

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

APR 07 2015

Mr. Kenneth W. Jones  
Vice President of Operations  
Brenntag Mid-South, Inc.  
139 E. Soper St.  
St. Louis, MO 63111

Re: 2011-07-067 Brenntag Mid-South, Inc. (510-1093)  
Permit Number: OP2015-005

Dear Mr. Jones:

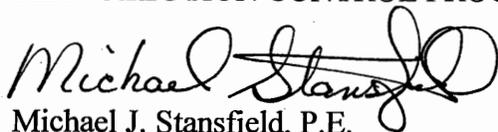
Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements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

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

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:ah

Enclosures

c: Robert Cheever, US EPA Region VII  
St. Louis Regional Office  
PAMS File: 2011-07-067



## 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:** OP2015-005  
**Expiration Date:** APR 07 2020  
**Installation ID:** 510-1093  
**Project Number:** 2011-07-067

**Installation Name and Address**

Brenntag Mid-South, Inc.  
139 E. Soper St.  
St. Louis, MO 63111  
City of St. Louis

**Parent Company's Name and Address**

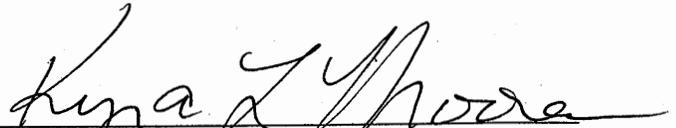
Brenntag Mid-South, Inc.  
1405 Hwy 136 West  
Henderson, KY 42420

**Installation Description:**

Brenntag Mid-South, Inc. operates a chemical distribution facility in St. Louis, MO. The installation receives a variety of solvents, caustics, and acids in bulk. The chemicals are unloaded and stored in tanks. Custom solvent mixtures are blended onsite. Chemicals are distributed into containers, trucks, rail cars, and barges. The installation is a major source of VOC and a synthetic minor source of HAP (Methanol (67-56-1) and Toluene (108-88-3)).



Prepared by  
Alana L. Hess  
Environmental Engineer III  
Operating Permits Unit



Director or Designee  
Department of Natural Resources

APR 07 2015

Effective Date

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>3</b>
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>5</b>
PERMIT CONDITION PW001 .....	5
10 CSR 10-6.065(6)(C)2.A Voluntary Permit Condition.....	5
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>6</b>
PERMIT CONDITION 001 .....	6
10 CSR 10-5.500 Control of Emissions From Volatile Organic Liquid Storage .....	6
PERMIT CONDITION 002.....	8
10 CSR 10-6.060 Construction Permits Required.....	8
City of St. Louis Construction Permit 97-05-051 .....	8
PERMIT CONDITION 003.....	9
10 CSR 10-6.060 New Source Performance Regulations .....	9
40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.....	9
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>10</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>16</b>
<b>VI. ATTACHMENTS .....</b>	<b>21</b>
ATTACHMENT A .....	22
Abbreviations and Acronyms.....	22
ATTACHMENT B1 .....	23
Plantwide HAP Tracking Sheet .....	23
ATTACHMENT B2 .....	24
HAP Emission Factors.....	24
ATTACHMENT C .....	25
Railcar Loading Hours of Operation Tracking Sheet.....	25

# I. Installation Description and Equipment Listing

## INSTALLATION DESCRIPTION

Brenntag Mid-South, Inc. operates a chemical distribution facility in St. Louis, MO. The installation receives a variety of solvents, caustics, and acids in bulk. The chemicals are unloaded and stored in tanks. Custom solvent mixtures are blended onsite. Chemicals are distributed into containers, trucks, rail cars, and barges. The installation is a major source of VOC and a synthetic minor source of HAP (Methanol (67-56-1) and Toluene (108-88-3)).

The installation is not on the List of Named Installations at 10 CSR 10-6.020(3)(B) Table 2; therefore, fugitive emissions do not count towards major source applicability.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
PM <sub>10</sub>	0.04	0.04	0.001	-	-
PM <sub>2.5</sub>	0.04	0.04	-	-	-
SO <sub>x</sub>	0.003	0.003	0.001	-	-
NO <sub>x</sub>	0.52	0.51	0.002	-	-
VOC	1.36	0.73	3.95	0.09	0.32
CO	0.43	0.43	0.001	-	-
HAP	4.19	4.19	3.97	0.41	0.41
Methanol (67-56-1)	4.10	4.10	3.92	0.21	0.21
Hydrogen Chloride (7647-01-0)	0.09	0.09	0.03	-	-
Toluene (108-88-3)	-	-	0.02	0.02	0.02
Dichloromethane (75-09-2)	-	-	-	0.001	0.001
Hexane (110-54-3)	-	-	-	0.15	0.15
Xylene (1330-20-7)	-	-	-	0.02	0.02

## 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 in addition to plant wide emission limitations.

Emission Point	Description
27	815,000 gallon Methanol Tank
B01	Boiler #1 – 10.5 MMBtu/hr natural gas
R01	Railcar Loading – Methanol Pump (360 gpm) and Propylene Glycol Pump (240 gpm)

**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. These emission sources are subject to the plant wide emission limitations in Section II of this permit.

<b>Emission Point</b>	<b>Description</b>
7	620,000 gallon Propylene Glycol Tank
16	450,000 gallon Aatrex Tank
22	50,000 gallon Solvent 142 Tank
26	50,000 gallon Aromatic 100 Tank
33	30,000 gallon Toluene Tank
34	30,000 gallon Isopropanol Tank
39	20,000 gallon Aromatic 100 Tank
41	20,000 gallon Ethyl Acetate Tank
45	20,000 gallon Exxsol D-95 Tank
46	20,000 gallon Ethanol SDA 3C Tank
47	20,000 gallon Glycol Ether DB Tank
48	20,000 gallon Heptane Tank
50	20,000 gallon Exxsol D-95 Tank
51	20,000 gallon Ethanol SDA 40B Tank
52	20,000 gallon Diethylene Glycol Tank
53	20,000 gallon Isopar M Tank
54	20,000 gallon Isopar M Tank
56	20,000 gallon Diethylene Glycol Tank
57	20,000 gallon Diethylene Glycol Tank
59	12,000 gallon Ethanol SDA 3A Tank
64	8,500 gallon Propylene Glycol Tank
D01	Container Filling – Propylene Glycol Pump (130 gpm), Isopropanol Pump (130 gpm), Glycerine Pump (60 gpm), Soybean Oil Pump (60 gpm), Mineral Oil Pump (60 gpm), and Miscellaneous Materials Pumps (450 gpm total)
T01	Truck Loading – Propylene Glycol Pump (240 gpm), Methanol Pump (360 gpm), Toluene Pump (260 gpm), Isopropanol Pump (260 gpm), Acetone Pump (260 gpm), Ethanol SDA 3C Pump (260 gpm), Ethanol SDA 40B Pump (260 gpm), Ethanol SDA 3A Pump (260 gpm), and Propylene Glycol Tech Pump (130 gpm)
B02	Barge Loading – Propylene Glycol Pump (240 gpm) and Methanol Pump (360 gpm)

## II. Plant Wide Emission Limitations

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

### PERMIT CONDITION PW001

10 CSR 10-6.065(6)(C)2.A Voluntary Permit Condition

#### **Emission Limitation:**

1. The permittee shall emit less than 10.0 tons of each individual HAP from the entire installation during any consecutive 12-month period.
2. The permittee shall emit less than 25.0 tons of combined HAP from the entire installation during any consecutive 12-month period.

#### **Monitoring/Recordkeeping:**

1. The permittee shall maintain records of the installation actual monthly and 12-month rolling total emissions of each individual HAP and combined HAPs using Attachment B1 or an equivalent form approved by the Missouri Air Pollution Control Program.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

#### **Recordkeeping:**

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

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 001</b>	
10 CSR 10-5.500 Control of Emissions From Volatile Organic Liquid Storage	
Emission Unit	Description
EP-027	815,000 gallon Methanol Tank

**General Provisions:**

1. The permittee shall reduce VOC emissions from the storage tank as follows: [§5.500(3)(A)]
  - a) The fixed roof tank shall be equipped with an internal floating roof that meets the following specifications: [§5.500(3)(A)1]
    - i) The internal floating roof shall rest or float on the liquid surface but not necessarily in complete contact with it inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying or refilling shall be continuous and shall be accomplished as rapidly as possible; [§5.500(3)(A)1.A]
    - ii) The internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: [§5.500(3)(A)1.B]
      - (1) A liquid-mounted seal; [§5.500(3)(A)1.B(I)]
    - iii) Each opening in a non-contact internal floating roof except for automatic bleeder vents such as vacuum breaker vents and the rim space vents shall provide a projection below the liquid surface; [§5.500(3)(A)1.C]
    - iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid which is to be maintained in a closed position at all times with no visible gap except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use; [§5.500(3)(A)1.D]
    - v) Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports; [§5.500(3)(A)1.E]
    - vi) Rim space vents shall be equipped with a gasket and shall be set to open only when the internal floating roof is not floating or at the manufacturer’s recommended setting; [§5.500(3)(A)1.F]
    - vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90% of the opening; and [§5.500(3)(A)1.G]
    - viii) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover; [§5.500(3)(A)1.H]

**Performance Testing:**

1. The permittee shall— [§5.500(3)(C)1]
  - a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) prior to filling the storage vessel with VOL. If there are holes, tears or other openings in the primary seal, the secondary seal or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel; [§5.500(3)(C)1.A]
  - b) Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in §5.500(3)(C) cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the permittee may request a 30-day extension from the Air Pollution Control Program in the inspection report required in §5.500(4)(A)2. Such a request for an extension shall document that alternate storage capacity is unavailable and specify a schedule of actions the permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied within 30 days; [§5.500(3)(C)1.B]
  - c) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the slotted membrane has more than 10% open area, the permittee shall repair the items as necessary so that none of the conditions specified in §5.500(3)(C) exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten years in the case of vessels subject to the annual visual inspection as specified in §5.500(3)(C)1.B. [§5.500(3)(C)1.D]
  - d) Notify the department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §5.500(3)(C)1.A and (3)(C)1.D to afford the Air Pollution Control Program the opportunity to have an observer present. If the inspection required by §5.500(3)(C)1.D is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the Air Pollution Control Program at least seven days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Air Pollution Control Program at least seven days prior to the refilling. [§5.500(3)(C)1.E]

**Test Methods:**

The permittee shall comply with the test methods and procedures of §5.500(5).

**Monitoring:**

1. Available data on the storage temperature may be used to determine the maximum true vapor pressure. [§5.500(4)(H)2]
  - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature.

For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§5.500(4)(H)2.A]

- b) For other liquids, the vapor pressure shall be determined by an appropriate test method in §5.500(5) or calculated by an appropriate method approved by the Air Pollution Control Program. [§5.500(4)(H)2.B]

**Recordkeeping and Reporting:**

1. The permittee shall maintain all records required by §5.500(4), except for the records required by §5.500(4)(F), on-site for at least five years. The records required by §5.500(4)(F) shall be kept on-site for the life of the source. The records required by §5.500 shall be made available to Department of Natural Resources’ personnel immediately upon request. [§5.500(4)]
  - a) The permittee shall—[§5.500(4)(A)]
    - i) Keep a record of each inspection performed as required by §5.500(3)(C)1.A, (3)(C)1.B, and (3)(C)1.D. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment including seals, internal floating, and fittings; [§5.500(4)(A)1]
    - ii) If any of the conditions described in §5.500(3)(C)1.B are detected during the annual visual inspection required by §5.500(3)(C)1.B, report to the Air Pollution Control Program within 20 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made; and[§5.500(4)(A)2]
  - b) The permittee shall maintain records of tank cleaning operations to document the date when control devices are required. [§5.500(4)(E)]
  - c) The permittee shall maintain readily accessible records of the dimensions of the storage vessel and an analysis of the capacity of the storage vessel. [§5.500(4)(F)]
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b> 10 CSR 10-6.060 Construction Permits Required City of St. Louis Construction Permit 97-05-051	
Emission Unit	Description
R01	Railcar Loading – Methanol Pump (360 gpm) and Propylene Glycol Pump (240 gpm)

**Operational Limitation:**

1. Special Condition II.A: The permittee shall limit the use of R01 Railcar loading to 2,600 hours per consecutive 12-month period.
2. Special Condition III.A: The permittee shall operate and maintain the pumps according to the manufacturer’s specifications.
3. Special Condition III.B: The permittee shall periodically inspect the pumps for leaks.

**Recordkeeping:**

1. The permittee shall maintain records of the monthly and 12-month rolling total hours of operation using Attachment C or an equivalent form approved by the Missouri Air Pollution Control Program.
2. The permittee shall maintain a copy of the pump manufacturer’s specifications on site.

3. Special Condition IV.B: The permittee shall maintain an operating and maintenance log for the pumps which shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

**Recordkeeping:**

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

<b>PERMIT CONDITION 003</b>	
10 CSR 10-6.060 New Source Performance Regulations 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	
Emission Unit	Description
B01	Boiler #1 – 10.5 MMBtu/hr natural gas

**Recordkeeping:**

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

**Reporting:**

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

## IV. Core Permit Requirements

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

### 10 CSR 10-6.045 Open Burning Requirements

1. General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    - i) St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - b) Yard waste, with the following exceptions:
    - i) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed 16 ft<sup>2</sup>. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
3. Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the permittee fails to comply with the conditions or any provisions of the permit.
4. The permittee may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if the permittee fails to comply with the provisions or any condition of the open burning permit.
  - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)10, the director shall not issue a permit unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Recordkeeping. NSPS CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of NSPS CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS CCCC, sources shall conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.

6. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by NSPS Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of NSPS Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin

operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than 18 months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

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

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

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

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

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

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

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

**10 CSR 10-6.150 Circumvention**

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

**10 CSR 10-6.180 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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment 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. 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  
(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.

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

**This requirement is not federally enforceable.**

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

**10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

1. The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:
  - a) Areas in which there are one or more existing sources and/or proposed new sources of PM in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
  - b) Areas in which there are one or more existing sources and/or proposed new sources of SO<sub>2</sub> in any circular area with a diameter of two miles from which the sum of SO<sub>2</sub> emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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

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

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in 40 CFR Part 82, Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
- d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
- e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A - Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B - Servicing of MVACs. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program promulgated pursuant to 40 CFR Part 82, Subpart G - Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

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

## V. General Permit Requirements

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

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

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

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

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

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

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

1. The permittee shall comply with the requirements of 40 CFR Part 68 - Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by §68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:
  - a) June 21, 1999;
  - b) Three years after the date on which a regulated substance is first listed under §68.130; or
  - c) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

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

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

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

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

None.

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

1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3. All progress reports required under an applicable schedule of compliance shall be submitted 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

1. An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable

permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

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

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

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

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

The application utilized in the preparation of this permit was signed by James Mulcahy, Safety, Regulatory, & Quality Manager. If this person terminates employment, or is reassigned different duties

such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the permittee shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the permittee to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

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

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

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

## **VI. Attachments**

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

**Attachment A**  
Abbreviations and Acronyms

<b>°C</b> .....degrees Celsius	<b>µg/m<sup>3</sup></b> .....micrograms per cubic meter
<b>°F</b> ..... degrees Fahrenheit	<b>m/s</b> .....meters per second
<b>AAQIA</b> ..... ambient air quality impact analysis	<b>mg</b> .....milligrams
<b>acfm</b> ..... actual cubic feet per minute	<b>Mgal</b> .....1,000 gallons
<b>BACT</b> ..... Best Available Control Technology	<b>MW</b> .....megawatt
<b>BMPs</b> ..... Best Management Practices	<b>MHDR</b> .....maximum hourly design rate
<b>Btu</b> ..... British thermal unit	<b>MMBtu</b> .....Million British thermal units
<b>CAM</b> ..... Compliance Assurance Monitoring	<b>mmHg</b> .....millimeters mercury
<b>CAS</b> ..... Chemical Abstracts Service	<b>MMscf</b> .....Million standard cubic feet
<b>CEMS</b> ..... Continuous Emission Monitor System	<b>MSDS</b> .....Material Safety Data Sheet
<b>CFR</b> ..... Code of Federal Regulations	<b>NAAQS</b> .....National Ambient Air Quality Standards
<b>CO</b> ..... carbon monoxide	<b>NESHAPs</b> .National Emissions Standards for Hazardous Air Pollutants
<b>CO<sub>2</sub></b> ..... carbon dioxide	<b>NO<sub>x</sub></b> .....nitrogen oxides
<b>CO<sub>2e</sub></b> ..... carbon dioxide equivalent	<b>NSPS</b> .....New Source Performance Standards
<b>COMS</b> ..... Continuous Opacity Monitoring System	<b>NSR</b> .....New Source Review
<b>CSR</b> ..... Code of State Regulations	<b>PM</b> ......particulate matter
<b>DDGS</b> ..... Dried Distillers Grains with Solubles	<b>PM<sub>2.5</sub></b> ......particulate matter less than 2.5 microns in aerodynamic diameter
<b>dscf</b> ..... dry standard cubic feet	<b>PM<sub>10</sub></b> .....particulate matter less than 10 microns in aerodynamic diameter
<b>dscm</b> .....dry standard cubic meter	<b>ppm</b> .....parts per million
<b>EIQ</b> ..... Emission Inventory Questionnaire	<b>PSD</b> .....Prevention of Significant Deterioration
<b>EP</b> .....Emission Point	<b>psi</b> .....pounds per square inch
<b>EPA</b> ..... Environmental Protection Agency	<b>PTE</b> .....potential to emit
<b>EU</b> ..... Emission Unit	<b>RACT</b> .....Reasonable Available Control Technology
<b>FGD</b> ..... flue gas desulfurization	<b>RAL</b> .....Risk Assessment Level
<b>FIRE</b> .....EPA's Factor Information Retrieval System	<b>RTO</b> .....Regenerative Thermal Oxidizer
<b>ft</b> ..... feet	<b>SCC</b> .....Source Classification Code
<b>GACT</b> ..... Generally Available Control Technology	<b>scfm</b> .....standard cubic feet per minute
<b>GHG</b> ..... Greenhouse Gas	<b>SCR</b> .....selective catalytic reduction
<b>gpm</b> ..... gallons per minute	<b>SIC</b> .....Standard Industrial Classification
<b>gr</b> ..... grains	<b>SIP</b> .....State Implementation Plan
<b>GWP</b> ..... Global Warming Potential	<b>SMAL</b> .....Screening Model Action Levels
<b>HAP</b> ..... Hazardous Air Pollutant	<b>SO<sub>x</sub></b> .....sulfur oxides
<b>hr</b> ..... hour	<b>SO<sub>2</sub></b> .....sulfur dioxide
<b>HP</b> ..... horsepower	<b>tph</b> .....tons per hour
<b>lb</b> ..... pound	<b>tpy</b> .....tons per year
<b>lb/hr</b> ..... pounds per hour	<b>VMT</b> .....vehicle miles traveled
<b>MACT</b> ..... Maximum Achievable Control Technology	<b>VOC</b> ..... Volatile Organic Compounds

**Attachment B1**  
Plantwide HAP Tracking Sheet

Date (month/year):

Material Used (Name, Type)	Amount Used This Month	Toluene (108-88-3) Emissions (tons)	Methanol (67-56-1) Emissions (tons)	Hexane (110-54-3) Emissions (tons)	Glycol Ethers (20-10-0) Emissions (tons)	Methylene Chloride (75-09-2) Emissions (tons)	Combined HAP Emissions (tons)
Aatrex	Mgal						
Solvent 142	Mgal						
Aromatic 100	Mgal						
Methanol	Mgal						
Toluene	Mgal						
Hexane	Mgal						
Exxsol D-95	Mgal						
Glycol Ether DB	Mgal						
Diethylene Glycol Monomethyl Ether	Mgal						
Isopar M	Mgal						
Diethylene Glycol	Mgal						
Methylene Chloride	Mgal						
SD Alcohol 3A	Mgal						
BMS PM-4083	Mgal						
BMS PM-4217	Mgal						
DEM Aerosol Alcohol Blend	Mgal						
Formula 3C Special	Mgal						
Formula C Anhydrous	Mgal						
Prestilone PM 4082	Mgal						
Natural Gas	MMscf						
<b>Monthly Emissions (tons):</b>							
Tank Breathing Losses (tpy):		0.05	1.51		0.0001		1.57
<b>12-Month Rolling Total Emissions (tpy):</b>							

Emissions (tons) = Amount Used This Month x Emission Factor x 0.0005. For emission factors, see Attachment B2.

Monthly Emissions (tons) = The sum of emissions from each material.

12-Month Rolling Total Emissions (tpy) = The sum of the most recent 12 months' Monthly Emissions (tons). **The permittee is in compliance with Permit Condition PW001 if 12-Month Rolling Total Emissions of each individual HAP are less than 10.0 tpy and if 12-Month Rolling Total Emissions of Combined HAP are less than 25.0 tpy.**

**Attachment B2**  
HAP Emission Factors

The permittee shall use these emission factors to determine emissions from these materials in Attachment B1.

**Composite Emission Factors (lb/Mgal) for Tank Working Losses and Truck/Rail/Barge/Container Loading**

Material	Toluene (108-88-3)	Methanol (67-56-1)	Hexane (110-54-3)	Glycol Ethers (20-10-0)	Methylene Chloride (75-09-2)	Combined HAP
Aatrex						0.0002
Solvent 142	0.0024					0.0024
Aromatic 100						0.0125
Methanol		2.6569				2.6569
Toluene	1.6586					1.6586
Hexane			8.7670			8.7670
Exxsol D-95	0.0024					0.0024
Glycol Ether DB				0.3403		0.3403
Diethylene Glycol Monomethyl Ether				0.3403		0.3403
Isopar M	0.0024					0.0024
Diethylene Glycol				0.3403		0.3403
Methylene Chloride					20.1043	20.1043
SD Alcohol 3A		0.1249				0.1249
BMS PM-4083		0.2111				0.2202
BMS PM-4217		0.2603				0.2694
DEM Aerosol Alcohol Blend		0.1587				0.1689
Formula 3C Special						0.0204
Formula C Anhydrous		0.0714				0.0806
Prestilone PM 4082		0.0682				0.0775

**Emission Factor (lb/MMscf)**

Material	Toluene (108-88-3)	Hexane (110-54-3)	Combined HAP
Natural Gas	0.0034	1.8	1.8885

The composite emission factors were calculated using Equation 1 of AP-42 Section 5.2 (July 2008) and the SDS for the material, as provided by the permittee. The natural gas emission factors were obtained from AP-42 Section 1.4 (July 1998).



## STATEMENT OF BASIS

### Permit Reference Documents

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

1. Part 70 Operating Permit Application, received August 1, 2011
2. 2013, 2012, 2011, 2010, and 2009 Emissions Inventory Questionnaires
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
4. WebFIRE: <http://cfpub.epa.gov/webfire/index.cfm?action=fire.SearchEmissionFactors>

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

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

10 CSR 10-5.220 *Control of Petroleum Liquid Storage, Loading, and Transfer* is not applicable to the installation and has not been applied within this permit as none of the installation's tanks contain petroleum liquid.

10 CSR 10-5.520 *Control of Volatile Organic Compound Emissions From Existing Major Sources* is not applicable to the installation and has not been applied within this permit as §5.520(1)(A) exempts installations subject to another regulation in 10 CSR 10-5. The installation is subject to and complying with 10 CSR 10-5.500.

10 CSR 10-5.540 *Control of Emissions From Batch Process Operations* is not applicable to the installation and has not been applied within this permit. The installation operates under SIC code 5169 which is not one of the SIC codes subject to this regulation per §5.540(1)(B).

10 CSR 10-5.570 *Control of Sulfur Emissions From Stationary Boilers* is not applicable to the installation and has not been applied within this permit. This regulation is only applicable to boilers with a nameplate capacity greater than 50 MMBtu/hr per §5.570(1)(A). B01 Boiler #1 is only 10.5 MMBtu/hr.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.260(1)(A)2 exempts combustion equipment that uses exclusively pipeline grade natural gas.

10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installations where all units are fueled only by natural gas.

### Construction Permits

City of St. Louis Construction Permits 95-07-083 and 99-08-063 were terminated on April 21, 2005 by the City of St. Louis.

City of St. Louis Construction Permit 97-08-082 limits EP-003 221,000 gallon Empty Tank to 1,440,000 gallons of aviation gasoline per consecutive 12-month period. This limitation was not included in the permit as EP-003 is not in use.

City of St. Louis Construction Permit 97-05-051 is applicable to the installation and has been applied within this permit (see Permit Condition 002).

**New Source Performance Standards Applicability**

40 CFR Part 60, Subparts D, Da, and Db – *Standards of Performance for Steam Generating Units* are not applicable to the installation. B01 Boiler #1 does not meet the applicability requirements of §60.40(a), §60.40a(a), and §60.40b(a) as its MHDR is only 10.5 MMBtu/hr.

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is applicable to B01 Boiler #1 and has been applied within this permit (see Permit Condition (003).

40 CFR Part 60, Subparts K, Ka, and Kb – *Standards of Performance for Volatile Organic Storage Vessels (Including Petroleum Liquid Storage Vessels)* are not applicable to the installation and have not been applied within this permit. NSPS K and Ka are not applicable to tanks less than 40,000 gallons. NSPS Kb is not applicable to tanks less than 75 m<sup>3</sup> (19,812 gallons).

Emission Unit	Description	NSPS Applicability		
		K	Ka	Kb
EP-001	310,000 gallon KOH Tank	Not applicable. KOH is not a VOL.		
EP-002	310,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.		
EP-003	221,000 gallon Empty Tank	Not applicable while empty.		
EP-004	420,000 gallon Empty Tank			
EP-005	380,000 gallon Herbicide (Lexar) Tank	Not applicable. Vapor pressure < 3.5 kPa.		
EP-006	380,000 gallon Herbicide (Halex) Tank			
EP-007	620,000 gallon Propylene Glycol Tank	This tank was installed prior to June 11, 1973 and has not been modified or reconstructed.		
EP-008	620,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.		
EP-009	210,000 gallon KOH Tank	Not applicable. KOH is not a VOL.		
EP-016	450,000 gallon Herbicide (Aatrex) Tank	Not applicable. Vapor pressure < 3.5 kPa.		
EP-022	50,000 gallon Solvent 142 Tank			
EP-023	50,000 gallon Furfural Alcohol Tank			
EP-026	50,000 gallon Aromatic 100 Tank			
EP-027	815,000 gallon Methanol Tank	This tank was installed prior to June 11, 1973 and has not been modified or reconstructed.		
EP-028	420,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.		
EP-029	630,000 gallon Empty Tank	Not applicable while empty.		
EP-030	450,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.		

The following tanks are below 40,000 gallons; therefore, they are not subject to NSPS K or Ka.

Emission Unit	Description	NSPS Kb Applicability
EP-010	20,000 gallon KOH Tank	Not applicable. KOH is not a VOL.
EP-031	30,000 gallon Methanol Tank	Not applicable. This tank was installed prior to July 23, 1984 and has not been modified or reconstructed.
EP-032	30,000 gallon Glycol Ether EB Tank	Not applicable. Vapor pressure < 15 kPa.
EP-033	30,000 gallon Toluene Tank	Not applicable. This tank was installed prior to July 23, 1984 and has not been modified or reconstructed.
EP-034	30,000 gallon Isopropanol Tank	Not applicable. Vapor pressure < 15 kPa.
EP-035	30,000 gallon Mineral Seal Oil Tank	Not applicable. Mineral Seal Oil is not a VOL.
EP-036	20,000 gallon Acetone Tank	Not applicable. Acetone is not a VOL.
EP-037	20,000 gallon EG Monoethyl Ether Acetate Tank	Not applicable. Vapor pressure < 15 kPa.
EP-038	20,000 gallon Empty Tank	Not applicable while empty.
EP-039	20,000 gallon Aromatic 100 Tank	Not applicable. Vapor pressure < 15 kPa.
EP-040	20,000 gallon Empty Tank	Not applicable while empty.
EP-041	20,000 gallon Ethyl Acetate Tank	Not applicable. This tank was installed prior to July 23, 1984 and has not been modified or reconstructed.
EP-042	20,000 gallon Empty Tank	Not applicable while empty.
EP-043	20,000 gallon Empty Tank	
EP-044	20,000 gallon Hexane Tank	Not applicable. Vapor pressure < 15 kPa.
EP-045	20,000 gallon Exxsol D-95 Tank	
EP-046	20,000 gallon Ethanol SDA 3C Tank	Not applicable. This tank was installed prior to July 23, 1984 and has not been modified or reconstructed.
EP-047	20,000 gallon Glycol Ether DB Tank	Not applicable. Vapor pressure < 15 kPa.
EP-048	20,000 gallon Heptane C Tank	Not applicable. This tank was installed prior to July 23, 1984 and has not been modified or reconstructed.
EP-049	20,000 gallon Acetone Tank	Not applicable. Acetone is not a VOL.
EP-050	20,000 gallon Exxsol D-95 Tank	Not applicable. Vapor pressure < 15 kPa.
EP-051	20,000 gallon Ethanol SDA 40B Tank	
EP-052	20,000 gallon Diethylene Glycol Monomethyl Ether Tank	
EP-053	20,000 gallon Isopar M Tank	
EP-054	20,000 gallon Isopar M Tank	
EP-056	20,000 gallon Diethylene Glycol Tank	
EP-057	20,000 gallon Diethylene Glycol Tank	

### MACT Applicability

40 CFR Part 63, Subpart Y – *National Emission Standards for Marine Tank Vessel Loading Operations* is not applicable to the installation and has not been applied within this permit as §63.560(a) exempts existing minor HAP sources. If the installation becomes a major HAP source or adds/modifies the

pumps associated with B02 Barge Loading (one 360 gpm methanol pump and one 240 gpm propylene glycol pump), then the installation will become subject to the requirements of this regulation.

40 CFR Part 63, Subpart EEEE – *National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)* is not applicable to the installation and has not been applied within this permit as §63.2334(a) states that this regulation only applies to major HAP sources.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to the installation and has not been applied within this permit as §63.7485 states that this regulation only applies to major HAP sources.

40 CFR Part 63, Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable to the installation and has not been applied within this permit as §63.11195(e) exempts gas-fired boilers.

40 CFR Part 63, Subpart BBBB – *National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry* is not applicable to the installation and has not been applied within this permit. Although the installation does operate a chemical preparations facility, the chemical preparations facility does not use compounds of Chromium (VI), Lead, Nickel, Manganese, or Chromium (III); therefore, the installation does not meet the applicability requirements of §63.11579(a)(3).

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

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

#### **Compliance Assurance Monitoring (CAM) Applicability**

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

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

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

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

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons per year) <sup>1</sup>
CO	3.76
NO <sub>x</sub>	4.47
PM <sub>10</sub>	0.34
PM <sub>25</sub>	0.34
SO <sub>x</sub>	0.03
VOC	Major
HAP	<25.0
Toluene (108-88-3)	<10.0
Methanol (67-56-1)	<10.0
Hexane (110-54-3)	<10.0
Glycol Ethers (20-10-0)	<10.0
Methylene Chloride (75-09-2)	<10.0
MIBK (108-10-1)	2.41
Xylene (1330-20-7)	0.57
Cumene (98-82-8)	0.43
Ethylene Glycol (107-21-1)	0.02

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation .

**Other Regulatory Determinations**

10 CSR 10-5.500 *Control of Emissions From Volatile Organic Liquid Storage* is applicable to the installation and has been applied within this permit (see Permit Condition 001). This regulation only applies to tank with a capacity greater than 40,000 gallons per 10 CSR 10-5.500(1)(B):

Emission Unit	Description	10 CSR 10-5.500 Applicability
EP-001	310,000 gallon KOH Tank	Not applicable. KOH is not a VOL.
EP-002	310,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.
EP-003	221,000 gallon Empty Tank	Not applicable while empty.
EP-004	420,000 gallon Empty Tank	Not applicable while empty.
EP-005	380,000 gallon Herbicide (Lexar) Tank	Not applicable. Vapor pressure < 0.5 psia.
EP-006	380,000 gallon Herbicide (Halex) Tank	Not applicable. Vapor pressure < 0.5 psia.
EP-007	620,000 gallon Propylene Glycol Tank	Not applicable. Vapor pressure < 0.5 psia.
EP-008	620,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.
EP-009	210,000 gallon KOH Tank	Not applicable. KOH is not a VOL.
EP-016	450,000 gallon Herbicide (Aatrex) Tank	Not applicable. Vapor pressure < 0.5 psia.
EP-022	50,000 gallon Solvent 142 Tank	Not applicable. Vapor pressure < 0.5 psia.
EP-023	50,000 gallon Furfural Alcohol Tank	Not applicable. Vapor pressure < 0.5 psia.
EP-026	50,000 gallon Aromatic 100 Tank	Not applicable. Vapor pressure < 0.5 psia.
EP-027	815,000 gallon Methanol Tank	Applicable. See Permit Condition 001.
EP-028	420,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.
EP-029	630,000 gallon Empty Tank	Not applicable while empty.
EP-030	450,000 gallon NaOH Tank	Not applicable. NaOH is not a VOL.

10 CSR 10-6.170 *Restriction of PM to Ambient Air Beyond the Premises of Origin* is applicable to the installation, but has not been applied within this permit. The installation has potential PM emissions of only 0.34 tons per year; therefore, no monitoring, recordkeeping, or reporting has been included in the permit.

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. The installation has potential PM emissions of only 0.34 tons per year; therefore, no monitoring, recordkeeping, or reporting has been included in the permit.

### **Response to Public Comments**

The draft Part 70 Operating Permit, Project 2011-07-067, for Brenntag Mid-South, Inc. (510-1093) was placed on public notice as of October 17, 2014, 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://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on Friday, October 17, 2014. The Missouri Air Pollution Control Program did not receive any comments on this permit during its public notice period.

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

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

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

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