



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: OP2018-008

Expiration Date: JAN 16 2023

Installation ID: 189-1012

Project Number: 2015-06-030

Installation Name and Address

Beltservice Corporation
4143 Rider Trail North
Earth City, MO 63045
St. Louis County

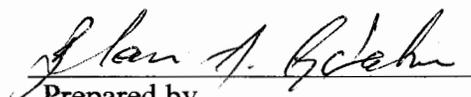
Parent Company's Name and Address

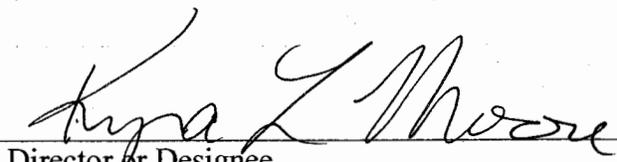
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Installation Description:

Beltservice Corporation manufactures custom rubberized conveyor belts for various industries. The belts are purchased in large rolls and then cut to specific lengths. Some belts are then sold "as is", while others are milled to a certain thickness and fitted with side walls and end cleats. Beltservice activities include cutting, forming uncured rubber by pressing/heating into molds, adding adhesives, grinding and inserting rivets. The site also includes natural-gas fired boilers and emergency generator, Maintenance shop for equipment maintenance and a lab where mostly physical type testing is conducted.

Beltservice is located in St. Louis County, a nonattainment area for the 8-hour ozone standard and the PM_{2.5} standard and an attainment area for all other criteria pollutants. Beltservice is a major source of hazardous air pollutants and particulate matter.


Prepared by
Berhanu A. Getahun
Operating Permit Unit


Director or Designee
Department of Natural Resources

JAN 16 2018

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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU001A	Fabricon Grinder - Rubber Belt Grinding Machine
EU001B	Willie and Lathe Grinders - Rubber Belt Grinding Machines
EU002	Adhesive Application
EU004	Two (2) Natural Gas Boilers
EU005	25 KW Emergency Generator
EU006	Parts Washer

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Unit
Belt Cleaning Tables (EU003)

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 Limitations.

None

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.

EU001A – Fabricon Grinder (CD-1)	
Emission Unit	Description
EU001A	Rubber Belt Grinding Machine (CD-1) - Grinding of Rubber Conveyor Belts: Cleat and Sidewall Path Grinder and Radial Arm Grinder with cyclone and baghouse. Cleat and Sidewall Path Grinder: Manufacturer: Beltservice, Model #BSC 1234 Radial Arm Grinder: Manufacturer: DeWalt, Model #WDG-AQM57Q5K CD-1: Cyclone and Baghouse: Manufacturer: Torit, Model #20-5-FB/C-1266

Permit Condition EU001A-001
10 CSR 10-6.400 Restriction of Emissions of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not cause, suffer, allow or permit the emissions of particulate matter (PM) in any one (1) hour from the Fabricon Grinder (CD-1) in excess of that allowed by the formula:
 $PM \text{ lb/hr} = 4.10P^{0.67}$, where P is the process weight in tons per hour. The limit is 2.08 pounds per hour.
- 2) The permittee shall not cause, allow or permit the emission of particulate matter from Fabricon Grinder (CD-1) in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Recordkeeping:

- 1) The permittee shall retain the potential to emit calculations which demonstrate that the above emission limitation will never be exceeded. No further recordkeeping shall be required to demonstrate compliance with the emission limitations.
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources personnel and St. Louis Department of Health (SLCDH) Air Pollution Control Program upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the SLCDH Air Pollution Control Program, 6121 North Hanley Road, Berkeley, Missouri 63134 and the Missouri Department of Natural Resources Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

EU001B – Willie and Lathe Grinders (CD-2)	
Emission Unit	Description
EU001B	Grinding of Rubber Conveyor Belts: Belt Grinder “Willie” and 24” x 120” Lathe, controlled by cyclone and baghouse. Belt Grinder “Willie”: Manufacturer: Curtin Herbert, Model #BSC 1200 24” x 120” Lathe: Manufacturer: LeBlond, Model #BSC 1718/N-1567 CD-2: Baghouse: Manufacturer: Torit, Model #B-3940

Permit Condition EU001B-001
10 CSR 10-6.400 Restriction of Emissions of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not cause, suffer, allow or permit the emissions of particulate matter (PM) in any one (1) hour from the Willie and Lathe Grinders (CD-2) in excess of that allowed by the formula: $PM \text{ lb/hr} = 4.10P^{0.67}$, where P is the process weight in tons per hour. The limit is 11.79 pounds per hour.
- 2) The permittee shall not cause, allow or permit the emission of particulate matter from Willie and Lathe Grinders (CD-2) in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Recordkeeping:

- 1) The permittee shall retain the potential to emit calculations which demonstrate that the above emission limitation will never be exceeded. No further recordkeeping shall be required to demonstrate compliance with the emission limitations.
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources personnel and St. Louis Department of Health (SLCDH) Air Pollution Control Program upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the SLCDH Air Pollution Control Program, 6121 North Hanley Road, Berkeley, Missouri 63134 and the Missouri Department of Natural Resources Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

EU002 – Adhesive-Application	
Emission Unit	Description
EU002	Adhesive-Application - Brush application of rubberized adhesive to add side walls or end cleats to belts.

Permit Condition EU002-001
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart M, Surface Coating of Miscellaneous Metal Parts

Emission Limitation:

- 1) Beltservice is subject to the General Use Coating Subcategory of this regulation, which limits organic HAP emissions from existing general use coating sources to no more than 0.31 kilograms (2.6 pounds) organic HAP per liter (gallon) coating solids used during each 12-month compliance period. [§63.3890(b)(1)]
- 2) Beltservice has chosen to demonstrate compliance using the Compliant Material Option and compliance based on the Emission Rate Without Add-on Controls Option to demonstrate that the HAP emission rate is equal to or less than the applicable emission limit in Emission Limitation 1) above. [§63.3891]

Monitoring – Compliance Requirements:

- 1) The permittee must include all coatings (as defined in this condition), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit Emission Limitation 1. To make this determination, the permittee must use at least one of the two compliance options listed in paragraphs (a) and (b) of §63.3891 listed below. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by §63.3930(c), and the permittee must report it in the next semiannual compliance report required in §63.3920. [§63.3891]
 - a) Compliant material option:

The permittee must demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Emission Limitation 1), and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option. [§63.3891(a)]
 - b) Emission rate without add-on controls option:

The permittee must demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in Emission Limitation 1), calculated as a rolling 12-month emission rate and determined on a monthly basis. The

- permittee must meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. [§63.3891(b)]
- 2) General requirements for complying with 40 CFR Part 63, Subpart M: a) The permittee must be in compliance with the emission limitations at all times. [§63.3900(a)(1)] b) The permittee must always operate and maintain the coating operation according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]
 - 3) Continuous compliance demonstration with the emission limitations using the compliant material option: [§63.3942]
 - a) For each compliance period to demonstrate continuous compliance, the permittee must use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in Emission Limitation 1), and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. If the permittee is complying with a facility-specific emission limit under §63.3890(c), the permittee must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation. [§63.3942(a)]
 - b) If the permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in §63.3942(a) is a deviation from the emission limitations that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5). [§63.3942(b)]
 - c) As part of each semiannual compliance report required by §63.3920, the permittee must identify the coating operation(s) for which the permittee used the compliant material option. If there were no deviations from the applicable emission limit in Emission Limitation 1), submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in Emission Limitation 1), and the permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a). [§63.3942(c)]
 - d) The permittee must maintain records as specified in §§63.3930 and 63.3931. [§63.3942(d)]
 - 4) Continuous compliance demonstration with the emission limitations using without add-on controls option: [§63.3952]
 - a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in Emission Limitation 1). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. The permittee must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. If the permittee is complying with a facility-specific emission limit under §63.3890(c), the permittee must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation. [§63.3952(a)]
 - b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Emission Limitation 1), this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6). [§63.3952(b)]

- c) As part of each semiannual compliance report required by §63.3920, the permittee must identify the coating operation(s) for which the permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the permittee must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Emission Limitation 1), determined according to §63.3951(a) through (g). [§63.3952(c)]
- d) The permittee must maintain records as specified in §§63.3930 and 63.3931. [§63.3952(d)]

Recordkeeping:

- 1) The permittee must collect and keep records of the data and information specified in §63.3930. Failure to collect and keep these records is a deviation from the applicable standard. [§63.3930]
 - a) A copy of each notification and report that the permittee submitted to comply with this subpart, and the documentation supporting each notification and report. If the permittee is using the predominant activity alternative under §63.3890(c), the permittee must keep records of the data and calculations used to determine the predominant activity. The permittee must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports. [§63.3930(a)]
 - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
 - c) For each compliance period, the records specified in §63.3930 (c)(1) through (4). [§63.3930(c)]
 - i) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used. [§63.3930(c)(1)]
 - ii) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941. [§63.3930(c)(2)]
 - iii) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.
 - d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
 - e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]

- f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
 - g) If the permittee uses an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), the permittee must keep records of the information specified in §63.3890 (h)(1) through (3). [§63.3930(h)]
 - i) The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.3930(h)(1)]
 - ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.3951. [§63.3930(h)(2)]
 - iii) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.3930(h)(3)]
 - h) The permittee must keep records of the date, time, and duration of each deviation. [§63.3930(j)]
- 2) The records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
 - 3) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
 - 4) The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years. [§63.3931(c)]

Reporting/Notification:

- 1) §63.3910 – Notification:

The permittee must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in §63.3910(b) and (c). [§63.3910(a)]
- 2) §63.3920 – Reports:
 - a) *Semiannual compliance reports.* The permittee must submit semiannual compliance reports for each affected source according to the requirements of §63.3920(a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in §63.3920(a)(2) of §63.3920. [§63.3920(a)]
 - i) *Dates.* The permittee shall submit compliance reports according to the dates specified in 10 CSR 10-6.065(6)(C)1.C, General Record Keeping and Reporting Requirements and 10 CSR 10-6.065(6)(C)3, Compliance Requirements, of Section V of this permit instead of according to the dates specified in §63.3920(a)(1). [§63.3920(a)(1)(iv)]
 - ii) *Inclusion with title V report.* The permittee must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If the permittee submits a semiannual compliance report pursuant to §63.3920 along with, or as part of, the semiannual monitoring report required by 40 CFR

- 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]
- iii) *General requirements.* The semiannual compliance report must contain the information specified in §63.3920(a)(3)(i) through (vii), and the information specified in §63.3920(a)(4) through (6) and (c)(1). [§63.3920(a)(3)]
- (1) Company name and address. [§63.3920(a)(3)(i)]
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3920(a)(3)(ii)]
 - (3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
 - (4) Identification of the compliance option or options specified in §63.3891 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates for each option used. [§63.3920(a)(3)(iv)]
 - (5) The calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period when using the emission rate without add-on controls compliance option. [§63.3920(a)(3)(v)]
 - (6) If the permittee used the predominant activity alternative (§63.3890(c)(1)), the permittee shall include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report. [§63.3920(a)(3)(vi)]
 - (7) If the permittee used the facility-specific emission limit alternative (§63.3890(c)(2)), the permittee shall include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period. [§63.3920(a)(3)(vii)]
- iv) *No deviations.* If there were no deviations from the emission limitations in Emission Limitation 1), the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- v) *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890 using compliant material option, the semiannual compliance report must contain the information in §63.3920(a)(5)(i) through (iv). [§63.3920(a)(5)]
- (1) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [§63.3920(a)(5)(i)]
 - (2) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports). [§63.3920(a)(5)(ii)]
 - (3) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in §63.3920 (a)(5)(i). The permittee does not

- need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports). [§63.3920(a)(5)(iii)]
- (4) A statement of the cause of each deviation. [§63.3920(a)(5)(iv)]
- vi) *Deviations: Emission rate without add-on controls option.* If the permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in §63.3920(a)(6)(i) through (iii). [§63.3920(a)(6)]
- (1) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890. [§63.3920(a)(6)(i)]
- (2) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). The permittee does need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports). [§63.3920(a)(6)(ii)]
- (3) A statement of the cause of each deviation. [§63.3920(a)(6)(iii)]

Permit Condition EU002-002

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart OOOO, Printing, Coating and Dyeing of Fabrics and Other Textiles

Emission Limitation:

Beltservice is subject to the Coating and Printing Subcategory of this regulation, and has chosen to comply with this limit using 63.4291(a)(2) Emission Rate Without Add-on Controls. Table 1 of this subpart offers several options to comply using this method. Beltservice has chosen to comply by limiting existing operations to 0.12 kilograms organic HAP per kilogram of coating solids applied calculated as a rolling twelve-month average emission rate.

Monitoring:

- 1) The organic HAP emission rate for each compliance period, determined according to §63.4331(a) for coating operations must be less than or equal to 0.12 kilograms organic HAP per kilogram of coating solids applied. Each month is a compliance period consisting of that month and the preceding 11 months. The calculations in §63.4331 must be performed on a monthly basis. [§63.4332(a)]
- 2) If the organic HAP emission rate for any compliance period exceeded 0.12 kilograms organic HAP per kilogram of coating solids applied emission limit, this is a deviation from the emission limitations for that compliance period and must be reported as specified in §§63.4310(c)(6) and 63.4311(a)(6). [§63.4332(b)]

Recordkeeping:

The permittee must collect and keep a record of the data and information specified in §63.4312. Failure to collect and keep these records is a deviation from the applicable standard.

- 1) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. [§63.4312(a)]

- 2) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, finishing, thinning, and cleaning materials; and the mass fraction of solids for coating. If Beltservice conducted testing to determine mass fraction of organic HAP of coating materials or the mass fraction of solids of coating materials, Beltservice must keep a copy of the complete test report. If Beltservice uses information provided to Beltservice by the manufacturer or supplier of the material that was based on testing, Beltservice must keep the summary sheet of results provided by the manufacturer or supplier. Beltservice is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.4312(b)]
- 3) A record of the mass fraction of organic HAP for each regulated material applied during each compliance period. [§63.4312(e)]
- 4) A record of the mass fraction of coating and printing solids for each coating and printing material applied during each compliance period. [§63.4312(f)]
- 5) If the permittee uses an allowance in Equation 1 or 4 of §63.4331 for organic HAP contained in waste materials sent to, or designated for shipment to, a treatment, storage, and disposal facility (TSDF) according to §63.4331(a)(4)(iii) or (b)(3)(ii), the permittee must keep records of the information specified in §63.4312 (g)(1) through (3). [§63.4312(g)]
 - a) The name and address of each TSDF to which the permittee sent waste materials for which the permittee used an allowance in Equation 1 or 4 of §63.4331, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility, and the date of each shipment. [§63.4312(g)(1)]
 - b) Identification of the web coating/printing or dyeing/finishing operations producing waste materials included in each shipment and the compliance period(s) in which you used the allowance for these materials in Equation 1 or 4, respectively, of §63.4331. [§63.4312(g)(2)]
 - c) The methodology used in accordance with §63.4331(a)(3)(iii) or (b)(4)(ii) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each compliance period; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.4312(g)(3)]
- 6) If the permittee uses an allowance in Equation 4 of §63.4331 for organic HAP contained in wastewater discharged to a publically owned treatment works (POTW) or treated onsite prior to discharge according to §63.4331(c), the permittee must keep records of the information specified in 63.43123(a) (h)(1) and (2) of this section. [§63.4312(h)]
 - a) Documentation that the wastewater was either discharged to a POTW or onsite secondary wastewater treatment. [§63.4312(h)(1)]
 - b) Calculation of the allowance, WW, using the fraction of organic HAP applied in affected processes that is discharged to the wastewater determined from the most recent performance test and the mass of organic HAP in the dyeing and finishing materials applied during the compliance period, A, calculated in Equation 4 of §63.4331. [§63.4312(h)(2)]
- 7) You must keep records of the date, time, and duration of each deviation. [§63.4312(i)]
- 8) The records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [63.4313(a)]
- 9) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [63.4313(b)]

- 10) The permittee must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records off site for the remaining 3 years. [63.4313(c)]

Reporting:

- 1) Semi-annual compliance reports must be submitted every six months.
 - a) Semi-annual reports are due by July 31st for monitoring which covers the January through June time period. [§63.4311(a)(1)(iii)]
 - b) Semi-annual reports are due by January 31st for monitoring which covers the July through December time period. [§63.4311(a)(1)(iii)]
- 2) Semi-annual compliance reports shall include the following information: [§63.4311(a)(3)]
 - a) Company name and address.
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - c) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30 or December 31.
 - d) Identification of the compliance option or options specified in §63.4291 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.
 - e) If you used the emission rate without add-on controls, the calculation results for each compliance period ending each month during the six-month reporting period.
 - f) If the organic HAP emission rate for any compliance period exceeds 0.12 kilograms organic HAP per kilogram of coating solids applied, this is a deviation from the emission limitation for that compliance period and must be reported in the semi-annual compliance report. The report shall include the following: [§63.4311(a)(6)]
 - i) The beginning and ending dates of each compliance period during which the organic HAP emission rate exceeded the applicable emission limit.
 - ii) The calculations used to determine the organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A and 1B, 2, and 3 in §63.4331 for coating operations. You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).
 - iii) A statement of the cause of each deviation.
 - g) If there were no deviations from the emission limit established above, you must submit a statement that the coating operations were in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit. [§63.4332(c) and §63.4311(a)(4)]

Permit Condition EU002-003

10 CSR 10-5.330

Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:

The permittee shall not cause, allow, or permit the discharge into the ambient air of any VOCs from adhesives applied to rubber in excess of 2.1 pound of VOC per gallon of coating (minus water and exempt compounds) as delivered to the coating applicator(s). [10 CSR 10-5.330(3)(K)2.]

Method and Determination of Compliance: [10 CSR 10-5.330(3)(K)3.]

- 1) VOC content of coatings - Determine the daily volume-weighted average VOC content of all coatings used in an adhesive application process, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), per 10 CSR 10-5.330(5)(C)3.A. The adhesive application process is in compliance if this value is less than or equal to the emission limits.
 - a) The daily volume-weighted average VOC content of all coatings used in a surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), shall be calculated using the following equation:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

DAVG_{vw} = daily volume-weighted average VOC content, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);

A = daily gallons of each coating used (minus water and exempt compounds) in a surface coating unit;

C = total daily gallons of coatings used (minus water and exempt compounds) in a surface coating unit;

n = number of coatings used in a surface coating unit; and

B = VOC content of the coating as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds).

- b) VOC content of the coating as applied (B), expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). This is determined using the following equation per Subparagraph (5)(C)1.A. of 10 CSR 10-5.330.

$$B = \frac{D_c \times W_o}{1 - \left(\frac{D_c \times W_w}{8.33} \right) - \left(\sum_{j=1}^m \frac{D_c \times W_{Ej}}{D_{Ej}} \right)}$$

Where:

D_c = density of coating as applied, expressed as pounds per gallon;

W_o = weight fraction of regulated VOC in the coating, as applied. This value does not include the weight fraction of water or exempt compounds;

W_w = weight fraction of water in the coating, as applied;

W_E = weight fraction of exempt compounds in the coating, as applied;

D_E = density of each exempt compound, expressed as pounds per gallon;

m = number of exempt compounds in the coating; and
8.33 = density of water, expressed as pounds per gallon.

Equipment Specification:

Application Equipment - One (1) or a combination of the following equipment shall be used for adhesive application, unless achieving compliance by using an add-on control device per Subparagraph (3)(K)3.C. of 10 CSR 10-5.330:

- 1) Electrostatic spray;
- 2) High-volume low-pressure (HVLP) spray;
- 3) Flow coat;
- 4) Roller coat or hand application, including non-spray application methods similar to hand or mechanically-powered caulking gun, brush, or direct hand application;
- 5) Dip coat, including electrodeposition;
- 6) Airless spray;
- 7) Air-assisted airless spray;
- 8) Ink jet technology; and
- 9) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.

Work Practices.

Work practices shall be used to minimize VOC emissions from solvent storage, mixing operations, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- 1) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
- 2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials;
- 3) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;
- 4) Clean up spills immediately;
- 5) Convey any coatings, thinners, and cleaning materials in closed containers from one (1) location to another; and
- 6) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Recordkeeping:

- 1) The permittee shall keep records as necessary to determine compliance. Records kept should be appropriate for the facility, their products, and operations. These may include, as applicable, one (1) or more of the following:
 - a) Current list of coatings used and the VOC content as applied;
 - b) Daily volume usage of each coating;
 - c) Records of the weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating VOC content;
 - d) Annual VOC emissions from surface coating equipment cleaning; and
 - e) All test results to determine coating properties.
- 2) Records such as daily production rates may be substituted for actual daily coating use measurements provided the owner submits a demonstration, approved by the Director, that these records are adequate for the purposes of this rule.

- 3) The permittee may use Attachments A and B, or equivalent forms of its own, so long as the forms used will accurately demonstrate compliance with the recordkeeping requirements.
- 4) The required records shall be retained by the owner or operator for a minimum of five (5) years. These records shall be made available to the director upon request.

Reporting:

The permittee shall provide a written report to the SLCDH Air Pollution Control Program, 6121 North Hanley Road, Berkeley, Missouri 63134 and the Missouri Department of Natural Resources Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the permittee determined that the emission unit exceeded the emission limitation. Any deviations from this permit condition shall also be reported in the semi-annual monitoring report and annual compliance certification as required by Section V of this permit.

EU004 – Two (2) Natural Gas Boilers	
Emission Unit	Description
EU004	Boiler #1 – 1.255 MMBtu/hr Kewanee boiler, Model # BSC 1824. Fuel: Natural Gas, Construction Date: January, 2000
	Boiler #2 – 1.874 MMBtu/hr Superior boiler, Model # BSC 1880. Fuel: Natural Gas, Construction Date: January, 2000

Permit Condition EU004-001
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Work Practice Standards:

- 1) As stated in §63.7500, the permittee must comply with the following applicable work practice standards: [Items 4 of Table 3 to Subpart DDDDD of Part 63]
 - a) The permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table, satisfies the energy assessment requirement. A facility that operated under an energy management program developed according to the ENERGY STAR guidelines for energy management or compatible with ISO 50001 for at least one year between January 1, 2008 and the compliance date specified in §63.7495 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items listed below appropriate for the on-site technical hours listed in §63.7575:
 - i) A visual inspection of the boiler or process heater system.
 - ii) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
 - iii) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
 - iv) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.

- v) A review of the facility's energy management program and provide recommendations for improvements consistent with the definition of energy management program, if identified.
 - vi) A list of cost-effective energy conservation measures that are within the facility's control.
 - vii) A list of the energy savings potential of the energy conservation measures identified.
 - viii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- 2) At all times, The permittee must operate and maintain the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the boilers. [§63.7500(a)(3)]

Notification:

- 1) If the permittee intends to use a fuel other than natural gas to fire the boiler(s) during a period of natural gas curtailment or supply interruption, as defined in §63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in §63.7575. The notification must include the information specified in §63.7545(f)(1) through (5) (listed below). [§63.7545(f)]
- a) Company name and address. [§63.7545(f)(1)]
 - b) Identification of the affected unit. [§63.7545(f)(2)]
 - c) Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began. [§63.7545(f)(3)]
 - d) Type of alternative fuel that the permittee intends to use. [§63.7545(f)(4)]
 - e) Dates when the alternative fuel use is expected to begin and end. [§63.7545(f)(5)]
- 2) If the permittee has switched fuels or made a physical change to the boiler(s) and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify: [§63.7545(h)]
- a) The name of the owner or operator of the affected source, as defined in §63.7490, the location of the source, the boiler(s) that have switched fuels, were physically changed, and the date of the notice. [§63.7545(h)(1)]
 - b) The currently applicable subcategory under this subpart. [§63.7545(h)(2)]
 - c) The date upon which the fuel switch or physical change occurred. [§63.7545(h)(3)]

Recordkeeping:

- 1) The permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]
- 2) If the permittee operates a unit in the unit designed to burn gas 1 subcategory that is subject to this subpart, and the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under this part, other gas 1 fuel, or gaseous fuel subject to another subpart of this part or part 60, 61, or 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. [§63.7555(h)]

- 3) The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§63.7560(a)]
- 4) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.7560(b)]
- 5) The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records off site for the remaining 3 years. [§63.7560(c)]

EU005 – 25 KW Emergency Generator

Emission Unit	Description
EU005	Natural Gas-fired Emergency Generator - 25 Kilowatt (KW) (34 Horse Power (HP)) Spark ignition internal combustion generator used to support the computer system in the event of power outage. Manufacturer: Generic Power Systems, Model: BSC 1897 Installation Date: 5/11/2012

Permit Condition EU005- 001

10 CSR 10-6.070 New Source Performance Regulations
 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Emission Limitation/Standards:

- 1) The permittee shall comply with the following emission standards [§60.4233(d), and Table 1 to Subpart JJJJ]

Engine Type and Fuel	Maximum Engine Power	Emission Standards ^a					
		g/HP-hr			ppmvd at 15% O ₂		
		NO _x	CO	VOC ^d	NO _x	CO	VOC ^d
GEN-01 and GEN -02	25 <HP < 130	^c 10	387	N/A	N/A	N/A	N/A

^a Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15 percent O₂.

^c The emission standards applicable to emergency engines between 25 HP and 130 HP are in terms of NO_x + HC.

^d For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

- 2) The permittee shall operate and maintain the stationary spark ignition internal combustion engine (SI ICE) to achieve the emission standards as required in §60.4233 over the entire life of the engine. [§60.4234]

Operational Limitation:

The permittee shall install a non-resettable hour meter upon startup of the emergency engine. [§60.4237(c)]

Compliance Method:

- 1) The permittee shall demonstrate compliance according to the following method: [§60.4243(b)]
 - a) Demonstrating compliance with the emission standards specified in §60.4233(e) and according to the requirements specified in §60.4244 and according to the following: [§60.4243(b)(2)]
 - i) The permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee shall conduct an initial performance test to demonstrate compliance. [§60.4243(b)(2)(i)]
- 2) The permittee must operate the emergency stationary ICE according to the requirements in §60.4243(d)(1) through (3). In order for the engine to be considered an emergency stationary ICE

under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4243(d)(1) through (3), is prohibited. If the permittee do not operate the engine according to the requirements in §60.4243(d)(1), §60.4243(d)(2)(i) and §60.4243(d)(3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [§60.4243(d)]

- a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4243(d)(1)]
- b) The permittee may operate the emergency stationary ICE for any combination of the purposes specified in §60.4243(d)(2)(i) for a maximum of 100 hours per calendar year. Any operation for nonemergency situations as allowed by §60.4243(d)(3) counts as part of the 100 hours per calendar year allowed in §60.4243(d)(2). [§60.4243(d)(2)]
 - i) Emergency stationary ICE 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 ICE beyond 100 hours per calendar year. [§60.4243(d)(2)(i)]
- 3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in nonemergency 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 §60.4243(d)(2). Except as provided in §60.4243(d)(3)(i), 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. [§60.4243(d)(3)]
 - a) 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: [§60.4243(d)(3)(i)]
 - i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [§60.4243(d)(3)(i)(A)]
 - ii) 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. [§60.4243(d)(3)(i)(B)]
 - iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§60.4243(d)(3)(i)(C)]
 - iv) The power is provided only to the facility itself or to support the local transmission and distribution system. [§60.4243(d)(3)(i)(D)]
 - v) 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 owner or operator. [§60.4243(d)(3)(i)(E)]

Performance Testing:

While conducting performance tests, the permittee shall follow the procedures in §60.4244(a) through (e). [§60.4244]

Notifications, Recordkeeping, and Reporting:

- 1) The permittee shall meet the following notification, reporting and recordkeeping requirements: [§60.4245]
 - a) The permittee shall retain records of the following information: [§60.4245(a)]
 - i) All notifications submitted to comply with this subpart and all documentation supporting any notification. [§60.4245(a)(1)]
 - ii) Maintenance conducted on the engine. [§60.4245(a)(2)]
- 2) The permittee shall retain records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§60.4245(b)]
- 3) The permittee shall submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed. [§60.4245(d)]
- 4) For engines that operate or are contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §60.4243(d)(2)(ii) and (iii) or that operates for the purposes specified in §60.4243(d)(3)(i), the permittee must submit an annual report according to the requirements in paragraphs §60.4245(e)(1) through (3).

EU006 – Parts Washer	
Emission Unit	Description
EU006	Parts Washer - Cold cleaner (maintenance)

Permit Condition EU006-001
10 CSR 10-5.300, Control of Emissions from Solvent Metal Cleaning

Emission Limitation:

- 1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)). [10 CSR 10-5.300(3)(A)1.A]
- 2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements of subparagraph (3)(A)1.A and (3)(A)1.B of 10 CSR 10-5.300. The director and the U.S Environmental Protection Agency (EPA) must approve the alternative method. [10 CSR 10-5.300(3)(A)1.D]

Operational Limitation/Equipment Specification:

The permittee shall comply with the following operational limitations and equipment specifications unless an exemption under 10 CSR 10-5.300(1)(D) applies:

- 1) Equipment specifications:
 - a) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir, which will limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [10 CSR 10-5.300(3)(A)1.C]

- b) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the Director and the EPA. [10 CSR 10-5.300(3)(A)1.D]
 - c) When one (1) or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system). [10 CSR 10-5.300(3)(A)1.E]
 - i) The solvent vapor pressure is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F) [10 CSR 10-5.300(3)(A)1.E(I)]
 - ii) The solvent is agitated. [10 CSR 10-5.300(3)(A)1.E(II)]
 - iii) The solvent is heated. [10 CSR 10-5.300(3)(A)1.E(III)]
 - d) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [10 CSR 10-5.300(3)(A)1.F]
 - e) If an internal drainage facility as in 10 CSR 10-5.300(3)(A)1.F cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [10 CSR 10-5.300(3)(A)1.G]
 - f) Solvent sprays shall be a solid fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [10 CSR 10-5.300(3)(A)1.H]
 - g) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [10 CSR 10-5.300(3)(A)1.I]
 - h) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must use one (1) of the following control devices: [10 CSR 10-5.300(3)(A)1.J]
 - i) A freeboard ratio of at least 0.75 [10 CSR 10-5.300(3)(A)1.J(I)]
 - i) Water cover (solvent must be insoluble in and heavier than water) [10 CSR 10-5.300(3)(A)1.J(II)]
 - ii) Other control system that has a mass balance demonstrated overall VOC emission reduction efficiency of at least sixty-five percent (65%) and is approved by the Director and EPA prior to use. [10 CSR 10-5.300(3)(A)1.J(III)]
- 2) Operating procedures:
- a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [10 CSR 10-5.300(3)(B)1.A]
 - b) Cleaned parts shall be drained in the free board area for at least fifteen (15) seconds, or until dripping stops, whichever is longer. [10 CSR 10-5.300(3)(B)1.B]
 - c) Whenever a cold cleaner fails to perform within the operating parameters established by 10 CSR 10-5.300, the unit shall be shut down and shall remain shut down until operation is restarted to meet 10 CSR 10-5.300's operating requirements. [10 CSR 10-5.300(3)(B)1.C]
 - d) Solvent leaks shall be repaired immediately, or the cold cleaner shall be shut down until the leaks are repaired. [10 CSR 10-5.300(3)(B)1.D]
 - e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the 10 CSR 10-5.300 or an equivalent method approved by the director and EPA. [10 CSR 10-5.300(3)(B)1.E]

- f) Waste solvent shall be stored in closed containers only. [10 CSR 10-5.300(3)(B)1.F]
- 3) Operator and Supervisor Training:
 - a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in 10 CSR 10-5.300 for the permittee's particular solvent metal cleaning process. [10 CSR 10-5.300(3)(C)1]
 - b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator. [10 CSR 10-5.300(3)(C)2]
 - c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months. [10 CSR 10-5.300(3)(C)3]

Monitoring/ Recordkeeping:

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment F): [10 CSR 10-5.300(4)(B)]
 - a) Name and address of the solvent supplier. [10 CSR 10-5.300(4)(B)1]
 - b) Date of purchase. [10 CSR 10-5.300(4)(B)2]
 - c) Type of solvent purchased. [10 CSR 10-5.300(4)(B)3]
 - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F. [10 CSR 10-5.300(4)(B)4]
- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment C). The record also shall include maintenance and repair logs that occurred on the degreaser and any associated control equipment (Attachments D). These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule. [10 CSR 10-5.300(4)(A)]
- 3) The permittee shall keep records of solvent metal cleaning training as required by 10 CSR 10-5.300(3)(C) (Attachment F).
- 4) All records shall be retained for five years and be available to the director upon request. [10 CSR 10-5.300(4)(E)]

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the to the SLCDH Air Pollution Control Program, 6121 North Hanley Road, Berkeley, Missouri 63134, and the Missouri Department of Natural Resources Air Pollution Control Program, Compliances and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as 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 immediately make such permit available 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 10-6.100 Alternate Emission Limits

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

10 CSR 10-6.110 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 requirement 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

- 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.

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 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
- 2) Exception:
 - a) Existing sources¹ in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
 - b) The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) Observations must be made once per month. If a violation is noted, then
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results using Attachment G (or its equivalent), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units;
 - b) All emission units from which visible emissions occurred; and
 - c) Whether the visible emissions were normal for the process;
 - d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment H).

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

This requirement 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

¹ Existing source in the St. Louis metropolitan area: - any equipment, machine, device, article, contrivance or installation in being, installed or in construction in the St. Louis metropolitan area on March 24, 1967, except that if the source is altered, repaired, or rebuilt at a cost of fifty percent (50%) or more of its replacement cost exclusive of routine maintenance, it shall no longer be existing, but shall be considered new as defined in this regulation..

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.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Rescinded on February 11, 1979, Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

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,

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

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

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.

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

1) Record Keeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or 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 (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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.

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

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

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

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

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

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

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

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

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

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the 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, or AirComplianceReporting@dnr.mo.gov, 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(6)(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.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by John S. Frierdich, Safety Director. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30

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

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

This permit 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.

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

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

Attachment B – Surface Coating Operations Compliance Demonstration

10 CSR 10-5.330, Control of Emissions From Industrial Surface Coating Operations - Compliance Demonstration - Sample Record Form

Date	Coating Ingredient	Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
		Enter These Values from Coating Formulation Data				Coating Volume Friction (minus water & non-VOC organic compounds)	Daily Coating Gallons Used (minus water & non-voc organic compounds)	lbs VOC per Gallon (minus water & non-voc organic compounds)	Volume-Weighted Daily lbs of VOC
		Daily Coating Gallons Used	lbs VOC per Gallon of Coating	Water Volume Fraction of Coating	Non-VOC Organic Compounds Volume Fraction of Coating				
Sum of Column F (gallons):									
								Sum of Column H (lbs)	
¹Daily Volume-Weighted Average (DAVG_{vw}) = _____ lbs of VOC/gal coating (less water & non-VOC organic Compounds)									

Note 1: Daily Volume-Weighted Average (DAVG_{vw}) = [Sum of Column H ÷ Sum of Column F]

Instructions:

1. Enter values for Columns A, B, C and D from coating formulation data.
2. Calculate volume fraction of coating (minus water & non-VOC organic compounds): [Column E = 1 – (Column C + Column D)]
3. Calculate the daily coating used (minus water & non-voc organic compounds) in gallons in Column F by multiplying daily coating used in gallons [Column A] by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column F = [Column A x Column E]
4. Calculate lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient in Column G by dividing lbs of VOC per gallon of coating (Column A) by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column G = [Column B ÷ Column E]
5. Calculate the volume weighted daily lbs of VOC in Column H per coating ingredient by multiplying the daily coating gallons used (minus water & non-VOC organic compounds) (Column F) by lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient (Column G): Column H = [Column F x Column G]
6. Calculate Daily Volume-Weighted Average (lbs of VOC per gal coating (less water & non-VOC organic compounds)) by dividing the daily sum of Column H by daily sum of Column F.

Attachment H- Method 9 Opacity Emissions Observation

10 CSR 10-6.220 Compliance Demonstration

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____

YES

NO

 Signature of Observer

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Beltservice Corporation manufactures custom rubberized conveyor belts for various industries. The belts are purchased in large rolls and then cut to specific lengths. Some belts are then sold "as is", while others are milled to a certain thickness and fitted with side walls and end cleats. Beltservice activities include cutting, forming uncured rubber by pressing/heating into molds, adding adhesives, grinding and inserting rivets. The site also includes natural-gas fired boilers and emergency generator, Maintenance shop for equipment maintenance and a lab where mostly physical type testing is conducted.

The milling operation involves the removal of rubber from the belt surface by running the belt through a grinding machine. The rubber particles are collected into a cyclone/baghouse collector located on the west wall of the building. The larger particles fallout into the cyclone hopper and are emptied into collection drums to be sent to the landfill. The smaller diameter particles are collected by the baghouse. After the belts are milled, rubberized adhesive is applied by paint brush to the sides of the belt to join a side wall to the belt to provide additional function. The rubberized adhesive is also added to a rubberized end piece that contains the end cleats. Some adhesives contain VOCs and HAPs, while other adhesives contain only VOCs.

Beltservice is located in St. Louis County, a nonattainment area for the 8-hour ozone standard and the PM_{2.5} standard and an attainment area for all other criteria pollutants. Beltservice is a major source of hazardous air pollutants and particulate matter.

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

Pollutants	Potential to Emit ¹	Reported Actual Emissions				
		2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	274.54	1.05	0.75	1.00	1.11	1.05
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	103.04	0.72	0.51	0.69	0.76	0.73
Sulfur Oxides (SO _x)	0.21	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	1.50	0.54	0.59	0.38	0.56	0.51
Volatile Organic Compounds (VOC)	8.03	3.47	5.85	5.13	4.36	4.98
Carbon Monoxide (CO)	7.98	0.45	0.50	0.32	0.47	0.43
Hazardous Air Pollutants ² (HAP's)	57.72	18.64	20.33	19.42	21.94	26.18
Ammonia (NH ₃)	0.01	0.01	0.01	0.01	0.01	0.01

Note:

1. Each emission unit except the emergency generator was evaluated at 8,760 hours of uncontrolled annual operation. Emissions from the emergency generator are evaluated at 500 hours of annual operation.
2. The HAPs emissions were reported as VOCs on Form 2T pages of the Emission Inventory Questionnaires in the applicable years (2016-2012).

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 June 5, 2015;
- 2) 2016 Emissions Inventory Questionnaire, received April 19, 2017;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) St. Louis County Air Pollution Control Program Construction/Operating Permit 5130;
- 5) St. Louis County Air Pollution Control Program Construction/Operating Permit 6372;
- 6) St. Louis County Air Pollution Control Program Construction/Operating Permit 6583;
- 7) St. Louis County Air Pollution Control Program Construction/Operating Permit 7244; and
- 8) St. Louis County Air Pollution Control Program Construction/Operating Permit 7719.

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

Construction Permit History

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

St. Louis County Air Pollution Control Program Construction Permits 5130 and 6583:

These construction permits were modified to more accurately describe the permitted emission units and associated control devices.

10 CSR 10-6.070, *New Source Performance Regulations*

The installation is potentially subject to several NSPS rules. Below is a summary of the potentially applicable subparts and the facilities applicability and compliance status to those subparts.

- 1) 40 CFR Part 60, Subpart A, *General Provisions*.

The installation becomes subject to Subpart A - General Provisions upon becoming subject to an NSPS standard. If the installation is subject to various NSPS Standards; therefore, they are also subject to Subpart A.

- 2) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial/Commercial/Institutional Steam Generating Units*

This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). None of the boilers has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

- 3) 40 CFR Part 60, Subpart III. *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*.

This subpart is applicable to owners and operators of stationary compression ignition (CI) internal

combustion engines (ICE) and other persons who construct, reconstruct, or modify an engine after July 11, 2005. A compression ignition is a type of stationary internal combustion engine that is not a spark ignition engine.

Beltservice does not operate a compression ignition internal combustion engine. Therefore, this subpart does not apply.

4) 40 CFR Part 60, Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines:*

This subpart is applicable to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) who construct, reconstruct, or modify an engine after July 12, 2006. A stationary internal combustion engine is any internal combustion engine, except combustion turbines, that converts heat energy into mechanical work and is not mobile. Stationary ICE include reciprocating ICE, rotary ICE, and other ICE, except combustion turbines.

The natural gas fired spark ignition internal combustion engine (emergency generator identified as EU005) at this installation does meet the construction and manufacture date identified in this subpart. Thus, the generator is subject to 40 CFR Part 60, Subpart JJJJ.

Maximum Achievable Control Technology (MACT) Applicability

1) 40 CFR Part 63, Subpart MMMM, *National Emission Standards for the Surface Coating of Miscellaneous Metal Parts:*

This regulation applies to Beltservice as indicated in the permit. Beltservice is exempt from the Rubber-to-Metal Coating Subcategory of this regulation since the volume of product used does not exceed 50 gallons per year of a single coating and 250 gallons per year of total coatings. (63.3881(c)(3))

Subpart MMMM requires Beltservice to maintain records of coatings and solvents used to coat metal parts; HAP content and emissions and to submit a semi-annual report. Beltservice maintains 12-month rolling totals to show compliance with MMMM. For the general use coating part of MMMM, Beltservice uses compliant materials. Emissions are limited to no more than 2.6 pounds per gallon of coating solids.

2) 40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

This Subpart applies to a facility that owns or operates industrial boilers, institutional boilers, commercial boilers, and process heaters that is located at a major source, or is part of, a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water.

This regulation applies to the boilers (EU004) at this facility. The boilers have a maximum design heat input capacity of less 10 million Btu/hr. Existing units with a heat input capacity less than 10 MMBtu/hr do not have specific emission limits but are required to have a one-time energy assessment performed by a qualified energy assessor.

- 3) 40 CFR Part 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

This regulation applies to boilers at area source facilities that burn coal, oil, biomass, or non-waste materials. Boilers burning gaseous fuels as defined in this regulation would not be affected by the rule.

This regulation does not apply to the boilers (EU004) because Beltservice is a major source HAPs.

- 4) 40 CFR Part 63, Subpart OOOO, *National Emission Standards for Printing, Coating, and Dyeing of Fabrics and Other Textiles:*

This regulation applies to this facility as indicated in the this permit. Beltservice demonstrates initial compliance with the regulation (§63.4330 and §63.4331) in the Notification of Compliance Status (NOCS) received on July 2, 2007.

Beltservice uses a detailed system of mass balance calculations from their purchasing and shipping records, to determine compliance with this subpart. This plan is on file with Saint Louis County Air Pollution Control Program.

- 5) 40 CFR Part 63, Subpart PPPP, *National Emission Standards for the Surface Coating of Plastic Parts and Products:*

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for plastic parts and products surface coating facility that is a major source, is located at a major source, or is part of a major source of hazardous air pollutants (HAP) and uses 100 gallons per year or more of coatings that contain HAP to coat plastic parts or products.

This regulation does not apply to this facility. Beltservice submitted an initial notification for this subpart in February of 2005. Since the initial notification was made, methyl ethyl ketone (MEK) has been removed from the list of hazardous air pollutants. Since MEK is no longer considered a HAP and the plastic coating operations contain no HAP on the compliance date. Therefore, this facility is not subject to this regulation.

- 6) 40 CFR Part 63, Subpart T - *National Emission Standards for Halogenated Solvent Cleaning*

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent are not covered under the provisions of this subpart.

The maintenance cold cleaner unit does not use halogenated solvents as defined in 40 CFR 63.460, therefore the parts washer is not subject to the MACT standards for halogenated solvent cleaning.

7) 40 CFR Part 63, Subpart ZZZZ - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)*.

The Subpart ZZZZ standards are applicable to Reciprocating Internal Combustion Engines (RICE) located at both major and/or area sources of hazardous air pollutants (HAPs) and RICE with a site rating of less than or equal to 500 brake horsepower (bhp).

The natural gas fired spark ignition internal combustion engine (emergency generator identified as EU005) that is subject to the 40 CFR Part 60, Subpart JJJJ is automatically compliant with the requirements of 40 CFR Part 63, Subpart ZZZZ and according to §63.6590(c)(1) of Subpart ZZZZ of 40 CFR Part 63, no further requirements apply for the engine under this part for “new” spark ignition engines.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

1) 40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos*.

The installation is not subject to any NESHAP standard with the exception of Subpart M - National Emission Standard for Asbestos. The installation is potentially subject to Subpart M. If the installation conducts any demolition or renovation projects to a building(s) containing asbestos, they must determine applicability with the following NESHAP regulations:

- Demolition and Renovation - 40 CFR 61.145 (see Section IV Core Permit Requirements).
- Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying - 40 CFR 61.150.

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

The Fabricon Grinder, Willie Grinder and Lathe Grinder are subject to a PM limit of 10 CSR 10-6.400, *Restriction of Emission Of Particulate Matter From Industrial Processes*. The 10 CSR 10-6.400 applicability determination (Item 2 of Other Regulatory Determinations) provides the calculations of the PM emission limits that were used in the CAM applicability analysis. Since the grinding units are subject to a PM limit, these emission units meet CAM Criteria #1. Since the grinders meet CAM Criteria #1, the uncontrolled potential to emit (PTE) was compared to the major source threshold of 100 tons per year (tpy) to determine if the units meet CAM Criteria #3. The Willie Grinder and Lathe Grinder with an uncontrolled PTE for PM greater than 100 tons per year were reviewed to determine if the units had a control device for PM or PM10 whose primary purpose was to achieve compliance with the applicable PM or PM10 limitation (CAM Criteria #2).

In order for CAM Criteria #2 to be satisfied, an emission unit subject to an emission standard must require a control device to meet the emission standard, where control device is defined as “equipment, other than inherent process equipment, that is used to destroy or remove air pollutant prior to discharge to the atmosphere.” It is possible for a piece of process equipment to be perceived as a control device, simply because it accomplishes emission reduction. However, equipment that is inherent to the process operation that achieves emission reduction as a co-benefit is not considered control equipment.

The dust collectors associated with the grinders are used for the safety purpose of reducing the amount of particulate dust exposure to Beltservice's employees. That being the case, the grinders would not be run if the dust collectors are not in operation. . Therefore, the baghouses do not meet CAM Criteria #2 (i.e. the baghouses do not meet the 40 CFR 64 definition of control device), and the grinders are not subject to CAM requirements.

Other Regulatory Determinations

- 1) 10 CSR 10-5.455, *Control of Emissions from Solvent Cleanup Operations*
This installation currently does not emit greater than 500 pounds of cleaning solvent VOCs per day; therefore, this regulation does not apply.
- 2) 10 CSR 10-6.400, *Restriction of Emission Of Particulate Matter From Industrial Processes*
10 CSR 10-6.400 applicability determination.

PM Emission factor determination for the Grinders (EU001) with dust collectors CD-1 and CD-2. The dust collectors are used for the safety purpose of reducing the amount of particulate dust exposure to Beltservice's employees. That being the case, the grinders would not be run if the dust collectors are not in operation.

The conveyor belt is weighed before and after it is ground during the eight hour operation. The weight loss number is used as the amount of dust (PM) that enters the collector.

Belt Weight Before Grind	= 4984 pounds (2.492 tons)
Belt Weight After Grind	= 4954 pounds
Weght Sent to Dust Collector	= 30 pounds
PM Emitted Per Pound of Belt	= 30 lbs/2.492 tons = 0.00619 lb/lb (12.03852 lbs/ton)

- a) Fabricon Grinder (Grinding of Rubber Conveyor Belts): Cleat and Sidewall Path Grinder and Radial Arm Grinder with cyclone and baghouse (CD-1).

The process weight (P) rate for dust collector CD-1 is calculated by measuring the maximum surface area that may pass under the grinding head of the equipment in an hour and multiplying that number by the density of the heaviest belt that would pass under the grinding head.

The maximum drive speed for the Fabricon Grinder will be obtained when grinding paths that travel the length of the belt (either a flange or V-guide path). When grinding in this fashion, the unit can grind 100 linear feet of belt in 20 minutes.

The widest path width that can be ground on the Fabricon Grinder will be two flange paths at the same time. The largest grinding wheel that can be used is 3.5 inches wide.

The heaviest belt that would be ground in this fashion would be a 4 Ply 440, 3/8" X 3/32". This belt weighs 4.16 pounds per square foot.

$$P = \frac{100 \text{ feet}}{20 \text{ minutes}} \times \frac{60 \text{ minutes}}{1 \text{ hour}} \times 7 \text{ inches grinding width} \times \frac{1 \text{ foot}}{12 \text{ inches}} \times \frac{4.16 \text{ pounds}}{\text{square foot}}$$
$$= 728 \text{ pounds per hour}$$
$$= 0.364 \text{ tons per hour}$$

The following formula from 10 CSR 10-6.400 is used to calculate the PM allowable limit:

$E = 4.10P^{0.67}$ for process weight rates up to 30 tons (60,000 lbs) per hour, and

Where: E = PM allowable rate of emission in lb/hr; and

P = process weight rate in tons/hr (maximum hourly design rate)

$$E = 4.10 \times 0.364^{0.67} = 2.083 \text{ pounds per hour}$$

Control Device (Cyclone/Baghouse) Efficiency = 95%

PM Uncontrolled PTE = 0.364 tons/hr x 12.03852 lbs/ton = 4.38 lbs/hr (19.18 tons/year)

PM Controlled PTE = 4.38 lbs/hr x (1 - 0.95) = 0.219 lbs/hr

- b) The process weight rates for Willie Grinder and Lathe Grinder with dust collector CD-2 are calculated by measuring the maximum surface area that may pass under the grinding head of the equipment in an hour and multiplying that number by the density of the heaviest belt that would pass under the grinding head. Dust Collector CD-2 collects dust from the two grinding machines, Willie and Lathe. It is possible for both of these machines to be in operation at the same time. Therefore, the maximum process weight for CD-2 will be the sum of the maximum process weight for the two grinders.

Maximum process weight rate for Willie Grinder:

The maximum drive speed for the Willie Grinder was determined when grinding 170 linear feet of belt in 34 minutes.

Full grinding width of the Willie Grinder is 68 inches. The heaviest belt that would be ground in this fashion would be a 4 Ply 440, 3/8" X 3/32". This belt weighs 4.16 pounds per square foot.

$$P_{\text{Willie}} = \frac{170 \text{ feet}}{34 \text{ minutes}} \times \frac{60 \text{ minutes}}{1 \text{ hour}} \times 60 \text{ inches grinding width} \times \frac{1 \text{ foot}}{12 \text{ inches}} \times \frac{4.16 \text{ pounds}}{\text{square foot}}$$
$$= 7072 \text{ pounds per hour}$$
$$= 3.54 \text{ tons per hour}$$

Maximum process weight rate for Lathe Grinder:

The maximum drive speed used for the Lathe Grinder was determined to be 34 revolutions per minute (RPM), with each revolution being equal to 3 feet. Full grinding width for the grinding head on the Lathe is 2 inches wide. The heaviest belt that would be ground in the Lathe would be a 4 Ply Hot Stock & Water Belt with a 1/4" thick polyurethane cover. This belt weighs 2.55 pounds per square foot.

$$\begin{aligned} P_{Lathe} &= 34 \text{ RPM} \times \frac{3 \text{ feet}}{\text{revolution}} \times \frac{60 \text{ minutes}}{1 \text{ hour}} \times 2 \text{ inches grinding width} \times \frac{1 \text{ foot}}{12 \text{ inches}} \times \frac{4.16 \text{ pounds}}{\text{square foot}} \\ &= 2603 \text{ pounds per hour} \\ &= 1.30 \text{ tons per hour} \end{aligned}$$

Therefore, P for both Willie and Lathe = 3.54 tons/hr + 1.30 tons/hr = 4.84 tons/hr

$$E = 4.10 \times 4.84^{0.67} = 11.79 \text{ pounds per hour}$$

Control Device (Baghouse) Efficiency = 95%

PM Uncontrolled PTE = 4.84 tons/hr x 12.03852 lbs/ton = 58.27 lbs/hr (255 tons/yr)

PM Controlled PTE = 58.27 lbs/hr x (1 - 0.95) = 2.91 lbs/hr

- 3) 10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions From Existing Major Sources*. This rule applies to any installation in the counties of St. Charles, St. Louis, Franklin, or Jefferson or the City of St. Louis that have the potential to emit greater than one hundred (100) tons per year of volatile organic compounds. This rule does not apply to any installation that meets one or more of the following:
- One or more rule under Title 10, Division 10, Chapter 5 of the *Code of State Regulations* (CSR) applies to volatile organic compound (VOC) emissions from a product process, or a raw material, intermediate or product tank;
 - Is exempted from one or more rule under Title 10, Division 10, Chapter 5 of the CSR as it applies to VOC emissions from a product process, or a raw material, intermediate or product tank; or
 - Is affected by any federal rulemaking promulgated under 40 CFR Part 60, 40 CFR Part 61, or 40 CFR Part 63 applies to VOC emissions from a product process, or a raw material, intermediate or product tank.

Therefore, 10 CSR 10-5.520 is not applicable to this installation as 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*, 40 CFR Part 63, Subpart MMMM and 40 CFR Part 63, Subpart OOOO are applicable and the installation is exempt from 10 CSR 10-5.520.

- 4) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit for the following emission units:

Emission Unit	Description	10 CSR 10-6.220 Applicability
EU004	Two (2) Natural Gas Boilers	These sources are potentially subject to this regulation. Particulate emissions were calculated to be less 0.5 lbs/hr from each source; therefore, the emission units are assumed to be in compliance with this regulation without any monitoring.
EU005	25 KW Emergency Generator	10 CSR 10-6.220(1)(A) exempts stationary internal combustion engines operated in the St. Louis metropolitan area.

- 5) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
 10 CSR 10.6.261, *Control of Sulfur Dioxide Emissions.*

These rules are not applicable to the installation. The boilers (EU004) and internal combustion engine (EU005) combust only natural gas. Thus, they are exempt from regulation 10 CSR 10-6.260(1)(A)2. and regulation 10 CSR 10-6.261(1)(A).

- 6) 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions Fuel Burning Equipment Used for Indirect Heating*

The installation operates two boilers (EU004). The boilers combust only natural gas and therefore are exempt from demonstrating compliance with this rule.

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

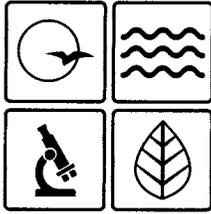
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

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

The draft Part 70 Operating Permit for Beltservice Corporation was placed on public notice as of November 17, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm> on Friday, November 17, 2017. The Air Pollution Control Program did not receive any public comments during the 30-day comment period.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JAN 16 2018

Mr. John S. Frierdich
Beltservice Corporation
4143 Rider Trail North
Earth City, MO 63045

Re: Part 70 Operating Permit
Installation ID: 189-1012, Permit Number: OP2018-008

Dear Mr. Frierdich:

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.

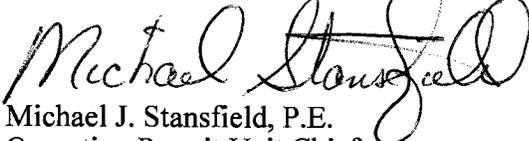
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request 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 do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:bjj

Enclosures

c: PAMS File: 2015-06-030

