



## 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:** OP2010-048  
**Expiration Date:** JUN 04 2015  
**Installation ID:** 071-0014  
**Project Number:** 2008-06-018

**Installation Name and Address**

Canam Steel Corporation  
2000 West Main Street  
Washington, MO 63090  
Franklin County

**Parent Company's Name and Address**

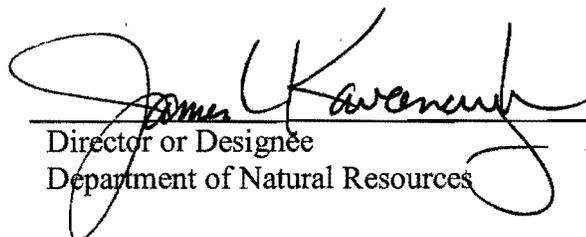
Canam Group, Inc.  
270 Chemin du Tremblay  
Boucherville, Quebec J4B 5X9  
Canada

**Installation Description:**

Canam Steel Corporation fabricates steel joists and joist girders at the installation in Franklin County. This installation is an existing major source of Volatile Organic Compounds (VOCs) in the St. Louis non-attainment area for ozone.

JUN 10 2010

Effective Date

  
Director or Designée  
Department of Natural Resources

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>4</b>
INSTALLATION DESCRIPTION .....	4
EMISSION UNITS WITH LIMITATIONS .....	4
EMISSION UNITS WITHOUT LIMITATIONS .....	4
DOCUMENTS INCORPORATED BY REFERENCE .....	5
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>6</b>
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>7</b>
EU0010 THROUGH EU0030 – PAINTING OPERATIONS.....	7
Permit Condition EU0010-001 through EU0030-001 .....	7
10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations.....	7
Permit Condition EU0010-002 .....	9
10 CSR 10-6.060 Construction Permits Required.....	9
Construction Permit No. 0699-012, Issued May 25, 1999 .....	9
Permit Condition EU0020-002 .....	10
10 CSR 10-6.060 Construction Permits Required.....	10
Construction Permit No. 12001-019, Issued Dec 10, 2001 .....	10
Correction to Permit No 102001-019; 102001-019A issued December 10, 2002.....	10
Permit Condition EU0030-002 .....	10
10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning .....	10
10 CSR 10-5.300(3)(B)4. Spray Gun Cleaners .....	10
EU0040 – COLD SOLVENT CLEANING .....	12
Permit Condition EU0040-001 .....	12
10 CSR 10-5.300 Control of Emissions from Solvent Cleaning .....	12
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>15</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>24</b>
<b>VI. ATTACHMENTS .....</b>	<b>30</b>
ATTACHMENT A .....	31
Construction Permit 0699-012 — Monthly VOC Emission Tracking Record.....	31
ATTACHMENT B .....	32
Construction Permit 0699-012 — Monthly Toluene Emission Tracking Record .....	32
ATTACHMENT C .....	33
Construction Permit 0699-012 — Monthly Xylene Emission Tracking Record.....	33
ATTACHMENT D .....	34
Construction Permit 0699-012 — Monthly HAP Emission Tracking Record .....	34
ATTACHMENT E .....	35
10 CSR 10-5.330 — Compliance Demonstration - Sample Record Form 1 .....	35
ATTACHMENT F.....	36
10 CSR 10-5.330 — Compliance Demonstration - Sample Record Form 2.....	36
ATTACHMENT G-1 .....	37
Construction Permit 102001-019 — Monthly VOC Emission Tracking Record.....	37
ATTACHMENT G-2.....	38
Construction Permit 102001-019 — Monthly Combined HAP Tracking Record.....	38
ATTACHMENT G-3.....	39
Construction Permit 102001-019 — Monthly Combined HAP Tracking Record.....	39
ATTACHMENT H.....	40
10 CSR 10-5.300 Compliance Demonstration — Solvent Containing Waste Transfer Log.....	40
ATTACHMENT I.....	41

---

10 CSR 10-5.300 Compliance Demonstration — Inspection/Maintenance/Repair/Malfunction Log.....	41
ATTACHMENT J .....	42
10 CSR 10-5.300 Compliance Demonstration — Purchase Records for Cold Cleaning Solvent .....	42
ATTACHMENT K .....	43
10 CSR 10-5.300 Compliance Demonstration — Employee Solvent Metal Cleaning Training Log.....	43
ATTACHMENT L .....	44
Fugitive Emission Observations .....	44
ATTACHMENT M .....	45
Opacity Emission Observations .....	45
ATTACHMENT N .....	46
Method 9 Opacity Emissions Observations .....	46
ATTACHMENT O .....	47
Inspection/Maintenance/Repair/Malfunction Log.....	47

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Canam Steel Corporation fabricates steel joists and joist girders at the installation in Franklin County. This installation is an existing major source of Volatile Organic Compounds (VOCs) in the St. Louis non-attainment area for ozone. The emissions are mainly generated during painting operations. Large girders are dipped into large open tanks. The installation has three (3) paint dip tanks. Several other emission sources include paint spray guns, welding, parts cleaning, and space heaters.

The reported actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	0.83	0.00	0.03	2.54	57.77	0.14	0.00	2.00
2007	0.98	0.00	0.04	3.03	97.37	0.09	0.00	1.07
2006	0.96	0.00	0.02	3.42	93.76	0.07	0.00	1.03
2005	1.08	0.00	0.07	3.30	96.44	0.00	0.00	1.12
2004	1.42	0.00	0.07	3.67	99.19	0.00	0.00	1.09

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	Paint Dip Tanks #1 and #2
EU0020	Paint Dip Tank #3
EU0030	Paint Spray Guns
EU0040	Cold Cleaners - Parts Cleaning

### 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.

Reference #	Description of Emission Unit
EP-3	Portable Kerosene-fired Space Heaters (1 MMBtu/hr)
EP-4	Nine (9) Natural Gas-fired Fixed Space Heater 6 units of 1.1 MMBtu/hr 3 units of 1.925 MMBtu/hr
EP-5	Metal Working – Roll Former, Drills, Iron Workers, Punches, Saws, Shears, Flame Cutting Torches, Grinding Units, Surfacing Units
EP-5	Plasma Cutting Table

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) Construction Permit No. 0699-012;
- 2) Construction Permit No. 102001-019; and
- 3) Construction Permit No. 102001-019A.

## **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.

None

### III. Emission Unit Specific Emission Limitations

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

<b>EU0010 through EU0030 – Painting Operations</b>		
Emission Unit	Description	2008 EIQ Reference #
EU0010	Paint Dip Tanks #1 and #2 - Two dip tanks accommodating large steel girders up to 110 feet in length, installed in 2000	EP-1
EU0020	Paint Dip Tanks #3 - Dip tank 65 ft long, 3 ft wide, 4 ft deep, installed in 2001	
EU0030	Paint Spray Guns - Two paint airless spray guns, manufactured in 1972 and 2006	EP-7

<p><b>Permit Condition EU0010-001 through EU0030-001</b></p> <p>10 CSR 10-5.330</p> <p>Control of Emissions From Industrial Surface Coating Operations</p>
--

**Emission Limitation:**

The permittee shall not emit to the atmosphere any VOC from any surface coating operation in excess of 3.5 lbs. VOC/gallon of coating (minus water and non-VOC organic compounds), the amount allowed in Table B of §5.330(4)(B).

**Monitoring:**

Compliance with the limitations of this regulation shall be determined by the following methods, as applicable and appropriate.

- 1) Compliance with emission limits may be demonstrated using the method referenced in 10 CSR 10-6.030(14)(C) using the one-hour bake. Emission performance shall be on the basis of a daily volume-weighted average of all coatings used in each surface coating operation as delivered to the coating applicator(s) on a coating line. The daily volume-weighted average (DAVG<sub>vw</sub>) is calculated by the following formula:

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

Where:

- A = daily gallons of each coating used (minus water and exempt solvents) in a surface coating operation.
- B = pounds of VOC per gallon of coating (minus water and exempt solvents).
- C = total daily gallons coating used (minus water and exempt solvents) in a surface coating

operation.

n = number of all coatings used in a surface coating operation

- 2) Compliance with the emission limits in Table B may also be demonstrated on pounds of VOC per gallon of coating solids basis. The determination is made by first converting the emission limit in Table B to pounds of VOC per gallon of coating solids as shown in the following three (3) steps:

$$(1) \frac{\text{lbs VOC / gal coating (from Table B)}}{7.36 \text{ lbs / gal (average density of solvents)}} = \text{Volume fraction of VOC}$$

$$(2) 1 - \text{Volume fraction of VOC} = \text{Volume fraction solids}$$

$$(3) \frac{\text{lbs VOC / gal coating (from Table B)}}{\text{Volume fraction of solids}} = \frac{\text{lbs VOC}}{\text{gal coatings solids}}$$

This value (from step 3) is the new emission limit. It is equivalent to the emission limit in Table B on a coating solids basis. The VOC per gallon of coating solids for each coating solids used is then determined using the method referenced in 10 CSR 10-6.030(14)(C) using the one-hour bake. The composite daily weighted average of pounds of VOC per gallon of coating solids as tested for in the actual coatings used is compared to the new emission limit. Source operations on a coating line using coatings with a composite actual daily weighted average value less than or equal to the new emission limit, are in compliance with this rule; or

- 3) Compliance with the emission limits in §5.330(4)(B), Table B may be determined on a pounds of VOC per gallon of coating solids applied basis. An owner or operator may request his/her emission limit be modified to be equivalent to the emission limit in §5.330(4)(B), but in emission units of pounds of VOC emitted per gallon of coating solids applied. This new emission limit is derived by dividing the emission limit from §5.330(5)(B)2. by an appropriate value for transfer efficiency (TE) as determined by the Director. Prior to this determination, the owner or operator shall demonstrate to the satisfaction of the Director that an adequate, fully replicable TE test method exists for the source operation. Upon approval of the TE demonstration, the Director will develop an emission limit equivalent to the applicable emission limit in §5.330(4)(B).

**Recordkeeping:**

- 1) The permittee shall keep records detailing specific VOC sources as necessary for the Director to determine daily compliance. These may include:
- Daily records of the type and the quantity of coatings used daily;
  - The coating manufacturer's formulation data for each coating on forms provided or approved by the Director;
  - Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
  - All test results to determine capture and control efficiencies, TEs and coating makeup;
  - Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - Monthly records of the quantity of pieces or materials coated daily; and
  - Any additional information pertinent to determining compliance.

- 2) Records such as daily production rates may be substituted for actual daily coating use measurements provided the owner submits a demonstration approved by the Director that these records are adequate for the purposes of this rule.

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation. Any deviations from this permit condition shall be reported in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**Permit Condition EU0010-002**

10 CSR 10-6.060  
Construction Permits Required  
Construction Permit No. 0699-012, Issued May 25, 1999

**Emission Limitation:**

- 1) Canam Steel Corporation shall emit less than 188.9 tons of volatile organic compounds (VOC) from the two (2) dip tanks (EU0010) in any consecutive 12-month period.  
[Construction Permit 0699-012, Special Condition 1]
- 2) Canam Steel Corporation shall emit less than 100 tons of VOC from each of the two (2) dip tanks – EU0010 in any consecutive 12-month period. [Construction Permit 0699-012, Special Condition 2]
- 3) Canam Steel Corporation shall emit less than ten (10) tons each of the hazardous air pollutants (HAP's) xylene and toluene and less than 25 total tons of HAP's from the painting operation that includes the two (2) dip tanks (EU0010) in any consecutive 12-month period.  
[Construction Permit 0699-012, Special Condition 4]

**Monitoring/Recordkeeping:**

- 1) Canam Steel Corporation shall use Attachment A, "Monthly VOC Emission Tracking Record", or an equivalent form to verify compliance with the VOC emission limitations of Special Conditions 1 and 2 of Construction Permit 0699-012. [Construction Permit 0699-012, Special Condition 3]
- 2) Canam Steel Corporation shall use Attachment B, "Monthly Toluene Emissions Tracking Record"; Attachment C, "Monthly Xylene Emission Tracking Record"; and Attachment D, "Monthly HAP Emission Tracking Record" or equivalent forms to verify compliance with the emission limitations of Special Condition 3 of Construction Permit 0699-012.  
[Construction Permit 0699-012, Special Condition 5]

**Reporting:**

Canam Steel Corporation shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition or indicate that an emission limitation has been exceeded. [Construction Permit 0699-012, Special Condition 6]

**Permit Condition EU0020-002**

10 CSR 10-6.060

Construction Permits Required

Construction Permit No. 12001-019, Issued Dec 10, 2001

Correction to Permit No 102001-019; 102001-019A issued December 10, 2002

**Emission Limitation:**

Canam Steel Corporation shall emit into the atmosphere less than the listed amounts of the following pollutants in any consecutive twelve (12) month period from the equipment (Dip Tank #3 - EU0020) permitted herein: [Construction Permit No. 102001-019A, Special Condition 1A]

<b>Pollutant</b>	<b>Emission Limitation: (tons/12-month period)</b>
Ethyl Benzene	10
Toluene	10
Xylene (all isomers)	10
Combined Hazardous Air Pollutants (HAPs)	25
Volatile Organic Compounds (VOC)	40

**Monitoring/Recordkeeping:**

The permittee shall maintain an accurate record of VOC and HAPs emitted into the atmosphere from the installation. The permittee shall record the monthly and rolling twelve (12) month totals of VOC and HAP emissions from the installation. The permittee shall use Attachment G-1, *Monthly VOC Tracking Record*, Attachment G-2, *Monthly Combined HAP Tracking Record*, and Attachment G-3, *Monthly Individual HAP Tracking Record*, or equivalent form(s) for this purpose. The permittee shall maintain all records required by this permit, on-site, for the sixty (60) most recent months and shall immediately make such records available to any Missouri Department of Natural Resources' personnel upon request. [Construction Permit No. 102001-019A, Special Condition 1B].

**Reporting:**

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 (10) days after the end of the month during which the records required, as specified above, indicate that an emission limitation have been exceeded. Construction Permit No. 102001-019A, Special Condition 1C].

**Permit Condition EU0030-002**

10 CSR 10-5.300

Control of Emissions From Solvent Metal Cleaning

10 CSR 10-5.300(3)(B)4. Spray Gun Cleaners

**Operational Limitation/Equipment Specification:**

- 1) Cleaning of spray guns shall be accomplished by use of one (1) or more of the following methods:
  - a) Enclosed spray gun cleaning. Enclosed system spray gun cleaning shall consist of forcing solvent through the spray gun and/or spray gun parts. Spray guns and/or spray gun parts shall

only be cleaned in remote closed top spray gun cleaning machines under the following conditions:

- i) The spray gun cleaning machine is operated within the manufacturer's specifications and with the lid kept tightly closed at all times except when being accessed or maintained; and
  - ii) Removable containers (which shall not exceed thirty (30) gallons in size) for clean, used and waste solvent, are kept tightly closed except when being accessed or maintained;
  - b) Nonatomized spray gun cleaning. Nonatomized spray gun cleaning shall consist of placing solvent in the pressure pot and forcing it through the spray gun with the atomizing cap in place. Spray guns shall only be cleaned through nonatomized spray gun cleaning under the following conditions:
    - i) No atomizing air shall be used; and
    - ii) The cleaning solvent from the spray gun shall be directed into a pail, bucket, drum or other waste container that is closed when not in use;
  - c) Disassembled spray gun cleaning. Disassembled spray gun cleaning shall be accomplished by disassembling the spray gun to be cleaned and cleaning the components by one (1) of the following methods:
    - i) By hand in a spray gun cleaner, which shall remain closed except when in use; or
    - ii) By soaking in a spray gun cleaner, which shall remain closed during the soaking period and when not inserting or removing components; or
  - d) Atomized spray gun cleaning. Atomized spray gun cleaning shall consist of forcing the cleaning solvent through the gun and directing the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions. Cleaning of the nozzle tips of an automated spray equipment system is exempt from the requirements of 10 CSR 10-5.300(3)(B)4., unless the system is a robotic system that is programmed to spray into a closed container.
- 2) Any waste material removed from a spray gun cleaning system shall be disposed of by one (1) of the following methods or an equivalent method approved by the Director and EPA:
    - a) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or
    - b) Stored in closed containers for transfer to—
      - i) A contract reclamation service; or
      - ii) A disposal facility approved by the Director and EPA.
  - 3) Waste solvent shall be stored in closed containers only.

**Operator and Supervisor Training:**

- 1) Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the equipment.
- 2) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operator.
- 3) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each twelve (12) months.

**Reporting/Record Keeping:**

- 1) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. These records shall be kept current and made available for review on a monthly basis. The Director may require additional record keeping if necessary to adequately demonstrate compliance with this rule.

- 2) A record shall be kept of solvent metal cleaning training required by 10 CSR 10-5.300(3)(C).
- 3) The records shall be retained for five (5) years and shall be made available to the Director upon request.

<b>EU0040 – Cold Solvent Cleaning</b>		
Emission Unit	Description	2008 EIQ Reference #
EU0040	Cold metal parts washers	EP-2

<p><b>Permit Condition EU0040-001</b></p> <p>10 CSR 10-5.300</p> <p>Control of Emissions from Solvent Cleaning</p>
--

**Emission Limitation**

- 1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)).
- 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 and the U.S Environmental Protection Agency (EPA) must approve the alternative method.

**Operational Limitation/Equipment Specifications**

- 1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 2) When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
  - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
  - b) The solvent is agitated; or
  - c) The solvent is heated.
- 3) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining.
- 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.
- 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.
- 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.
- 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:
  - a) A freeboard ratio of at least 0.75;
  - b) Water cover (solvent must be insoluble in and heavier than water); or

- c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems must receive approval from the Director and EPA prior to their use.
- 8) Each cold cleaner shall be operated as follows:
  - 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.
  - b) Cleaned 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, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
  - c) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
  - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down until the leaks are repaired.
  - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the Director and EPA:
    - i) Reduction of the waste material to less than 20% VOC solvent by distillation and proper disposal of the still bottom waste; or
    - ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director and EPA.
  - f) Waste solvent shall be stored in covered containers only.
- 9) Operators must be trained as follows:
  - a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
  - b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
  - c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once every 12 months.

**Monitoring/Recordkeeping**

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment J):
  - a) Name and address of the solvent supplier.
  - b) Date of purchase.
  - c) Type of solvent purchased.
  - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment H). The record also shall include maintenance and repair logs that occurred on the degreaser (Attachment I). These records shall be kept current and made available for review on a monthly basis. The Director may require additional record keeping if necessary to adequately demonstrate compliance with this rule.
- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment K).
- 4) All records shall be retained for five years and be available to the Director upon request.

**Reporting**

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR) 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 following is only an excerpt from the regulation or code, and is provided for summary purposes only.

### **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 10-6.045 Open Burning Requirements**

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

- (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
- (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and
- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Canam Steel Corporation may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Canam Steel Corporation fails to comply with the provisions or any condition of the open burning permit.
  - a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.

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

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

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

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

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

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

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 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 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

### **10 CSR 10-6.150 Circumvention**

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

### **10 CSR 10-6.170**

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

##### **Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

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

**Recordkeeping:**

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

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

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

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

---

---

### **10 CSR 10-5.040 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 10-5.160 Control of Odors in the Ambient Air**

#### **This requirement is not federally enforceable.**

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

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

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:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter 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.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide 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 10-6.220 Restriction of Emission of Visible Air Contaminants**

#### **Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
- 2) Exception:
  - a) Existing sources<sup>1</sup> in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.

---

<sup>1</sup> Existing source - any equipment, machine, device, article, contrivance or installation in being, installed or in construction in the St. Louis metropolitan area on March 24, 1967 (Franklin County, January 18, 1972), except that if the source is altered, repaired, or rebuilt at a cost of fifty percent (50%) or more of its replacement cost exclusive of routine maintenance, it shall no longer be existing, but shall be considered new as defined in this regulation..

- b) A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) Observations must be made once per month. If a violation is noted:
  - b) Weekly observations shall be conducted for a minimum of eight consecutive weeks. Should no violation of this regulation be observed during this period then-
  - c) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
  - d) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachment M (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with 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 motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

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

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

- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

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

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

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

### 10 CSR 10-6.065(6)(C)1.C General 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'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 Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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, 901 North 5th Street, Kansas City, KS 66101, 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 application requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

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

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

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

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

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

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

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

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

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

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

This permit may be reopened for cause if:

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

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

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

## **VI. Attachments**

Attachments follow.

**Attachment A**  
 Construction Permit 0699-012 — Monthly VOC Emission Tracking Record

This worksheet covers the period from \_\_\_\_\_ to \_\_\_\_\_  
 (month/Year) (month/Year)

Column A	Column B	Column C	Column D	Column E	Column F	Column G <sup>4</sup>	Column H <sup>5</sup>
Date (month/ year)	Process	Amount of Material Processed (gallons)	VOC Content (lbs/gallons) <sup>1</sup>	Single Tank Monthly VOC Emissions (tons) <sup>2</sup>	Single Tank 12-Month VOC Emissions (tons) <sup>3</sup>	Process Monthly VOC Emissions (tons)	Process 12 – Month VOC Emissions (tons)
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						
	Tank 1						
	Tank 2						

1. Weighted average VOC content of all materials used in tank during the month
2. Column E = Column C x Column D x 0.0005
3. Column F = Previous month's Column F + current Column E – Column E same month last year (total of less than 100 indicates compliance)
4. Column G = Column E Tank 1 + Column E Tank 2
5. Column H = Previous month's Column H + current Column G – Column G same month last year (total of less than 188.9 indicates compliance)









**Attachment F**

10 CSR 10-5.330 — Compliance Demonstration - Sample Record Form 2

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

Note 1: Daily Volume-Weighted Average (DAVG<sub>vw</sub>) = [Sum of Column H ÷ Sum of Column F]

Instructions:

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



















**Attachment N**

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

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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



## STATEMENT OF BASIS

### 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 May 30, 2008;
- 2) Initial Part 70 Operating Permit OP2003-041, Issued September 23, 2003
- 3) 2008 Emissions Inventory Questionnaire, received March 18, 2009; and
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

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

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

- 1) 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*

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.

- 2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Process*  
This rule had been checked in the permit application as an applicable rule to the installation, however it has been determined that there is no unit subject to this rule, therefore it is not included in the operating permit.

3) 10 CSR 10-5.120, *Information on Sales of Fuels to be Provided and Maintained*

This regulation is not applicable because the facility does not use coal or residual fuels for heating. Therefore, this regulation was not cited in the operating permit.

4) 10 CSR 10-5.220, *Petroleum Liquid Storage, Loading and Transfer*

This regulation does not apply to the installation since the permittee stores only fuel oils having a true vapor pressure less than 1.5 psia at 90 degrees Fahrenheit.

**Construction Permit Revisions**

This operating permit makes no revisions to construction permits for this installation.

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

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

40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

The installation has reported the following storage vessels:

Tank	Contents	Capacity (Gallons)	Date of Manufacturer
1	Paint	10,000	1986
2	Paint	10,000	1986
3	Paint	10,000	1986
4	Paint	10,000	1986

The storage vessels listed above either do not contain a chemical regulated by 40 CFR Part 60, Subpart K, Ka or Kb and/or the tank's capacity is below the applicability cutoff level of 40 CFR Part 60, Subpart K, Ka or Kb. Therefore, the storage tanks are not subject to the NSPS and have been listed as emission units without limitations in the operating permit.

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

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

1) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

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

The permittee operates maintenance parts cleaner using stoddard (petroleum solvent) which is not a halogenated solvents as defined in 40 CFR 63.460, therefore the parts washer is not subject to the MACT standards for halogenated solvent cleaning.

2) 40 CFR Part 63, Subpart MMMM, *Miscellaneous Metal Parts (Surface Coating)*

The Subpart applies to a facility that owns or operates a miscellaneous metal parts and products surface coating operation that is a major source, or is located at a major source, or is part of a major source of HAP emissions. The miscellaneous metal parts and products surface coating facility is a major source of HAP for purposes of this subpart if it emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year or if it is located at a facility that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

On October 22, 2009, Canam Steel Corporation requested the installation's HAPs voluntary limitation that established area source status through the Initial Part 70 Operating Permit OP2003-041 removed and remain a major source. Therefore, the voluntary limitations of the Initial Part 70 Operating Permit OP2003-041 are not incorporated into this permit and by becoming a major source of HAPs, the provisions of 40 CFR Part 63, Subpart MMMM are applicable.

3) 40 CFR Part 63, Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

On July 23, 2008, EPA promulgated 40 CFR Part 63, Subpart XXXXXX (6X) that regulates HAPs from nine metal fabrication and finishing facilities. Subpart 6X applies to area sources where the primary activity of the facility is in one of the following nine source categories that use or have the potential to emit five specific Metal Fabrication and Finishing HAPs (MFHAPs) – cadmium, chromium, lead, manganese and nickel:

EPA Source Category	SIC Code	NAICS Code
1. Electrical & Electronic Equipment Finishing Operations	3621, 3699	335312, 335999
2. Fabricated Metal Products	3499, 3499	332117, 332999
3. Fabricated Plate Work (Boiler Shops)	3443, 3443, 3443	332313, 332410, 332420
4. Fabricated Structural Metal Manufacturing	3441	332312
5. Heating Equipment, except electric	3433	333414
6. Industrial Machinery & Equipment: Finishing Operations	3531, 3533, 3561	333120, 333132, 333911
7. Iron and Steel Forging	3462	332111
8. Primary Metals Products Manufacturing	3399	332618
9. Valves and Pipe Fittings	3494	332919

Processes affected include abrasive blasting, dry grinding and dry polishing with machines, dry machining, welding, and spray painting.

Canam Steel Corporation fabricates steel joists and joist girders (NAICS code 332312) and is potentially an existing affected source. Since the installation chose to remove the voluntary limit that made the installation an area source for HAPs, the provisions of this subpart are not applicable.

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

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos*

See “Other Air Regulations Determined Not to Apply to the Operating Permit” section of the statement of basis

### **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.

### **Other Regulatory Determinations**

1) 10 CSR 10-6.220, *Restriction of Emissions of Visible Air Contaminants*

The significant emissions units at this installation do not emit particulate or other condensibles which would reduce the transmission of light or obscure the view of an object in the background. Because the significant emissions units at this facility are VOC emitting sources, we have elected to require the applicant to conduct monthly monitoring of opacity from the building stacks/roof vents with a more frequent observations should a violation be observed.

2) 10 CSR 10-5.300, *Control of Emissions from Solvent Metal Cleaning*

This rule applies to all processes that use cold cleaners, open top vapor degreasers or conveyORIZED degreasers, using nonaqueous solvents to clean and remove soils from metal surfaces. Therefore, the above regulation was cited in the operating permit – see permit conditions EU0030-002 and EU0040-001.

3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*

According to 10 CSR 10-6.400(1)(B)7, fugitive emissions are exempt from this rule. Particulate emissions from shield metal arc welding units (SMAW) E6013 and E7018, and particulate emissions from gas metal arc welding (GMAW) E70S are fugitive emissions and are exempt from the provisions of this rule according to 10 CSR 10-6.400(1)(B)7.

Paint Spray Guns (EU0030) — The paint spraying equipment is used within the main building. The occasional spray coating takes place in the dip coating area. The air emissions generated by the paint spraying process are not captured and vented through a discrete stack or vent. The emissions

eventually reach the outdoor through building openings. Therefore, the paint spray guns are not subject to this rule.

- 4) The units listed in the "Emission Units Without Limitations" section of this permit either have no applicable regulations associated with them or are considered insignificant activities by the operating permit application. Those units include, but are not limited to, all natural gas/LPG units with a maximum heat input of less than ten (10) MMBtu/hr and those that burn other fuels and have a heat input of less than one (1) MMBtu/hr that emits only products of combustion.

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

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

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

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

Prepared by:

---

Berhanu A. Getahun  
Environmental Engineer