

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

FEB 19 2019

Mr. Tom DeRosa
Bull Moose Tube Company
P.O. Box 214
Gerald, MO 63037

Re: Bull Moose Tube Company, 071-0087
Permit Number: OP2019-006

Dear Mr. DeRosa:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kwj

Enclosures

c: PAMS File: 2018-10-005



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PERMIT TO OPERATE INTERMEDIATE STATE

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.

Intermediate Operating Permit Number: OP2019-006
Expiration Date: FEB 19 2024
Installation ID: 071-0087
Project Number: 2018-10-005

Installation Name and Address

Bull Moose Tube Company
406 East Industrial Drive
Gerald, MO 63037
Franklin County

Parent Company's Name and Address

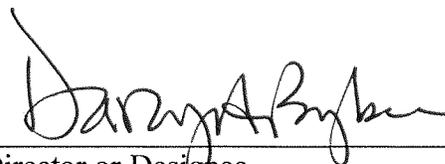
Bull Moose Tube Company
1819 Clarkson Road, STE 100
Chesterfield, MO 63017

Installation Description:

Bull Moose Tube Company produces fusion welded steel tubing from purchased material. The installation is a synthetic minor source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

FEB 19 2019

Effective Date



Director or Designee
Department of Natural Resources

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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>
EP2	Tube Coating Process: Automatic spray unit equipped with six spray guns, a diaphragm pump, and paint reservoir, constructed 2001; controlled by a fabric filter, 9.55 gal/hr
EP6	Rust Preventative Application, flow coat, 4.14 gal/hr
EP4	Cold Cleaning in Parts Washers

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Description of Emission Source

Cold Cleaning of Slit Coils (EP1)
Haul Roads (EP5)
Space Heating, 5.64 MMBtu/hr propane total (EP7)
Woodcutting Operations, 230.4 lb/hr:
 Two Table Saws (Whirlwind)
 One Radial Arm Saw (DeWalt)
 One Dado Saw for making grooves

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.

PERMIT CONDITION PW001

10 CSR 10-6.065 Operating Permits (Voluntary Limitations)

Emission Limitations:

- 1) The permittee shall emit less than 100.0 tons of VOC from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain accurate records of monthly and 12-month rolling total VOC emissions using Attachment E or an equivalent form for the entire installation.
- 2) The permittee shall retain copies of all SDS from all materials used.
- 3) The permittee shall maintain all records for no less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

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

PERMIT CONDITION PW002

10 CSR 10-6.065 Operating Permits (Voluntary Limitations)

Emission Limitations:

- 1) The permittee shall emit less than 10.0 tons of any individual HAP and less than 25.0 tons of any combination of HAPs from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain accurate records of monthly and 12-month rolling total combined and individual HAP emissions using Attachments F and G or equivalent forms.
- 2) The permittee shall retain copies of all SDS from all materials used.
- 3) The permittee shall maintain all records for no less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

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

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001		
10 CSR 10-6.060 Construction Permits Required Construction Permit 112001-027, Issued November 29, 2001		
Emission Source	Description	Manufacturer/Model #
EP2	Tube Coating Process: Automatic spray unit equipped with six spray guns, a diaphragm pump, and paint reservoir, constructed 2001; controlled by a fabric filter, 9.55 gal/hr	Dubois/UVSP-6

Emission Limitation:

- 1) The permittee shall not discharge into the atmosphere from the tube coating process (EP2) VOC in excess of 40.0 tons in any consecutive 12-month period. [Special Condition 1.A.]

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of monthly and rolling 12-month total VOC emissions from the tube coating process (EP2) using Attachment H or an equivalent. [Special Condition 1.B. and 1.C.]
- 2) The permittee shall retain copies of all SDS from all materials used.
- 3) The permittee shall maintain all records for no less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 1.C.]

Reporting:

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

PERMIT CONDITION 002		
10 CSR 10-6.060 Construction Permits Required Construction Permit 112001-027, Issued November 29, 2001		
Emission Source	Description	Manufacturer/Model #
EP2	Tube Coating Process: Automatic spray unit equipped with six spray guns, a diaphragm pump, and paint reservoir, constructed 2001; controlled by a fabric filter, 9.55 gal/hr	Dubois/UVSP-6

Operational Limitation:

- 1) The permittee shall control particulate emissions from the tube coating process (EP2) using fabric filters during operation. [Special Condition 2]
- 2) The permittee shall maintain and operate the filters in accordance with the manufacturer's specifications. [Special Condition 2]

3) The permittee shall keep replacement filters on hand at all times. [Special Condition 2]

Monitoring/Recordkeeping:

- 1) The permittee shall inspect the filter daily before operation of EP2. If perforations are found, a new filter shall be inspected and installed. The filter shall be installed properly such that no gaps or holes are visible on the exhaust.
- 2) The permittee shall maintain an operating and maintenance log using Attachment D, or an equivalent, for the filter that shall include the following:
 - a) Incidents of malfunction, with impacts on emissions, durations of events, probable causes and corrective actions.
 - b) Maintenance activities, with inspection schedule, repair actions and replacements.
- 3) The permittee shall keep a copy of the manufacturer's performance warranty for the filters onsite.
- 4) The permittee shall keep records for a minimum of five years and shall make all records available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

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

PERMIT CONDITION 003		
10 CSR 10-6.220, Restriction of Visible Air Contaminants		
Emission Source	Description	Manufacturer/Model #
EP2	Tube Coating Process: Automatic spray unit equipped with six spray guns, a diaphragm pump, and paint reservoir, constructed 2001; controlled by a fabric filter, 9.55 gal/hr	Dubois/UVSP-6

Emission Limitation:

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

Monitoring:

- 1) Monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
 - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
 - (1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.

- 2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
- 3) Observations are only required when the emission units are operating and when the weather conditions allow.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
- 5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
- 6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results for each emission unit using Attachments A and B or equivalent forms.
- 2) All records must be kept for a minimum of 5 years and be made available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
- 2) Reports of any deviations from the requirements of this permit condition shall be submitted in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004		
10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations		
Emission Source	Description	Manufacturer/Model #
EP2	Tube Coating Process: Automatic spray unit equipped with six spray guns, a diaphragm pump, and paint reservoir, constructed 2001; controlled by a fabric filter, 9.55 gal/hr	Dubois/UVSP-6
EP6	Rust preventative application, Flow coat, 4.14 gal/hr	Unknown

Emission Limitation

- 1) The permittee shall not cause, allow, or permit the discharge into the ambient air of any VOCs in excess of the following, as delivered to the coating applicator(s): [10 CSR 10-5.330(3)(J)2.]

Metal Parts and Products Coatings		
Coating Category	Emission Limit in pounds of VOC per gallon of coating (minus water and exempt compounds)	
	Air Dried Coating	Baked Coating
One Component Coating	2.8	2.3
Multi Component Coating	2.8	2.3
Camouflage Coating	3.5	3.5
Clear Coat	4.3	4.3
Electric-Insulating Varnish	3.5	3.5
Etching Filler	3.5	3.5
Extreme High Gloss Coating	3.5	3.0
Extreme Performance Coating	3.5	3.0
Heat Resistant Coating	3.5	3.0
High Performance Architectural Coating	6.2	6.2
High Temperature Coating	3.5	3.5
Metallic Coating	3.5	3.5
Military Specification Coating	2.8	2.3
Mold Seal Coating	3.5	3.5
Pan Backing Coating	3.5	3.5
Prefabricated Architectural Component Coating	3.5	2.3
Pretreatment Coatings	3.5	3.5
Repair and Touch Up Coatings	3.5	3.0
Silicone Release Coating	3.5	3.5
Solar-Coating Absorbent	3.5	3.0
Vacuum Metalizing Coating	3.5	3.5
Drum, New, Exterior	2.8	2.8
Drum, New, Interior	3.5	3.5
Drum, Reconditioned, Exterior	3.5	3.5
Drum, Reconditioned, Interior	4.2	4.2

Note: At the time of permit issuance the permittee used a Valspar WLA2079 coating which would fall under one component coating category and a Valspar WLC0129 coating which is a clear coat. Only one of these two coatings is applied at a time. Both are air dried. The rust preventative coating is a clear coat which is air dried.

Operational Limitations:

- 1) The permittee shall use one or a combination of the following equipment for coating application:
 - [10 CSR 10-5.330(3)(J)4.]
 - a) Electrostatic spray application [10 CSR 10-5.330(3)(J)4.A.]
 - b) HVLP spray equipment [10 CSR 10-5.330(3)(J)4.B.]
 - c) Flow coating [10 CSR 10-5.330(3)(J)4.C.]
 - d) Roller coating [10 CSR 10-5.330(3)(J)4.D.]
 - e) Dip coating, including electrode-position [10 CSR 10-5.330(3)(J)4.E.]
 - f) Airless spray [10 CSR 10-5.330(3)(J)4.F.]
 - g) Air-assisted airless spray [10 CSR 10-5.330(3)(J)4.G.]
 - h) Ink jet technology [10 CSR 10-5.330(3)(J)4.H.]
 - i) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying. [10 CSR 10-5.330(3)(J)4.I.]

Work Practice Standards:

- 1) The permittee shall use work practices to minimize VOC emissions from solvent storage, mixing operations, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices include, but are not be limited to, the following: [10 CSR 10-5.330(3)(J)5.]
 - a) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers [10 CSR 10-5.330(3)(J)5.A.]
 - b) 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 [10 CSR 10-5.330(3)(J)5.B.]
 - c) Minimize spills of VOC-containing coatings, thinners, and cleaning materials [10 CSR 10-5.330(3)(J)5.C.]
 - d) Clean up spills immediately [10 CSR 10-5.330(3)(J)5.D.]
 - e) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one location to another [10 CSR 10-5.330(3)(J)5.E.]
 - f) 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 [10 CSR 10-5.330(3)(J)5.F.]

Monitoring:

- 1) The permittee shall demonstrate compliance with the emission limitation by using compliant materials. The permittee shall maintain a SDS or product specification sheet for each material indicating the VOC content of the material, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). If the SDS or product specification sheet does not list the VOC content in pounds of VOC per gallon of coating (minus water and exempt compounds), the permittee shall use the equation at 10 CSR 10-5.330(5)(C)1.A to determine the VOC content in pounds of VOC per gallon of coating (minus water and exempt compounds).

Recordkeeping:

- 1) The permittee shall keep the following records: [10 CSR 10-5.330(4)(A)]
 - a) Current list of coatings used and the VOC content as applied. [10 CSR 10-5.330(4)(A)1.]
 - b) Annual VOC emissions from surface coating equipment cleaning. [10 CSR 10-5.330(4)(A)4.]
- 2) Records such as daily production rates may be substituted for actual daily coating use measurements provided the permittee submits a demonstration, approved by the director, that these records are adequate for the purposes of 10 CSR 10-5.330. [10 CSR 10-5.330(4)(B)]
- 3) All records shall be maintained for a minimum of five years and shall be made available to Missouri Department of Natural Resources' personnel upon request.

Reporting:

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

PERMIT CONDITION 005

10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning

Emission Source	Description	Manufacturer/Model #
EP4	Cold Cleaning in Parts Washers	Dubois/UVSP-6

Emission Limitations:

- 1) The permittee shall not operate a cold cleaner using a solvent with a vapor pressure greater than 1.0 mmHg at 20°C. [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 listed above. The director must approve the alternative method. [10 CSR 10-5.300(3)(A)1.D.]

Operational Limitation/Equipment Specifications:

- 1) Each cold cleaner shall have a cover which prevents the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits 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.]
- 2) When one or more of the following conditions exist, the design of the cover shall be such that it can be easily operated with one hand such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems): [10 CSR 10-5.300(3)(A)1.E.]
 - a) The solvent vapor pressure is greater than 0.3 psi measure at 37.8°C (100°F), such as in mineral spirits. [10 CSR 10-5.300(3)(A)1.E.(I)]
 - b) The solvent is agitated; or [10 CSR 10-5.300(3)(A)1.E.(II)]
 - c) The solvent is heated. [10 CSR 10-5.300(3)(A)1.E.(III)]
- 3) Each cold cleaner shall have a drainage facility which will be internal so that parts are enclosed under the cover while draining. [10 CSR 10-5.300(3)(A)1.F.]
- 4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (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.]
- 5) Solvent sprays, if used, 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.]
- 6) 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.]
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices: [10 CSR 10-5.300(3)(A)1.J.]
 - a) A freeboard ratio of at least 0.75; [10 CSR 10-5.300(3)(A)1.J.(I)]
 - b) Water cover (solvent must be insoluble in and heavier than water); or [10 CSR 10-5.300(3)(A)1.J.(II)]
 - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems must receive approval from the director prior to their use. [10 CSR 10-5.300(3)(A)1.J.(III)]

- 8) Each cold cleaner shall be operated as follows: [10 CSR 10-5.300(3)(B)1.]
 - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the 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) Clean parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [10 CSR 10-5.300(3)(B)1.B.]
 - c) Whenever a cold cleaner fails to perform within the operating parameters established by this regulation, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established operating procedures. [10 CSR 10-5.300(3)(B)1.C.]
 - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down and leaks secured until the leaks are repaired. [10 CSR 10-5.300(3)(B)1.D.]
 - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods in accordance with the Missouri Hazardous Waste Management Commission Rules codified as 10 CSR 25, as applicable: [10 CSR 10-5.300(3)(B)1.E.]
 - i) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste, or [10 CSR 10-5.300(3)(B)1.B.(I)]
 - ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the director. [10 CSR 10-5.300(3)(B)1.B.(II)]
 - iii) Waste solvent shall be stored in covered containers only. [10 CSR 10-5.300(3)(B)1.B.(III)]
- 9) Operators must be trained as follows: [10 CSR 10-5.300(3)(C)]
 - a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate this equipment; [10 CSR 10-5.300(3)(C)1.]
 - b) The supervisor of any person who operates a solvent metal cleaning process shall receive equivalent or greater operational training than the operators; and [10 CSR 10-5.300(3)(C)2.]
 - c) Refresher training shall be given to all solvent metal cleaning equipment operators at least once every 12 month period. [10 CSR 10-5.300(3)(C)3.]

Monitoring:

- 1) The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.

Recordkeeping:

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent using Attachment J or an equivalent form approved by the Air Pollution Control Program: [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 monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises using Attachment I or an equivalent form approved by the Air

Pollution Control Program. The record also shall include maintenance and repair logs that occurred on the cold cleaner using Attachment D or an equivalent form approved by the Air Pollution Control Program. [10 CSR 10-5.300(4)(A)]

- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis using Attachment K or an equivalent form approved by the Air Pollution Control Program. [10 CSR 10-5.300(4)(D)]
- 4) All records shall be maintained for five years and shall be made available to Department of Natural Resources' personnel upon request. [10 CSR 10-5.300(4)(E)]

Reporting:

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

IV. Core Permit Requirements

The installation shall comply with each of the following requirements: 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 10-6.110 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 submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment C, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether equipment malfunctions contributed to an exceedance.
- 3) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C 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. 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, §(5)(C)1 and §(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.
- b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than 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.
- 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(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.I Reasonably Anticipated Operating Scenarios

For alternative materials, the permittee shall calculate PTE at MHDR (9.55 gal/hr for EP2 and 4.14 gal/hr for EP6) for the new material and compare it to the insignificant emission exemption levels from construction permitting in Table 1 of 10 CSR 10-6.061 and the SMALs at: <https://dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>. If the PTE of the alternative materials exceeds the insignificant emission exemption levels or the SMALs, the permittee shall obtain a construction permit

prior to using the alternative material. These new materials should be included in any emission tracking requirements of this operating permit.

The permittee shall apply for an operating permit amendment if the alternative material would make the installation subject to MACTs T (i.e. a cleaning solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform) or HHHHHH (i.e. a cleaning solvent containing methylene chloride or a surface coating material containing chromium, lead manganese, nickel, or cadmium).

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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. 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, §(5)(C)1 and §(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(5)(C)5 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. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This 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; and
 - 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.

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

The application utilized in the preparation of this permit was signed by Tom DeRosa, Vice President of Operations. 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, §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) or the Environmental Protection Agency (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,
- 2) 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,
- 3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(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

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

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

Attachment B

Method 9 Opacity Observations									
Installation Name:						Sketch of the observer's position relative to the emission unit			
Emission Point:									
Emission Unit:									
Observer Name and Affiliation:									
Observer Certification Date:									
Method 9 Observation Date:									
Height of Emission Point:									
Time:						Start of observations	End of observations		
Distance of Observer from Emission Point:									
Observer Direction from Emission Point:									
Approximate Wind Direction:									
Estimated Wind Speed:									
Ambient Temperature:									
Description of Sky Conditions (Presence and color of clouds):									
Plume Color:									
Approximate Distance Plume is Visible from Emission Point:									
Minute	Seconds				1-minute Avg. % Opacity ¹	6-minute Avg. % Opacity ²	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
Opacity Readings (% Opacity) ³									
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
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10									
11									
12									

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

13									
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The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%.
Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 60%.

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

Signature of Observer

Attachment L
Abbreviations and Acronyms

°Cdegrees Celsius	m/s meters per second
°Fdegrees Fahrenheit	mgmilligrams
AAQIAambient air quality impact analysis	Mgal 1,000 gallons
acfmactual cubic feet per minute	MW megawatt
BACTBest Available Control Technology	MHDR maximum hourly design rate
BMPsBest Management Practices	MMBtu Million British thermal units
BtuBritish thermal unit	mmHgmillimeters mercury
CAMCompliance Assurance Monitoring	MMscf Million standard cubic feet
CASChemical Abstracts Service	MSDS Material Safety Data Sheet
CEMS Continuous Emission Monitor System	NAAQS National Ambient Air Quality Standards
CFRCode of Federal Regulations	NESHAPs . National Emissions Standards for Hazardous Air Pollutants
COcarbon monoxide	NO_x nitrogen oxides
CO₂carbon dioxide	NSPS New Source Performance Standards
CO₂ecarbon dioxide equivalent	NSR New Source Review
COMS Continuous Opacity Monitoring System	PM particulate matter
CSRCode of State Regulations	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
dscfdry standard cubic feet	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
dscmdry standard cubic meter	ppm parts per million
EIQEmission Inventory Questionnaire	PSD Prevention of Significant Deterioration
EPEmission Point	psipounds per square inch
EPAEnvironmental Protection Agency	PTE potential to emit
EUEmission Unit	RACT Reasonable Available Control Technology
FGD flue gas desulfurization	RAL Risk Assessment Level
FIREEPA's Factor Information Retrieval System	SCC Source Classification Code
fpsfeet per second	scfm standard cubic feet per minute
ftfeet	SCR selective catalytic reduction
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
grgrains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAPHazardous Air Pollutant	tph tons per hour
hrhour	tpy tons per year
HPhorsepower	VMT vehicle miles traveled
lbpound	VOC Volatile Organic Compound
lb/hrpounds per hour	
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Installation Description

Bull Moose Tube Company produces fusion welded steel tubing from purchased material. The installation has accepted voluntary limitations on VOC and HAP to obtain this Intermediate Operating Permit. The installation is not on the List of Named Installations found at 10 CSR 10-6.020(3)(B) Table 2; therefore, fugitive emissions are not counted toward major source applicability.

The installation has the potential to emit VOC above the major source level of 100.0 tpy, but has accepted a voluntary limit in order to obtain this Intermediate Operating Permit. The installation does not have the potential to emit HAP above the major source levels at this time; however, the installation has the operational flexibility to increase HAP emissions through the use of alternative materials (see Section V. General Permit Requirements, 10 CSR 10-6.065(5)(C)1.I Reasonably Anticipated Operating Scenarios) provided the requirements of Permit Condition PW001 are met.

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

Pollutants	PTE ¹⁴	Reported Emissions		
		2017	2016 -2014	2013
Particulate Matter ≤ Ten Microns (PM ₁₀)	1.39	0.86	0.79	0.64
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.19	0.08	0.10	0.08
Sulfur Oxides (SO _x)	0.03	--	< 0.01	< 0.01
Nitrogen Oxides (NO _x)	3.53	--	0.48	0.48
Volatile Organic Compounds (VOC)	< 100	26.32	24.48	26.05
Carbon Monoxide (CO)	2.04	--	0.27	0.27

¹⁴ The potential to emit is based upon 8,760 hours of uncontrolled annual emissions unless otherwise noted. EP2 is required to operate a fabric filter by Permit Condition 001 and was given 98.8 percent PM control efficiency for its use. EP2 is limited to 40 tpy VOC by Permit Condition 001.

Pollutants	PTE ¹⁴	Reported Emissions		
		2017	2016 -2014	2013
Hazardous Air Pollutants (HAPs)	< 10/25	--	--	--

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) Intermediate Operating Permit Application, received October 1, 2018;
- 2) 2013-2017 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;
- 5) All construction permits listed in Construction Permit History.

Construction Permit History

Construction Permit 012000-014, Issued November 29, 2001

Bull Moose Tube Company proposed to construct a new Dubois model coating machine to replace the existing tube-coating machine at this facility. The new machine is an automatic spray paint unit consisting of six spray guns, a diaphragm pump, paint reservoir and air pollution filter housing. This new line will replace the Ultra-Violet Curing System and will be located in Mill 5. The end product of this coating line is used in overhead sprinkler systems. All special conditions are included in the operating permit.

Missouri Code of State Regulations (CSR) Applicability

10 CSR 10-5.300, *Control of Emissions From Solvent Metal Cleaning*

This rule is applicable due to being located in one of the affected counties. The cold cleaning accounted for under EP01 is exempt from this rule per 5.300(1)(D)1.E. as it is a wiping operation.

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*

This rule is applicable due to the facility being located in one of the affected counties. It has been applied within the operating permit. The usage and VOC content requirements of this rule have been excluded from the operating permit in order to streamline it; the permittee is already required to track usage and VOC content in Permit Condition PW001. As of the renewal of this permit (January 2019), this rule is being updated in the CFR. The only changes that affect this installation involve clarifying language and the shifting of rule references. Permit Condition 004 reflects the updated language in the rule update.

10 CSR 10-5.455, *Control of Emissions from Solvent Cleanup Operations*

This rule does not apply because the solvent cleaning operations at the facility are cold cleaners. [10 CSR 10-5.455(1)(C)1] Additionally, this rule is being rescinded January 30, 2019.

10 CSR 10-6.100, *Alternate Emission Limits*

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

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule applies and has been incorporated into the operating permit. This rule applies to EP2. The haul roads (EP5) and one of the table saws are exempt due to being a fugitive source which is exempt per (1)(K). The space heaters (EP7) are exempt due to being fueled only by propane per (1)(L). EP1, EP4, and EP6 are either not a source of PM and/or not spray applied, meaning any PM is not aerosolized into the air; as a result, visible emissions are not expected. The woodcutting operations do not vent directly to the outside and are thus exempt per (1)(O).

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

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

These rules do not apply to the space heaters because they are fueled by propane and are thus exempt per 6.260(1)(A)2 and 6.261(1)(A).

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

This rule does not apply to the tube coating process (EP2) because it is equipped with a control system (made practically enforceable in Permit Condition 002) designed to control 98.8 percent of particulate overspray, which meets the exemption in (1)(B)14.

Woodcutting Operations:

One table saw, one radial arm saw and one Dado saw are located in the wood shop area. Emissions from cutting wood at the table and radial arm saws in the wood shop area are exhausted through a cyclone (located outside the building) and then through a polyester felt bag filter (located inside the building). Emissions from the Dado saw are not connected to any control device.

One table saw is located in the shipping area. The purpose of cutting wood at the plant is to provide skids for the finished tube bundles which are then banded, and for making truck blocks. The skids are required by only some customers.

The maximum hourly design rate for all wood cutting is 230.4 lb/hr or 0.115 tons/hr. Using an emission factor for total particulates of 0.35 lb/ton of wood (FIRE SCC 30700802):

Maximum uncontrolled particulate emission rate at design capacity = 0.115 ton/hr x 0.35 lb/ton = 0.04 lb/hr. This is less than 0.5 lb/hr, therefore the rule does not apply per exemption (1)(B)12.

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

This rule does not apply. The space heaters are fueled solely by propane which is exempt from this rule per (1)(E).

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart TT – *Standards of Performance for Metal Coil Surface Coating*

This subpart applies to metal coil surface coating operations which is defined as using the application system to apply an organic coating to the surface of any continuous metal strip with a thickness of 0.15 mm or more that is packaged in a roll or coil. The permittee purchases steel coils and then they are slit to desired widths and passed through a series of rollers on the tube mill to form tubes/pipes. The tubes/pipes seam is fusion welded. The permittee uses the paint booth on the metal after the coils have been converted to steel pipes/tubes and are no longer metal coils themselves.

Because they are no longer metal coils when they are coated, the permittee does not meet the definition of metal coil surface coating operations; as a result, this subpart does not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning*

This regulation does not apply to the parts washer because it does not use any materials which contain methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3). If the installation begins using an alternative material containing one of these chemicals that would be subject to this regulation, the permittee shall submit an application to include this regulation in this operating permit prior to using the alternative material.

40 CFR Part 63, Subpart MMMM — *National Emission Standards for HAPs for Surface Coating of Miscellaneous Metal Parts and Products*

This regulation applies to surface coating of metal parts and products at major sources of HAPs. The installation is not a major source of HAPs, therefore this rule does not apply.

40 CFR Part 63, Subpart SSSS - *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil*

This subpart applies to major sources of HAPs at which a coil coating line is operated. The installation is not a major source of HAPs; thus, this subpart does not apply.

40 CFR Part 63, Subpart HHHHHH — *National Emission Standards for HAPs: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

This regulation applies to area sources involved in any of the following activities:

- Paint stripping operations that involve the use of chemical strippers that contain methylene chloride, Chemical Abstract Service number 75092, in paint removal processes;
- Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;
- Spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium, collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

This installation does not perform these activities at this time; therefore this regulation does not apply. If the installation begins using an alternative material containing methylene chloride, chromium, lead, manganese, nickel, or cadmium that would be subject to this regulation, the permittee shall submit an application to include this regulation in this operating permit prior to using the alternative material.

40 CFR Part 63, Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

This subpart does not apply. The permittee purchases steel coils which are slit to desired widths and passed through a series of rollers on the tube mill to form the tubes/pipes. The tubes/pipes seam is fusion welded. The coatings are applied using the paint booth after the coils are converted to steel pipes/tubes. Based on the NAICS code of 331210 (Iron and Steel Pipe and Tube Manufacturing

from Purchased Steel) the permittee does not fall under one of the industry types that are affected due to this rule as explained below:

- *Electrical and Electronic Equipment Finishing Operations*; the permittee does not engage in manufacturing motors, generators, electrical machinery, equipment, etc. in this category.
- *Fabricated Metal Products*; the permittee does not engage in manufacturing fabricated metal products (such as fire/burglary resistive steel safes, vaults, collapsible tubes in thin flexible metal, powder metallurgy products, metal boxes, metal ladders or metal household articles), etc. in this category.
- *Fabricated Plate Work (Boiler Shops)*; the permittee does not engage in manufacturing power marine boilers, pressure and non-pressure tanks, processing and storage vessels, heat exchangers, weldments and similar products.
- *Fabricated Structural Metal Manufacturing*; the permittee does not engage in fabricating iron and steel or other metal for structural purposes, such as bridges, buildings, and sections for ships, boats, and barges.
- *Heating Equipment, except Electric*; the permittee does not engage in manufacturing heating equipment, except electric and warm air furnaces, including gas, oil, and stoker coal fired equipment for the automatic utilization of gaseous, liquid, and solid fuels, etc. in this category.
- *Industrial Machinery and Equipment Finishing Operations*; the permittee does not engage in construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing, etc. in this category.
- *Iron and Steel Forging*; the permittee does not engage in forging manufacturing process, where purchased iron and steel metal is pressed, pounded or squeezed under great pressure into high strength parts known as forgings.
- *Primary Metal Products Manufacturing*; the permittee does not engage in manufacturing products such as fabricated wire products (except springs) made from purchased wire.
- *Valves and Pipe Fittings*; the permittee does not engage in manufacturing metal valves and pipe fittings; flanges; unions, with the exception of purchased pipes; and other valves and pipe fittings not elsewhere classified.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Greenhouse Gas Emissions

Note that this source may be subject to the Greenhouse Gas Reporting Rule. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

None.

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 permit was put up on public notice on January 11, 2019 for a period of 30 days. During this time a comment was received from Robert Cheever from EPA Region 7. The comment is addressed below.

Comment #1:

40 CFR Part 63 Subpart XXXXXX-*National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* appears that it might be applicable to the Bull Moose Tube Company facility in Gerald. However, the Statement of Basis does not address the applicability of 40 CFR Part 63, Subpart XXXXXX.

I might suggest that MoDNR consider whether or not the applicability of this MACT standard should be addressed in this operating permit.

Response to Comment #1:

Discussion for 40 CFR Part 63 Subpart XXXXXX applicability has been added to the Statement of Basis.