cyclone (MHDR 3 tph)
EP 03-10	Rework Hopper (MHDR 3 tph)
EP 03-11	Cooler (MHDR 3 tph)
EP 03-12	Hopper (MHDR 3 tph)
EP 03-13	Packaging (MHDR 3 tph)
EP 05-01	Boiler Stack #1 (27 MMBTU/hr Industrial Boiler)
EP 05-02	Boiler Stack #2 (29 MMBTU/hr Industrial Boiler)
EP 05-08	Gasoline Storage Tank (750 gal)
EP 05-14	Generator (305 hp diesel)
EP 05-15	Firewater Pump (380 hp diesel)
EP 09-1	Flex Kleen Baghouse Stack (Premix Processing) (MHDR 2 tph)
EP 10-1	EO Scrubber Stack (MHDR 0.1 tph)
EP 10-2	Heil 734 Mf Stack (MHDR 0.1 tph)
EP 10-3	V-10 Vent Header (MHDR 0.1 tph)
EP 13-1	V-13 Vacuum Vent (Choline Salts Vacuum Drying) (MHDR 0.45 tph)
EP 13-2	Material Processing And Handling For Choline Salts In V13 (MHDR 0.3 tph)
EP 16-1	Bulk Sack Drop (MHDR 0.275 tph)
EP 16-2	Bag Dump Station (MHDR 0.025 tph)
EP 16-7	Fluidized Dryer/Cooler (MHDR 0.3 tph)
EP 16-8	Particle Shaper Operations (MHDR 0.3 tph)
EP 25-1	Repackaging Fugitives (Loading/Transfer) (MHDR 1.0 tph)
EP 26-04	V-26 Dry Choline Cyclone Stack (Drying) (6.0 MMBTU/hr natural gas) (MHDR 4.5 tph)

**EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS**

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

Emission Point #	Description
EP 03-04	Cob Meal Silo #1 Stack (Unloading & Conveying)
EP 03-07	Fugitives (Bulk Product Load out)
EP 03-14	Bulk Load out
EP 05-05	#2 Fuel Oil Storage Tank (Near V-5) (17,000 gal)
EP 05-09	Propane Storage Tank
EP 05-10	Building Fugitives (Parts Cleaner Solution)
EP 05-11	Vehicle Refueling
EP 05-12	Fuel Oil Storage Tanks
EP 05-13	Vehicle Refueling
EP 08-1	4602 Process Liquor Storage Tank Vent
EP 08-2	Hcl Scrubber Stack (3 Hcl Storage Tanks)
EP 08-3	Heil Scrubber Stack (Mixing And Reacting)
EP 08-4	Aqueous Choline Storage Tanks (5 Tanks)
EP 08-5	Fugitives (Eo Tank/Loading/Transfer)
EP 08-6	Hold Tank
EP 08-7	Receiver
EP 09-2	V-9 Building (Premix Processing Fugitives)
EP 10-7	Fugitives (V-10 Piping)
EP 11-01	Ethyl Alcohol Storage Tank
EP 11-02	Recovered Alcohol Storage Tank
EP 11-06	Ss-2005 Tank Vent (Taos Production)
EP 11-12	V-11 Fugitives (Taos Loading Platform)
EP 11-13	Tmac Storage Tank
EP 11-14	Acetic Acid Storage Tank
EP 13-3	V-13 Building Fugitives (Choline Salts Packaging)
EP 14-1	Ethanol Recovery Still Vent
EP 14-2	New Ethanol Storage Tank Vent
EP 14-3	Dry Ethanol Storage Tank Vent
EP 14-4	Wet Ethanol Storage Tank Vent
EP 14-5	#1 Ethanol Receiver Tank Vent
EP 14-6	#2 Ethanol Receiver Tank Vent
EP 14-7	#4 Ethanol Receiver Tank Vent
EP 14-8	Ethanol Still Bottoms Storage Tank Vent
EP 14-9	Fugitives (Methanol Storage/Dist Piping)
EP 20-1	Settling Tank #1 (Wastewater Treatment)

Emission Point #	Description
EP 20-2	Settling Tank #2 (Wastewater Treatment)
EP 20-3	Aerated Lagoon (Wastewater Treatment)
EP 26-01	V-26 Encap Baghouse
EP 26-02	V-26 Encap Fugitive
EP 26-03	V-26 Dry Choline Cyclone Stack (Mixing)
EP 26-05	V-26 Dry Choline Bulk Bag Cyclone (Packaging)
EP 26-06	V-26 Dry Choline Carrier Stack (Unload & Conveying)
EP 26-07	V-26 Dry Choline Rework Hopper
EP 26-08	V-26 Dry Choline Cooler
EP 26-09	V-26 Dry Choline Bagging Hopper
EP 26-10	V-26 Dry Choline Bag Packaging

## 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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

### PERMIT CONDITION PW 1

10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(5)(C)1. Voluntary Limitation(s)

#### Emission Limitation

The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of combined HAPs in any rolling 12-month period from the entire installation.

#### Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of HAP emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment E).
- 2) The permittee shall keep all records for a minimum of 5 years and be made available to department personnel upon request.

#### Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

### PERMIT CONDITION PW 2

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 032015-001, Issued March 3, 2015  
10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(5)(C)1. Voluntary Limitation(s)

#### Emission Limitations

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

#### Operational Limitations

The permittee shall ensure that all tanks or containers of alcohol are tightly closed at all times except during fill operations. (Special Condition 4A)

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an accurate record of VOC emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment E).
- 2) The permittee shall keep all records for a minimum of 5 years and be made available to department personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 1</b> 10 CSR 10-6.060, Construction Permits Required Construction Permit 012002-009, Issued December 14, 2001	
<b>Emission Unit</b>	<b>Description</b>
EP 9-1	Flex Kleen Baghouse Stack (Premix Processing) (MHDR 2 tph) Weighing, charging, blending, encapsulating, and packing activities attached to a fabric filter. Installed 2002.

#### **Emission Limitation**

The permittee shall not emit VOCs from the Flex Kleen encapsulation process (EP 9-1) in excess of 40 tons in any rolling 12-month period. (Special Condition 1)

#### **Operational Limitations**

- 1) The permittee shall control particulate emissions from EP 9-1 using dust collectors. The dust collectors shall be operated and maintained in accordance with the manufacturer's specifications.
- 2) The permittee shall ensure that the dust collectors are 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) The permittee shall record amount of vegetable oil used monthly (see Attachment E for instructions on calculating VOC emissions).
- 2) The permittee shall monitor and record the operating pressure drop across the dust collectors at least once every 24 hours while the associated equipment is in operation (see Attachment F or equivalent). 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) The permittee shall keep all records for a minimum of 5 years and be made available to department personnel upon request.

**Reporting**

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 2</b>	
10 CSR 10-6.060, Construction Permits Required	
Construction Permit 032002-023, Issued March 27, 2002	
<b>Emission Unit</b>	<b>Description</b>
EP 25-1	Repackaging Fugitives (Loading/Transfer)

**Monitoring**

- 1) The permittee shall establish a written LDAR program using EPA Method 21 to control and mitigate fugitive leaks from the ethylene oxide (EO) system. The EO system consists of a completely closed network of equipment and piping that safely transfers EO from bulk storage to UN 1A1 drums that comply with 49 CFR 178.504. All potential emissions points within the system shall be monitored on at least an annual frequency with valves and pumps within the system checked at least quarterly. Should results indicate a leak, the permittee shall take necessary actions to remedy the causes of any such leaks and restore the operation of the system to its original performance level. [modified Special Condition 1]
- 2) The permittee shall clearly mark detected leaks with a weatherproof and readily visible identification, which includes the equipment identification number. Identification shall remain in place until the leak is repaired. [Special Condition 2]

**Recordkeeping**

The permittee shall record each inspection and keep these records at the site for at least five years. Attachment D or another similar log created by the facility shall be used to comply with this condition.

**Reporting**

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

<b>PERMIT CONDITION 3</b>	
10 CSR 10-6.060, Construction Permits Required Construction Permit 012008-012, Issued January 29, 2008	
Emission Unit	Description
EP 3-1	Mixer with cent collector
EP 3-2	Direct fired natural gas product dryer. Connected to a centrifugal collector with medium efficiency. Installed 1965
EP 3-3	Sack weight hopper with cyclone
EP 3-8	Weigh bin
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 10-1	Ethylene Oxide Scrubber - wet scrubber for various ethylene oxide handling equipment throughout the plant site
EP 10-2	Heil Scrubber Stack
EP 10-3	Building V-10 Vent Header
EP 13-2	Materials Processing and Handling for Choline Salts in V-13

**Emission Limitation**

- 1) The permittee shall emit less than 17.9 tons of PM<sub>10</sub> in any rolling 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 in any rolling 12-month period from the following emission points: EP 3-2 and EP 10-2 through -3. (Special Condition 2B)

**Operational Limitation**

- 1) The permittee shall ensure that the ethylene oxide Scrubber (EP10-1) is in use at all times when the associated equipment is in operation. (Special Condition 4D)
- 2) The permittee shall ensure that the vacuum system and seals associated with the equipment in building V-10 are maintained and kept in good working order. (Special Condition 4B)
- 3) The permittee shall ensure that the cyclone controlling emissions from EP3-2 is in use at all times. The cyclone shall be operated and maintained in accordance with the manufacturer's specifications. (Special Condition 4C)

**Monitoring/Recordkeeping:**

- 1) The permittee shall inspect the ethylene oxide scrubber (EP 10-1) at least once every six 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.
- 3) The permittee shall maintain an accurate record of VOC and HAP emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment E).
- 4) The permittee shall keep all records for a minimum of 5 years and be made available to department personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 4</b>	
10 CSR 10-6.060, Construction Permits Required	
Construction Permit 122010-009A, Issued November 28, 2011	
Emission Unit	Description
EP 16-1	Bulk Sack Drop
EP 16-2	Bag Dump Station
EP 16-7	Fluidized Dryer/Cooler
EP 16-8	Particle Shaper Operations

**Operational Limitation**

- 1) The permittee shall control emissions from this equipment using cartridge filters or baghouses. (Special Condition 2A)
- 2) The permittee shall operate and maintain all cartridge filters and baghouses 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 Recordkeeping 1) below.
  - 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 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) The permittee shall keep replacement filters 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 keep all records for a minimum of 5 years and be made available to department personnel upon request. These records shall include Material Safety Data Sheets for all materials used. (Special Condition 3A)

**Reporting**

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

<b>PERMIT CONDITION 5</b>		
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ NESHAP for Stationary Reciprocating IC Engines		
<b>Emission Point</b>	<b>Emission Unit</b>	<b>Description</b>
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

**Maintenance Standards:**

The permittee shall meet the following maintenance requirements for these units [Table 2c]:

- a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - i) The permittee may use an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement.

- b) Inspect air cleaner every 1,000 hours of operations or annually, whichever comes first; and
- c) Inspect all hoses and belts every 500 hours of operations or annually, whichever comes first, and replace as necessary.

**Operational Standards:**

- 1) The permittee shall operate and maintain the emergency RICE and after- treatment control device (if any) according to the manufacturer's emission-related written instructions or develop its 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)]
- 2) The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
- 3) The permittee shall operate the emergency stationary RICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. [§63.6640(f)]
  - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
  - b) The permittee may operate the emergency stationary RICE for the purpose specified in i) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c) below count as part of the 100 hours per calendar year allowed. [§63.6640(f)(2)]
    - i.) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
  - c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph §63.6640(f)(2). Except as provided in i) below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
    - i.) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)(A) though (E)]
      - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
      - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
      - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

- (4) The power is provided only to the facility itself or to support the local transmission and distribution system.
  - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.
- 4) If the permittee does not operate the engine according to the requirements in 1)a) through c) above, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an operating and maintenance log using Attachment D or an equivalent.
- 2) The permittee shall keep all records for a minimum of 5 years and be made available to department personnel upon request.

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition to the Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with a copy to Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.

<b>PERMIT CONDITION 6</b>		
10 CSR 10-6.075, Maximum Achievable Control Technology		
40 CFR Part 63, Subpart CCCCC NESHAP for Source Category: Gasoline Dispensing Facilities		
<b>Emission Point</b>	<b>Emission Unit</b>	<b>Description</b>
EP 5-8	750 gal Gasoline tank used for fueling with a maximum usage of 2,000 gallons per year	Unknown

**Management Practices**

- 1) The permittee shall, at all times, operate and maintain EP 5-8 in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.11115(a)]
- 2) The permittee shall 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)]
- 3) The permittee shall 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)]
  - a) Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F, are considered acceptable for compliance this condition. [§63.11116(d)]

**Recordkeeping/Reporting**

- 1) The permittee shall keep monthly records of gasoline usage. Purchase receipts are sufficient. These records shall be made available to Department of Natural Resources personnel upon request.
- 2) No reporting is required. [§63.11116(b)]

<b>PERMIT CONDITION 7</b>	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP 03-02	Custom Cyclone Stack #1 (Dry Choline Drying)
EP 03-04	Cob Meal Silo #1 Stack (Unloading & Conveying)
EP 05-14	Generator
EP 05-15	Firewater Pump
EP 09-1	Flex Kleen Baghouse Stack (Premix Processing)
EP 13-1	V-13 Vacuum Vent (Choline Salts Vacuum Drying)
EP 13-2	Material Processing And Handling For Choline Salts In V13
EP 26-04	V-26 Dry Choline Cyclone Stack (Drying)

**Emission Limitation:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
- 2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
- 3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

**Monitoring:**

- 1) Monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
    - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
      - ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
- 2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
- 3) Observations are only required when the emission units are operating and when the weather conditions allow.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
- 5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted

for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.

- 6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

**Record Keeping:**

- 1) The permittee shall maintain records of all observation results for each emission unit using Attachments B and C or equivalent forms.
- 2) The permittee shall make these records available within a reasonable period of time for inspection to the Department of Natural Resources' personnel upon request.
- 3) The permittee shall retain all records for five years.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

## 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 are only excerpts from the regulation or code, and are 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) 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.

### 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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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

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.

#### **10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit a 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) 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.
- 3) 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.

#### **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 10-6.165 Restriction of Emission of Odors**

#### **This is a State Only permit requirement.**

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 10-6.170**

#### **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 equipment malfunctions contributed to an exceedance.
- 3) 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 10-6.250 Asbestos Abatement Projects**

**Certification, Accreditation, and Business Exemption Requirements**

**This is a State Only permit requirement.**

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.

**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 at an installation:

- 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.

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

- 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 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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.*

## 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,

### Permit Duration

#### 10 CSR 10-6.065(5)(C) 1.B, 10 CSR 10-6.065(5)(E)3.C

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### General Record Keeping and Reporting Requirements

#### 10 CSR 10-6.065(5)(C)1.C

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).
  - 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.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. 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 (5)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during

the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

### **Risk Management Plan Under Section 112(r)**

#### **10 CSR 10-6.065(5)(C)1.D**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

### **Severability Clause**

#### **10 CSR 10-6.065(5)(C)1.F**

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.

### **General Requirements**

#### **10 CSR 10-6.065(5)(C)1.G**

- 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(5)(C)1.

### **Incentive Programs Not Requiring Permit Revisions**

#### **10 CSR 10-6.065(5)(C)1.H**

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.

### **Reasonably Anticipated Operating Scenarios**

#### **10 CSR 10-6.065(5)(C)1.I**

There are no reasonably anticipated operating scenarios.

### **Compliance Requirements**

#### **10 CSR 10-6.065(5)(C)3**

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

### **Permit Shield**

#### **10 CSR 10-6.065(5)(C)6**

- 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.

### **Emergency Provisions**

#### **10 CSR 10-6.065(5)(C)7**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

### **Operational Flexibility**

#### **10 CSR 10-6.065(5)(C)8**

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

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

### **Off-Permit Changes**

#### **10 CSR 10-6.065(5)(C)9**

- 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 permit, 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(B)3 of this rule. 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.

### **Responsible Official**

#### **10 CSR 10-6.020(2)(R)34**

The application utilized in the preparation of this permit was signed by Merle Barber, 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.

### **Reopening-Permit for Cause**

#### **10 CSR 10-6.065(5)(E)6**

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) 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) MoDNR 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) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**Statement of Basis**

**10 CSR 10-6.065(5)(E)1.C**

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 B**

Method 22 Visible Emissions Observations					
Installation Name	Observer Name				
Location	Date				
Sky Conditions	Wind Direction				
Precipitation	Wind Speed				
Time	Emission unit				
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.					
Minute	Seconds				Comments
	0	15	30	45	
Visible Emissions Yes (Y) or No (N)					
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

**Attachment C**

Method 9 Opacity Observations		
Installation Name:	Sketch of the observer's position relative to the emission unit	
Emission Point:		
Emission Unit:		
Observer Name and Affiliation:		
Observer Certification Date:		
Method 9 Observation Date:		
Height of Emission Point:		
Time:	Start of observations	End of observations
Distance of Observer from Emission Point:		
Observer Direction from Emission Point:		
Approximate Wind Direction:		
Estimated Wind Speed:		
Ambient Temperature:		
Description of Sky Conditions (Presence and color of clouds):		
Plume Color:		
Approximate Distance Plume is Visible from Emission Point:		

**Attachment C (continued) Method 9 Opacity Observations**

Minute	Seconds				1- minute Avg. % Opacity <sup>1</sup>	6- minute Avg. % Opacity <sup>2</sup>	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity) <sup>3</sup>								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									

The emission unit is in compliance if each six-minute average opacity is less than or equal to 40 %.  
 Exception: The emission unit is in compliance if one six-minute average opacity is greater than 40 %, but less than 60 %.

Was the emission unit in compliance at the time of evaluation (yes or no)?

Signature of Observer

<sup>1</sup> 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.  
<sup>2</sup> 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.  
<sup>3</sup> Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.



**Attachment E**  
Custom Tracking Worksheets

**Plantwide PW 1 emission limit:**

- Permit Condition PW 1 of this operating permit limits the emissions of HAPs emitted by this installation to less than 10 tons of any single HAP and less than 25 tons of combined HAPs in any rolling 12-month period from the entire installation. When calculating the total emissions, be sure to include emissions from all emissions sources at this installation, listed on pages 3 and 4 of this operating permit as EP-03-01 through EP-26-10. Emissions may be grouped by type; for example, all natural gas combustion sources may be grouped and tracked together by fuel usage.
- Record at a minimum the following information:
  - The monthly throughput for each product.
  - For each HAP and process, identify and use emission factors in the following order of precedence: LDAR (or other process-specific study), APCP construction permits; mass balance or other process-specific engineering calculation, AP-42/WebFIRE, or California Emission Inventory Development and Reporting System (CEIDARS).
  - The natural gas consumption in MMSCF for the entire facility; use the emission factor from WebFIRE of 1.89 lbs. HAPs/MMSCF.
  - The diesel fuel consumption in 1,000 gal for the entire facility; use the emission factor from WebFIRE of 1.89 lbs. HAPs/1000 gal.
- Calculate monthly individual (currently hydrogen chloride, methylene chloride, ethylene glycol, and/or ethylene oxide), and combined HAP emissions by multiplying throughput and emission factor for each type.
- Calculate rolling 12-month individual (currently hydrogen chloride, methylene chloride, ethylene glycol, and/or ethylene oxide), and combined HAP emissions by adding current month's emissions to previous eleven months emissions.
- Compare emission total to limit and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with 10 CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

**Plantwide PW 2 emission limit:**

- Permit Condition PW 2 of this operating permit limits the emissions of VOCs emitted by this installation to less than 250 tons in any rolling 12-month period from the entire installation. When calculating the total emissions, be sure to include emissions from all emissions sources at this installation, listed on pages 3 and 4 of this operating permit as EP-03-01 through EP-26-10. Emissions may be grouped by type; for example, all natural gas combustion sources may be grouped and tracked together by fuel usage.
- Record at a minimum the following information:
  - The monthly throughput for each product.
  - For each VOC and process, identify and use emission factors in the following order of precedence: LDAR (or other process-specific study), APCP construction permits; mass balance or other process-specific engineering calculation, AP-42/WebFIRE, or CEIDARS.

- o The fuel consumption in MMSCF for the entire facility; use the emission factor from WebFIRE of 5.5 lbs VOCs/MMSCF
- o The diesel fuel consumption in 1,000 gal for the entire facility; use the emission factor from WebFIRE of 49.3 lbs VOCs/1000 gal.
- Calculate monthly VOC emissions by multiplying throughput and emission factor for each type.
- Add 3.20 tons for VOC emissions from all tank losses, fugitives, and vehicle fueling.
- Calculate rolling 12-month VOC emissions by adding current month's emissions to previous eleven months emissions
- Compare emission total to limit and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with 10 CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

**Permit Condition 1 emission limits:**

- Per Special Condition 1 of construction permit 012002-009, incorporated in this operating permit as Permit Condition 1, track and record the emissions of VOCs from emission point EP9-1 to ensure that the emissions of VOCs will not exceed 40 tons in any rolling twelve month period.
- Record at a minimum the following information:
  - o The monthly throughput of vegetable oil used in the encapsulation process EP9-1.
  - o Identify and use VOC emission factors from the most recent stack test.
- Calculate monthly VOC emissions by multiplying the amount of vegetable oil used each month (the throughput) by the emission factor.
- Calculate rolling 12-month emissions of VOC by adding current month's emissions to previous eleven months emissions.
- Compare emission total to limit and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with 10 CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

**Permit Condition 3 emission limits:**

- Per Special Condition 2 of construction permit 012008-012, incorporated in this operating permit as Permit Condition 3, track and record the emissions of PM<sub>10</sub> and ethylene oxide from emission points E3-1 through 13-2 to ensure that the emissions of PM<sub>10</sub> will not exceed 17.9 tons and of ethylene oxide of 0.32 tons in any rolling twelve month period. See **Plantwide PW 1 emission limit:** above for ethylene oxide tracking.
- Record at a minimum the following information:
  - o The monthly throughput for each product.
  - o For each process, use PM<sub>10</sub> emission factors in the following order of precedence: LDAR (or other process-specific study), APCP construction permits; mass balance or other process-specific engineering calculation, AP-42/WebFIRE, or CEIDARS.
- Calculate monthly PM<sub>10</sub> emissions by multiplying the amount of solvent release agent used each month (the throughput) by the emission factor found from the SDS(s).
- Calculate rolling 12-month emissions of PM<sub>10</sub> by adding current month's emissions to

previous eleven months emissions.

- Compare emission total to limit and indicate whether or not compliance was met
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with 10 CSR 10-6.050 Startup, Shutdown and Malfunction Conditions.



## STATEMENT OF BASIS

### 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 PM<sub>10</sub> and VOCs and a synthetic minor source of ethylene oxide, ethylene glycol, and combined HAPs. The installation is subject to 40 CFR Part 63 Subpart ZZZZ and 40 CFR Part 63 Subpart CCCCCC. It is a named source, chemical processing plants, and fugitives are counted towards potential-to-emit calculations.

### Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

Pollutants	Potential Emissions <sup>1</sup>	Reported Emissions				
		2017	2016	2015	2014	2013
PM <sub>10</sub>	126.60	16.69	14.06	12.68	9.24	9.46
PM <sub>2.5</sub>	54.16	9.84	9.79	10.30	6.39	6.70
SO <sub>x</sub>	0.33	0.04	0.05	0.04	0.04	0.04
NO <sub>x</sub>	32.27	5.83	6.75	5.67	5.17	5.08
VOCs	322.11	73.11	70.05	71.06	55.44	60.74
CO	25.69	4.83	5.60	4.69	4.28	4.21
HAPs	46.97	4.51	15.22	13.91	13.47	8.12
Ethylene glycol	9.76	0	4.39	3.08	2.64	2.55
Hydrogen chloride	3.93	3.00	2.89	2.89	2.89	2.20
Ethylene oxide	34.10	1.51	1.83	1.83	1.83	1.49
Methyl Chloride <sup>2</sup>	0	0	6.10	6.10	6.10	1.89

<sup>1</sup>Potential emissions from most recent construction permit.

<sup>2</sup>Methyl Chloride is no longer used or emitted.

### 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 February 27, 2017;

- 2) Construction Permit 012002-009, Issued December 14, 2001;
- 3) Construction Permit 032002-023, Issued March 27, 2002;
- 4) Construction Permit 012008-012, Issued January 29, 2008;
- 5) Construction Permit 122010-009A, Issued November 28, 2011;
- 6) 2017 Emissions Inventory Questionnaire, received April 22, 2018;
- 7) WebFIRE; and
- 8) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

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

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

#### **10 CSR 10-6.100, *Alternate Emission Limits***

This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds/10 CSR 10-6.261 Control of Sulfur Dioxide Emissions – these rules do not apply because the boilers and generators combust only natural gas or ultra-low sulfur diesel.

### **Construction Permit History**

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.

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.

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.

Construction Permit 1191-005, Issued November 12, 1991 – This construction permit was issued for a bulk storage tank for acetic acid liquors.

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.

Construction Permit 0793-005, Issued July 9, 1993 – This construction permit was issued for various equipment that was installed without permits.

Construction Permit 0294-001, Issued July 26, 1993 – This permit was issued to construct and modify three processes.

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.

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.

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.

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.

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.

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.

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.

No Construction Permit Required Determination Project Number 2580-0004-025, Issued July 14, 1997  
No Construction Permit Required Determination Project Number 1090-004-024, Issued July 14, 1997

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.

No Construction Permit Required Determination Project Number 1998-06-077, Issued October 21, 1998

Construction Permit 122000-006, Issued December 18, 2000 – This was a temporary permit to conduct trial batch operations.

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 2.

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 1.

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.

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.

Special Condition 4E refers to a Heil scrubber on EP11-5 which produced a product called TMAC. That product is no longer made and the Heil scrubber is inactive.

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.

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 4.

**New Source Performance Standards (NSPS) Applicability**

None

**Maximum Achievable Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines

40 CFR Part 63, Subpart CCCCCC NESHAP for Source Category: Gasoline Dispensing Facilities

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None

**Compliance Assurance Monitoring (CAM) Applicability**

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

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

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

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units has an uncontrolled PTE greater than the major source threshold.

**Other Regulatory Determinations**

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – the boilers (EP 5-1 and -2) are exempt because they combust only natural gas.

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes – all units are exempt under the indicated section.

<b>Emission Unit</b>	<b>MHDR (per hour)</b>	<b>Emission Factor (lbs/ton)</b>	<b>Pre-Control PTE (lbs/hr)</b>	<b>Allowable Emission Rate (lbs/hr)</b>	<b>Exemption</b>
EP 03-01	3.0000	0.45	1.35	8.56	(1)(B)(16)
EP 03-02	0.0095	7.6	0.07		(1)(B)(12)
EP 03-02	3.0000	0.90	2.70	8.56	(1)(B)(16)
EP 03-03	3.0000	0.08	0.23		(1)(B)(12)
EP 03-04					(1)(B)(15)
EP 03-07					(1)(B)(7)
EP 03-08					(1)(B)(15)
EP 03-10	3.0000	0.075	0.23		(1)(B)(12)
EP 03-11	3.0000	0.075	0.23		(1)(B)(12)
EP 03-12					(1)(B)(15)
EP 03-13	3.0000	0.075	0.23		(1)(B)(12)

Emission Unit	MHDR (per hour)	Emission Factor (lbs/ton)	Pre-Control PTE (lbs/hr)	Allowable Emission Rate (lbs/hr)	Exemption
EP 03-14					(1)(B)(7)
EP 05-01					(1)(B)(6)
EP 05-02					(1)(B)(6)
EP 05-14	0.005	42.5	0.21		(1)(B)(12)
EP 05-15	0.0100	42.5	0.43		(1)(B)(12)
EP 09-1					(1)(B)(15)
EP 09-2					(1)(B)(7)
EP 13-1					(1)(B)(15)
EP 13-2					(1)(B)(15)
EP 13-3					(1)(B)(7)
EP 16-1	0.2750	3.30	0.91	1.73	(1)(B)(16)
EP 16-2	0.0250	0.40	0.01		(1)(B)(12)
EP 16-7	0.3000	1.60	0.48		(1)(B)(12)
EP 16-8	0.3000	2.20	0.66	1.83	(1)(B)(16)
EP 26-01	1.0000	0.02	0.02		(1)(B)(12)
EP 26-02					(1)(B)(7)
EP 26-03	1.7000	0.45	0.77	5.85	(1)(B)(16)
EP 26-04	0.0057	7.60	0.04		(1)(B)(12)
EP 26-04	4.5000	0.90	4.05	11.23	(1)(B)(16)
EP 26-05	4.5000	0.08	0.34		(1)(B)(12)
EP 26-06					(1)(B)(15)
EP 26-07	0.9000	0.08	0.07		(1)(B)(12)
EP 26-08	4.5000	0.08	0.34		(1)(B)(12)
EP 26-09	4.5000	0.08	0.34		(1)(B)(12)
EP 26-10	3.0000	0.08	0.23		(1)(B)(12)

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

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

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

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

## Response to Public Comments

A draft of the Part 70 Operating Permit for BCP Ingredients, Inc. was placed on public notice on June 7, 2019, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The seven comments are addressed in the order in which they appear within the letter.

### **Comment #1:**

Permit Condition PW1 establishes a voluntary plant wide synthetic minor limit of less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of combined HAP in any 12-month rolling period. Permit Condition PW2 establishes a voluntary plant wide synthetic minor limit of less than 250 tons of volatile organic compounds (VOCs) in any rolling 12-month period. Permit Conditions PW1 and PW2 require the permittee to keep accurate records of HAP emissions and VOC emissions, respectively, using a custom tracking spreadsheet, as described in Attachment E. Attachment E details the process required by the permittee including a preferred hierarchy of emission factor determination methodology. However, in review of the custom spreadsheet provided by the permittee, the emission factors used to verify compliance with Permit Condition PW1 and PW2 are not identified. Without a documented emission factor determination or methodology included on Attachment E, it is difficult for the permit reviewer and/or field compliance inspector to evaluate compliance. Therefore, EPA recommends MoDNR seriously consider a requirement for the permittee to include their emission factor development procedure for each HAP and VOC on compliance documentation.

### **Response to Comment:**

The custom emission tracking worksheet guidelines were updated to include a requirement to identify the emission factor.

### **Comment #2:**

Permit Condition 1 includes an emission limitation where the permittee shall not emit VOCs from the encapsulation process, Emission Point EP9-1, in excess of 40 tons in any rolling 12-month period. Additionally, Permit Condition 1 includes an operational limitation where the permittee shall control emissions from EP9-1 using dust collectors. Permit Condition [1] also requires the permittee to monitor and record pressure drop across the dust collectors at least once every 24 hours while the associated equipment is in operation. Dust collectors are control devices associated with the capture and control of particulate matter (PM) and it is not clear to EPA how the control of PM also provides control of volatile organic compounds (VOC) associated with the encapsulation process, EP9-1. MoDNR has provided no discussion in the available permit record that correlates the capture of PM with VOC control.

However, following a review of Permit to Construct #012002-009, identified as the origin and authority for Permit Condition 1, it appears that Permit Condition 1 may not incorporate the special conditions of Permit to Construct #012002-009 completely and accurately. Permit to Construct #012002-009 limits VOC from the encapsulation process (EP9-1) to less than 40 tons in any consecutive 12-month period, however, Permit to Construct #012002-009, also requires the permittee to use a VOC Compliance Worksheet (Attachment A to Permit to Construct #012002-009) which tracks the amount of vegetable oil

used in the encapsulation process and uses an emission factor based on a single performance stack test to determine pounds of VOC emitted per gallon of vegetable oil used. The Emissions/Control Evaluation discussion in Permit to Construct #012002-009 appears to indicate the dust collectors have been installed to control PM10, although Permit to Construct #012002-009 does not include a PM10 emission limitation.

It appears to EPA, Permit to Construct #012002-009 requires tracking of the amount of vegetable oil usage and to calculate VOC emissions based on the emission factor developed by the stack test completed in 2002. Therefore, EPA recommends MoDNR review the special conditions placed on the permittee by Permit to Construct #012002-009 and consider whether Permit Condition 1 completely and accurately presents these special conditions. EPA also is concerned that the permittee may be relying on an emission factor developed in 2002 and suggests MoDNR may want to consider requiring the permittee to conduct an emission factor determination stack test at least once during the term of this Part 70 operating permit.

**Response to Comment:**

Permit Condition 1 and the Custom Emissions worksheet guidance were updated to include the correct monitoring and tracking requirements of CP012002-009.

**Comment #3:**

Permit Condition 2 requires the permittee to inspect the ethylene oxide system each month for emission leaks. Should results indicate a leak, the permittee shall take necessary action to remedy the causes of any such leaks and restore the operation of the system to its original performance level. It is unclear what MoDNR means by the term "ethylene oxide system" and what exactly defines a "leak." Also, MoDNR does not include any reference test method(s) to be utilized by the permittee to determine a leak of ethylene oxide. Without knowing what equipment/items are being inspected, the method(s) used for leak evaluation, and the monitoring result that signifies a leak, it is practically impossible for the permit reviewer and/or field compliance inspector to verify compliance with this permit condition. Therefore, EPA recommends MoDNR consider specifying all equipment/ items in the ethylene oxide system being monitored; an emission level that defines a leak; and the reference method(s) to be used by the permittee to achieve compliance with Permit Condition 2.

Additionally, the record keeping requirement in Permit Condition 2, specifies a record retention of two years. However, the record retention requirements of Title V / Part 70 specify five (5) years and EPA recommends MoDNR consider modifying the record keeping requirement in Permit Condition 2 to match Title V / Part 70 requirements.

**Response to Comment:**

Additional text was added to Permit Condition 2. Record retention was increased to five years.

**Comment #4:**

The permittee has taken voluntary synthetic minor hazardous air pollutant (HAP) limits and is therefore being regulated as an area HAP source. Pursuant to 10 CSR 10-6.075, MoDNR relies on EPA to be the regulating agency for all area HAP sources. Permit Condition 5 incorporates applicable requirements from 40 CFR part 63, Subpart ZZZZ-*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* and Permit Condition 6 incorporates applicable requirements from 40 CFR part 63, Subpart CCCCC-*National Emission Standards for Hazardous Air Pollutants for*

*Source Category: Gasoline Dispensing Stations.* Both Permit Condition 5 and Permit Condition 6 present area source HAP requirements and therefore, pursuant to 10 CSR 10-6.075, compliance reporting should more appropriately be submitted to the Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division at EPA with copies to MoDNR.

**Response to Comment:**

The reporting address in Permit Condition 5 was updated. No reporting is required in Permit Condition 6.

**Comment #5:**

MoDNR's customary practice is to identify the Emission Unit Specific Emission Limitations section of their Part 70 operating permits with the Roman numeral III. It then follows that the Core Permit Requirements are identified with the Roman numeral IV, and the General Permit Requirements are identified with the Roman numeral V. EPA suggests MoDNR consider returning to their customary practice in this Part 70 permit.

If MoDNR opts to leave the major section identification as presented in this draft operating permit on public notice, then EPA recommends MoDNR consider correcting the reporting reference in Permit Condition 5 from Section V to Section IV.

**Response to Comment:**

Section III heading was fixed.

**Comment #6:**

The Responsible Official section included in Section V of this draft Part 70, indicates the application utilized in the preparation of this permit was signed by Merle Barber, Plant Manager. However, the Application for Authority to Operate in EPA files, as provided by MoDNR, is signed by Jeremy Christian, Plant Manager. EPA suggests MoDNR consider providing an explanation regarding the change in Responsible Official in the operating permit record.

**Response to Comment:**

BCP Ingredients, Inc. informed the Air Program during review of the draft permit that the responsible official had changed.

**Comment #7:**

Attachment E discusses "Custom Tracking Worksheets" specifically for HAP emissions associated with Permit Condition PW1; VOC emissions associated with Permit Condition PW2; and PM10 and ethylene oxide emissions associated with Permit Condition 1. However, PM10 and ethylene oxide emission tracking is required by Permit Condition 3, so EPA suggests MoDNR consider modifying Attachment E to match the draft Part 70 permit conditions. Also, Attachment E includes the reference to CEIDARS in the hierarchy for emission factor determination. The acronym CEIDARS may not be familiar to all and therefore, EPA suggests MoDNR provide a definition of CEIDARS.

**Response to Comment:**

A definition of CEIDARS was added to the custom emissions tracking guidance.