



## 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:** OP2013-023A  
**Expiration Date:** April 17, 2018  
**Installation ID:** 007-0047  
**Project Number:** 2013-08-046

**Installation Name and Address**

Cerro Flow Products LLC  
1500 Industrial Drive  
Mexico, MO 65265  
Audrain County

**Parent Company's Name and Address**

Cerro Flow Products LLC  
1500 Industrial Drive  
Mexico, MO 65265

**Installation Description:**

Cerro Flow Products LLC is a copper casting facility located in Mexico, Missouri. The installation manufactures copper billets from copper cathodes, billet sizing cuttings, and scrap copper tubing from installations making tubing from the copper billets. The main sources of pollutants at the installation are the vertical copper melt furnace, the electric holding furnace charcoal cover, and billet sawing. Other smaller emission sources are small fuel tanks, space and water heaters, and the burning bar used to clear solidified metal from the vertical furnace drain port. The installation is a major source of CO. The installation operates an emergency diesel generator that is subject to the area source provisions of 40 CFR Part 63, Subpart ZZZZ - *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

This amended permit removes the requirements of 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* for the vertical copper melt furnace (EP01), the billet saw (EP10), and the supplemental saw (EP21) as the emissions do not duct to a stack or vent that emits outside the building into the ambient air.

DEC 02 2013

Effective Date

  
Director or Designee

Department of Natural Resources

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>3</b>
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>5</b>
PERMIT CONDITION PW001 .....	5
10 CSR 10-6.060 Construction Permits Required	
Construction Permit 012006-014, Issued January 25, 2006	
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>6</b>
VERTICAL MELT FURNACE	
PERMIT CONDITION EP01-001 .....	6
10 CSR 10-6.060 Construction Permits Required	
Construction Permit 0298-010, Issued December 9, 1997	
PERMIT CONDITION EP01-002 .....	7
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
EMERGENCY GENERATOR	
PERMIT CONDITION EP04-001 .....	8
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	
40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for HAP for Stationary Reciprocating Internal Combustion Engines	
INDIRECT HEATING EQUIPMENT	
PERMIT CONDITION EP11-001 .....	13
10 CSR 10-6.405 Restriction of PM Emissions From Fuel Burning Equipment Used for Indirect Heating	
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>14</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>21</b>
<b>VI. ATTACHMENTS .....</b>	<b>26</b>
ATTACHMENT A .....	27
Fugitive Emission Observations	
ATTACHMENT B .....	28
Method 22 Opacity Emission Observations	
ATTACHMENT C .....	29
Method 9 Opacity Emissions Observations	
ATTACHMENT D .....	30
Inspection/Maintenance/Repair/Malfunction Log	
ATTACHMENT E .....	31
Monthly CO Worksheet	
ATTACHMENT F.....	32
Monthly Copper Charging Worksheet	
ATTACHMENT G .....	33
10 CSR 10-6.400 Compliance Demonstration	
ATTACHMENT H .....	34
10 CSR 10-6.405 Compliance Demonstration	
ATTACHMENT I.....	35
Abbreviations and Acronyms	

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Cerro Flow Products LLC (formerly Cerro Copper Casting Co.) is a copper casting facility located in Mexico, Missouri. Cerro Flow Products LLC manufactures copper billets from copper cathodes, billet sizing cuttings and scrap copper tubing from installations making tubing from the copper billets. The main sources of pollutants at the installation are the vertical copper melt furnace, the electric holding furnace charcoal cover and billet sawing. Other smaller emission sources are small fuel tanks, space and water heaters and the burning bar used to clear solidified metal from the vertical furnace drain port. The installation is a major source of CO.

In this amendment the requirements of 10 CSR 10-6.220 *Restriction of Visible Air Contaminants* for EP10 and EP21 have been removed as these emission units do not currently vent to the ambient atmosphere by stack or vent; therefore, conducting Method 22 or Method 9 observations to demonstrate compliance would be technically infeasible. The emissions from these emission units are still subject to 10 CSR 10-6.170 *Restriction of PM to the Ambient Air Beyond the Premises of Origin* which allows for zero visible emissions in the ambient air beyond the property line of origin.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter < Ten Microns (PM <sub>10</sub> )	17.12	18.15	14.86	19.87	21.12
Particulate Matter <= 2.5 Microns (PM <sub>2.5</sub> )	15.11	16.06	13.01	17.42	18.70
Sulfur Oxides (SO <sub>x</sub> )	1.34	1.43	1.14	1.52	1.65
Nitrogen Oxides (NO <sub>x</sub> )	2.50	2.72	2.20	3.37	3.68
Volatile Organic Compounds (VOC)	4.61	5.13	4.23	5.02	5.95
Carbon Monoxide (CO)	117.43	126.22	109.73	144.61	155.56
Lead (Pb)	0.02	0.02	0.02	0.02	0.02
Hazardous Air Pollutants (HAPs)	0.02	0.04	0.03	0.04	0.05
Ammonia (NH <sub>3</sub> )	0.0002	0.0002	0.0001	0.02	0.02

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description
EP-01	Vertical Copper Melt Furnace, Southwire Mfg 1995, Pipeline Natural Gas/Propane, 30 MMBtu/hr, 32 ton/hr maximum charge rate, limited by process to 18.75 tph.
EP-04	Emergency Electrical Generator, Cummings model GTA 855A, In Service 1996, 2.826 MMBtu/hr, Pipeline Natural Gas
EP-11	Steam Cleaner, 0.001 MMBtu/hr, Kerosene

**EMISSION UNITS WITHOUT LIMITATIONS**

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. These emission sources are subject to the plantwide emission limitations.

Emission Unit	Description
EP-02	Covered Launder, Southwire Mfg 1995, Pipeline Natural Gas/Propane 3.465 MMBtu/hr
EP-03	Electric Holding Furnace with Charcoal Float Cover, Southwire Mfg 1995, Pipeline Natural Gas for start-up, 1.0 MMBtu/hr <i>Electric Holding Furnace with a consumable charcoal cover. The charcoal is used as an antioxidation cover for the molten copper flowing into the holding furnace and then into the casting block. Charcoal is added at a rate of 15 lb/hr providing a layer of ash minimizing the oxidation of the molten copper.</i>
EP-05	Space Heaters, 0.35 MMBtu/hr, Pipeline Natural Gas
EP-06	Cold Solvent Cleaners. Capacity of the unit is 80 gallons.
EP-07	Diesel Oil Storage Tank, 500 gallon capacity
EP-08	Kerosene Storage Tank, 75 gallon capacity
EP-09	Gasoline Storage Tank, 75 gallon capacity
EP-10	Billet Saw
EP-12	Portable Heaters, 0.45 MMBtu/hr, Kerosene - <i>Propane fueled portable heating units each with a heat input of less than 1 MMBtu/hr. (Combined heat input of 0.45 MMBtu / hour)</i>
EP-13	Hot Water Heater, 225 Btu/hr, Natural Gas
EP-14	Sand Handling Material Handling Operations – <i>Annual throughput of less than 5,000 tons of sand. Sand handling operations occur inside the facility; therefore, PM generated by handling operations is subject to settlement prior to fugitive emission off site (estimated 3.75% capture and control).</i>
EP-15	Copper Handling Material Handling Operations - Copper scrap and billets <i>Handling of copper occurs indoors causing some emissions to settle out (3.75% capture and control). All copper charged to the furnace is free of dirt and debris because these contaminants cause quality problems. Scrap coming into the facility can have an oil film which further reduces particulates. PM generated is greater than 10 microns.</i>
EP-16	Slag Handling Material Handling Operations - <i>Slag with an annual throughput of less than 1,000 tons. Slag handling operations occur inside the facility; therefore, PM generated by handling operations is subject to settlement prior to emission off site (estimated at 3.75% capture and control).</i>
EP-17	Hand Grinding Billets, Fabric Filter Collector - <i>Hand grinding of finished billets to remove imperfections inside building. An average of 0.5 oz. of copper is removed from each billet. Maximum billet production is 278,772 billets/yr.</i>
EP-18	Propane Vaporizer, 750 Btu/hr, Propane
EP-19	Burning Bar Operations
EP-20	Casting Block Lubrication <i>Graphite application to casting block. Graphite is added to the casting block as a lubricant material. Maximum graphite application is 10 tpy.</i>
EP-21	Supplemental Sawing <i>Horizontal Billet Saw. Maximum capacity is 6,000 tpy billet processed. Process Rate constrained by other process limitations.</i>

## II. Plant Wide Emission Limitations

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

**PERMIT CONDITION PW001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 012006-014, Issued January 25, 2006

**Emission Limitation:**

Special Condition 2.A: The permittee shall emit less than 250.0 tons of CO in any consecutive 12-month period from the entire installation.

**Monitoring/Recordkeeping:**

1. Special Condition 2.B: The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of CO emissions emitted into the atmosphere from the entire installation. Attachment E or equivalent forms approved by the Air Pollution Control Program shall be used for recordkeeping.
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

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

### III. Emission Unit Specific Emission Limitations

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

<b>Vertical Melt Furnace</b>	
<b>Emission Unit</b>	<b>Description</b>
EP01	Vertical Copper Melt Furnace, Southwire Mfg 1995, Pipeline Natural Gas/Propane, 30 MMBtu/hr, 32 ton/hr maximum charge rate, average cast rate is 18.75 tph. The cast rate is averaged over a 24 hour period and is limited by process.

**PERMIT CONDITION EP01-001**  
 10 CSR 10-6.060 Construction Permits Required  
 Construction Permit 0298-010, Issued December 9, 1997

**Emission Limitations:**

1. Special Condition 2.A: The permittee shall not exceed a CO concentration set point of 0.75 percent at the furnace burner tips while casting 12 3/8 inch or 13 5/8 inch billets.
2. Special Condition 2.B: The permittee shall not exceed a CO concentration set point of 1.3 percent at the furnace burner tips while casting 8.5 inch billets.
3. Special Condition 2.C: No more than 35 percent of the total copper melted in any consecutive 12-month period shall be scrap copper<sup>1</sup>.
4. Special Condition 2.D: Excessively oily material shall not be charged into the vertical melting furnace.
5. Special Condition 9: During any startup or shutdown, the burners will be operated in diffusion mode<sup>2</sup> no longer than one hour. The recordkeeping requirements below shall not apply during this period of time.
6. Special Condition 10: In any emergency shutdown or breakdown, the permittee shall immediately take practical steps to modify operations to reduce the emission of air contaminants. The Director of the Air Pollution Control Program may require feasible and practical modifications in the operation to reduce emissions of air contaminants.
7. Special Condition 11: The permittee is prohibited from sustained operation of the vertical copper melting furnace at burner tip CO concentrations greater than 0.75 percent, except during startup, shutdown and while casting 8.5 inch billets. When casting 8.5-inch billets, Emission Limitation #2. applies.

**Monitoring/Recordkeeping:**

1. Special Condition 4: The permittee shall maintain daily records of the CO set point at the burner tips. The records shall include any upset conditions that result in the resetting of the CO concentration set point above the levels allowed in Emission Limitations #1 and #2. These records shall include, but

<sup>1</sup> Scrap copper is rejected copper tubing and other rejected shapes from other facilities and copper chips recovered from the cutting, sizing, and finishing operations for the copper billets at this facility.

<sup>2</sup> Diffusion Mode is the operating mode for the burner that will not use standard operating conditions and may cause deviations to occur in the set point condition of 0.75% CO at the burner tip.

are not limited to, the amount of deviation from the set point, time, duration and cause of upset and action taken to return the system to the set point.

2. Special Condition 5: The permittee shall maintain an accurate record of the scrap and total copper charged to the vertical copper melt furnace. The monthly and running 12-month totals shall be recorded on Attachment F or an equivalent form approved by the Air Pollution Control Program.
3. Special Condition 6: The permittee shall record the number and amounts of each shipment returned because of violations of excessively oily material.
4. Special Condition 7: All records shall be maintained on site for a minimum of five years and shall be made available to Missouri Department of Natural Resources' personnel upon verbal request.

**Reporting:**

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

**PERMIT CONDITION EP01-002**

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

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

**Monitoring:**

1. The permittee shall conduct opacity readings on this emission point using the procedures contained in U.S. EPA Test Method 22. Readings are only required when an emission unit is operating and when the weather conditions allow. If no visible are observed using these procedures, then no further observations would be required. If visible emissions are observed, the permittee would then conduct a Method 9 observation.
2. The following monitoring schedule shall be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
  - b) Observations shall 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
  - c) Observations shall 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:**

1. The permittee shall retain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission point and

- b) Whether the visible emissions exceeded the opacity limit.
- 2. The permittee shall retain records of any equipment malfunctions, using Attachment D or an equivalent form generated by the permittee.
- 3. The permittee shall retain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
- 4. These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.
- 5. All records shall be maintained for five years.

**Reporting:**

- 1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report compliance certification required by Section V of this permit.

<b>Emergency Generator</b>		
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>
EP04	2.826 MMBtu/hr, 404 HP, Spark Ignition Emergency Stationary Reciprocating Internal Combustion Engine, Natural Gas Fired. Installed 1996.	Cummings/GTA 855A

**PERMIT CONDITION EP04-001**  
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations  
40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for HAP for Stationary Reciprocating Internal Combustion Engines

**Operating Limitations:**

- 1. The permittee shall meet the following requirements: [§63.6603(a) and #5 on Table 2d to MACT ZZZZ]
  - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
  - d) Exceptions:
    - i) If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of MACT ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee shall report any

failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

- ii) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to MACT ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to MACT ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 mg of KOH per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee operator is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within two days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(j)]

### **Monitoring**

1. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
2. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
3. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to MACT ZZZZ apply. [§63.6625(h)]

### **Continuous Compliance Requirements**

1. The permittee shall be in compliance with the emission limitations and operating limitation in MACT ZZZZ that apply at all times. [§63.6605(a)]
2. At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by MACT ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]
3. The permittee shall demonstrate continuous compliance with each emission limitation and operating limitation in Table 2d to MACT ZZZZ that apply according to the following methods: [§63.6640(a) and #9 on Table 6 to MACT ZZZZ]
  - a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

- b) Develop and follow a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- 4. The permittee shall report each instance in which the permittee did not meet the requirements in Table 8 to MACT ZZZZ that apply. [§63.6640(e)]
- 5. The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under MACT ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in nonemergency situations for 50 hours per year, as described in §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under MACT ZZZZ and shall meet all requirements for non-emergency engines. [§63.6640(f)]
  - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
  - b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(4) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
    - i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
    - ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP- 002-3. [§63.6640(f)(2)(ii)]
    - iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of five percent or greater below standard voltage or frequency. [§63.6640(f)(2)(iii)]
  - c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(i) and (ii), the 50 hours per year for nonemergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
    - i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or nonemergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is

- operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. [§63.6640(f)(4)(i)]
- ii) The 50 hours per year for nonemergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)]
1. The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
  2. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
  3. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
  4. The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(3)(ii)(D)]
  5. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

**Recordkeeping:**

1. The permittee shall keep a copy of each report submitted to comply with MACT ZZZ. [§63.6655(a)(1)]
2. The permittee shall keep records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
3. The permittee shall keep records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
4. The permittee shall keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
5. The permittee shall keep the records required in Table 6 to MACT ZZZZ to show continuous compliance with each emission or operating limitation that applies. [§63.6655(d)]
6. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to their maintenance plan. [§63.6655(e)]
7. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]
8. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
9. All records shall be retained for five years.

**General Provisions:**

The permittee shall refer to Table 8 to MACT ZZZZ for MACT A applicability.

**Reporting**

1. For emergency stationary RICE with a site rating of more than 100 brake HP that operate or are contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), the permittee shall submit an annual report according to the following requirements: [§63.6650(h)]
  - a) The report shall contain the following information: [§63.6650(h)(1)]
    - i) Company name and address where the engine is located. [§63.6650(h)(1)(i)]
    - ii) Date of the report and beginning and ending dates of the reporting period. [§63.6650(h)(1)(ii)]
    - iii) Engine site rating and model year. [§63.6650(h)(1)(iii)]
    - iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§63.6650(h)(1)(iv)]
    - v) Hours operated for the purposes specified in §63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(2)(ii) and (iii). [§63.6650(h)(1)(v)]
    - vi) Number of hours the engine is contractually obligated to be available for the purposes specified in §63.6640(f)(2)(ii) and (iii). [§63.6650(h)(1)(vi)]
    - vii) Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report shall also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§63.6650(h)(1)(vii)]
    - viii) If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period. [§63.6650(h)(1)(viii)]
    - ix) If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken. [§63.6650(h)(1)(ix)]
  - b) The first annual report shall cover the calendar year 2015 and shall be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year shall be submitted no later than March 31 of the following calendar year. [§63.6650(h)(2)]
  - c) The annual report shall be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to MACT ZZZZ is not available in CEDRI at the time that the report is due, the written report shall be submitted to the Administrator at the appropriate address listed in §63.13. [§63.6650(h)(3)]
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>Indirect Heating Equipment</b>	
<b>Emission Unit</b>	<b>Description</b>
EP11	Portable Hot Water Pressure Washer, 0.45 MMBtu/hr, kerosene fired

**PERMIT CONDITION EP11-001**  
10 CSR 10-6.405 Restriction of PM Emissions From Fuel Burning Equipment Used for Indirect Heating

**Emission Limitation:**

The permittee shall not emit particulate matter in excess of 0.60 lb/MMBtu of heat input from EP11.

**Operational Limitation:**

The permittee shall calibrate, maintain and operate the emission unit according to the manufacturer's specifications and recommendations.

**Monitoring/Recordkeeping:**

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. These calculations are shown on Attachment H.
2. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

**Reporting:**

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

## IV. Core Permit Requirements

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

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

1. General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.
  - b) Yard waste.
3. Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the permittee fails to comply with the conditions or any provisions of the permit.
4. Cerro Flow Products LLC may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Cerro Flow Products LLC fails to comply with the provisions or any condition of the open burning permit.
  - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)11, the director shall not issue an open burning permit unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Recordkeeping. NSPS CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of 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 §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 §643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under §643.080 or §643.151, RSMo.
4. Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under §§643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5. Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

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

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

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

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than 18 months. [10 CSR 10-

6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

**10 CSR 10-6.080 Emission Standards for HAPs and  
40 CFR Part 61, Subpart M - National Emission Standard for Asbestos**

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

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

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

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

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

**10 CSR 10-6.150 Circumvention**

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

**10 CSR 10-6.170 Restriction of PM 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 PM emissions to go beyond the premises of origin in quantities that the PM may be found on surfaces beyond the property line of origin. The nature or origin of the PM 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 PM 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:**

1. 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.
2. The permittee shall maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two weeks for a period of eight weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
3. If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or once per month, the permittee may continue from that point forward in the established monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
4. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

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

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

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

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

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

**This requirement is not federally enforceable.**

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

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

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

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

**This requirement is federally enforceable only.**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.

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

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

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

- a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None

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

1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3. All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4. The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Boulevard, Lenexa, KS 66219, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and 40 CFR Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;

- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

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

Boulevard, Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

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

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

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

### **10 CSR 10-6.020(2)(R)39 Responsible Official**

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

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

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

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

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

## **VI. Attachments**

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





**Attachment C**

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



**Attachment E**  
 Monthly CO Worksheet

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	Column H
Date (month/year)	Type of Copper Billet Produced	Amount of Copper Charged to Furnace (tons)	CO Emission Factor <sup>1</sup> (lb/ton)	Furnace CO Emissions <sup>2</sup> (tons)	Charcoal Cover CO Emissions <sup>3</sup> (tons)	Monthly CO Emissions <sup>4</sup> (tons)	Aggregate CO Emissions <sup>5</sup> (tons)
	8-1/2 inch		5.153				
	12-3/8 inch		4.943				
	13-5/8 inch		0.92				
	8-1/2 inch		5.153				
	12-3/8 inch		4.943				
	13-5/8 inch		0.92				
	8-1/2 inch		5.153				
	12-3/8 inch		4.943				
	13-5/8 inch		0.92				
	8-1/2 inch		5.153				
	12-3/8 inch		4.943				
	13-5/8 inch		0.92				
	8-1/2 inch		5.153				
	12-3/8 inch		4.943				
	13-5/8 inch		0.92				
	8-1/2 inch		5.153				
	12-3/8 inch		4.943				
	13-5/8 inch		0.92				
	8-1/2 inch		5.153				
	12-3/8 inch		4.943				
	13-5/8 inch		0.92				
<b>Total CO Emissions<sup>6</sup> (tons):</b>							

<sup>1</sup>12-3/8 inch billet emission factor is the average emission factor from the Source test conducted on Sept. 18, 1997. 8.5 inch billet emission factors were derived from data collected at the Source Tests conducted on September 5 and 6, 1996 and on September 18, 1997. 13-5/8 inch billet emission factor from Source Test conducted June 11, 1998.

<sup>2</sup>Column E = (Column C) x (Column D) x (0.0005 ton/lb)

<sup>3</sup>Column F = (Monthly pounds charcoal used) x ( 0.0000225)

<sup>4</sup>Column G = Sum of Column E and Column F.

<sup>5</sup>Column H = Running total of CO emissions from most recent consecutive 12-month period.

<sup>6</sup>**Total CO Emissions of less than 250.0 tons in any consecutive 12-month period indicates compliance.**



**Attachment G**  
 10 CSR 10-6.400 Compliance Demonstration

<b>Emission Unit</b>	<b>Unit Description</b>	<b>Process Weight Rate (tph)</b>	<b>Emission Factor (lb/ton)</b>	<b>Calculated Emission Rate (lb/hr)</b>	<b>Emission Limit (lb/hr)</b>
EP01	Vertical Copper Melt Furnace	18.75	0.395	7.41	29.22
EP03	Metal Charging	18.75	0.04	2.24	29.24
	Charcoal Float Cover	0.02	17		
EP10	Billet Saw	18.75	0.2	3.75	29.22
EP17	Hand Grindings	25	0.0313	0.78	35.43
EP21	Supplemental Sawing	18.75	0.2	3.75	29.22

**Attachment H**  
 10 CSR 10-6.405 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.405 *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating*. Installation's Total Heat Input (Q) in MMBtu/hr:

Emission Unit	Description	MHDR (MMBtu/hr)
EP11	Portable Hot Water Pressure Washer	0.45
EP13	Hot Water Heater	0.000225
EP18	Propane Vaporizer	0.00075
<b>Total Q:</b>		0.451

The maximum allowable PM emission limitation for new indirect heating sources having an intermediate total heat input below 10 MMBtu/hr is 0.60 lb/MMBtu. [10 CSR 10-6.405(3)(E)]

Emission Unit	Description	Emission Factor (lb/Mgal)	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)
EP11	Portable Hot Water Pressure Washer	2	0.015	0.60

The emission factor was taken from FIRE for Process SCC 10200503 for kerosene. The average heating value of 135 MMBtu/Mgal for kerosene used to convert the emission factor from lb/Mgal to lb/MMBtu was taken from AP-42 Appendix A. The calculations demonstrate that the emission units have worst-case emissions far below the applicable emission limit while being properly maintained and operated; therefore, no monitoring or recordkeeping other than maintenance records are required while combusting kerosene. The emission unit is in compliance with the emission limit without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

**Attachment I**  
Abbreviations and Acronyms

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

## 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 February 27, 2012
2. 2011 Emissions Inventory Questionnaire, received April 2, 2012
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
4. FIRE
5. Construction Permit 0894-027, Issued August 4, 1994
6. Construction Permit 0298-010, Issued December 9, 1997
7. No Construction Permit Required Determination Project 2000-09-083
8. Construction Permit 012006-014, Issued January 25, 2006

### Facility Information

Cerro Flow Products LLC is a copper foundry (SIC 3366) that produces solid copper billets from high purity copper scrap materials consisting mostly of copper cathodes, scrap copper tubing from other facilities and copper chips from the billet sizing operation at this facility. Since the materials being charged to the furnace do not require any smelting or refining prior to being cast into billets, this facility is not a secondary copper smelting facility and is, therefore, not a Named Installation as designated by 10 CSR 10-6.020(3)(B), Table 2. The raw material copper is usually of purity greater than 99.9 percent. The other impurities in the stock charged to the furnace originate from residual drawing oils and dirt on the tubing.

The facility uses a natural gas or propane fired vertical melting furnace to melt the high purity copper cathodes and tubing. The copper is batch charged into the top of the furnace and is melted as it proceeds downward. The furnace operates in an oxygen lean atmosphere, as excess oxygen will oxidize the copper and reduce the purity of the final product. To achieve an oxygen lean atmosphere, CO is added to the inlet gas stream. For this facility, the inlet CO was originally set at 1.75 percent. Any residual oxygen in the copper must be removed by adding phosphorus to the molten copper downstream from the furnace. The copper exits through a tap hole in the bottom of the furnace and flows through an enclosed launder to an electric holding furnace. The metal is then transferred, within the furnace, to water-cooled molds. After leaving the molds, the copper is then cut, tested, marked and shipped to copper tube producing mills.

The facility normally operates 24 hours a day, five days a week for 50 weeks annually. Normal operations commence around midnight on Monday morning and are continuous until the furnace is shut down Friday evening. The copper not frozen to the sides of the vertical melting furnace upon shutdown is retained in a molten state in the electrical holding furnace. The two days of down time at the end of the week are used to check the system and perform routine maintenance. The final two weeks during the regular calendar year are used to conduct maintenance on the furnace and copper molds.

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

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

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable because the installation is in an ozone attainment area.

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

This rule does not apply to combustion equipment that uses exclusively pipeline grade natural gas and therefore does not apply to the natural gas fired emergency generator engine. [10 CSR 10-6.260(1)(A)] It is highly unlikely that the 0.45 MMBtu/hr kerosene portable heater and the 0.001 MMBtu/hr kerosene steam cleaner would ever exceed the limitations of this rule and therefore no conditions have been included.

#### *10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes*

This rule does not apply to any of the processes at this installation because they all have a potential to emit PM below allowable emissions based on process weight. [10 CSR 10-6.400(1)(B)16] Calculations demonstrating compliance can be found in Attachment G.

### **Construction Permits**

1. Construction Permit 0894-027, Issued August 4, 1994  
This permit was issued to construct a vertical copper melting furnace, enclosed launder, and electric holding furnace. This permit has special conditions which are not included because they were superseded by Construction Permit 012006-014.
2. Construction Permit 0298-010, Issued December 9, 1997  
This permit was issued as a revision to Construction Permit 0894-027. This permit contains special conditions which appear in this operating permit as Permit Condition EP01-002. Special Conditions 1 and 3 are superseded by Construction Permit 012006-014. As a result the reporting requirements associated with those conditions contained in Special Condition 8 are also not included.
3. No Construction Permit Required Project #2000-09-083, Completed September 25, 2000  
This determination was made for the removal of 1000 gallons of propane.
4. Construction Permit 012006-014, Issued January 25, 2006  
This permit was issued for the installation of one billet saw which de-bottlenecked the hold furnace and vertical melt furnace. The replacement of a 150 gallon diesel tank with a 500 gallon tank was also permitted. This permit contains special conditions which appear in this operating permit as Permit Condition PW001.

### **NSPS Applicability**

40 CFR Part 60, Subpart M - *Standards Of Performance For Secondary Brass And Bronze Production Plants*

This rule applies to brass and bronze production plants. Brass and bronze are alloys of copper; however the billets produced at the installation are typically greater than 99.9 percent pure copper and are not considered brass or bronze. Therefore this rule does not apply.

40 CFR Part 60, Subpart P- *Standards of Performance for Primary Copper Smelters*

This regulation applies to the production of copper from copper ores. As this source only melts pure copper, the regulation is not applicable. [§60.160 and §60.161]

**MACT Applicability**

40 CFR Part 63, Subpart QQQ - *National Emission Standards for HAPs for Primary Copper Smelting*

This rule does not apply because the installation does not operate a primary copper smelter nor is it located at a major source of HAP. [§63.1441 and §63.1459]

40 CFR Part 63, Subpart ZZZZ - *National Emission Standard for HAPs for Stationary Reciprocating Internal Combustion Engines*

The spark ignition emergency generator engine (EP04) is subject to the requirements of this rule for existing engines located at an area source of HAP.

40 CFR Part 63, Subpart EEEEEEE - *National Emission Standards for HAPs for Primary Copper Smelting Area Sources*

This regulation applies to the production of copper from copper ores. As this source only melts pure copper, the regulation is not applicable. [§63.11151]

40 CFR Part 63, Subpart FFFFFFF - *National Emission Standards for HAPs for Secondary Copper Smelting Area Sources*

This rule applies to facilities that process copper scrap in blast furnace and converter or that use another pyrometallurgical purification process to produce anode copper from copper scrap, including low-grade copper scrap. The installation processes high-grade copper cathodes, scrap tubing, saw chips, and billets in the vertical melting furnace. Molten copper is transferred from the vertical melting furnace through an enclosed launder to an electric holding furnace. The copper is then transferred within the furnace to water-cooled molds. This process does not contain a converter or other pyrometallurgical process to purify the copper. Since the installation does not produce anode copper, their process is not considered a secondary copper smelter and this rule does not apply. [§63.11158]

40 CFR Part 63, Subpart TTTTTT - *National Emission Standards for HAPs for Secondary Nonferrous Metals Processing Area Sources*

This rule applies to secondary nonferrous metals processing facilities which are defined in this rule as a brass and bronze ingot making, secondary magnesium processing, or secondary zinc processing plant that uses furnace melting operations to melt post-consumer nonferrous metal scrap to make products including bars, ingots, blocks, or metal powders. The installation melts high purity copper and casts solid copper billets, therefore this rule does not apply.

40 CFR Part 63, Subpart XXXXXX - *National Emission Standards for HAPs Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

This rule does not apply because the installation is not engaged in any of the source categories covered by this rule. [Table 1 to Subpart XXXXXX]

40 CFR Part 63, Subpart ZZZZZZ - *National Emission Standards for HAPs: Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries*

The installation melts copper to cast copper billets. The copper foundry definition in this rule excludes primary or secondary metal producers that cast molten copper to produce billets. Therefore this rule does not apply. [§63.11556]

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

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

### CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring*

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.

### Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO<sub>2</sub>e to be 100,000 tons per year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of CO<sub>2</sub>e for this installation are calculated to be 18,221.01 tons, classifying the installation as a minor source of GHGs.

Should the installation's actual greenhouse gas emissions exceed the 25,000 metric ton threshold, it would be subject to 40 CFR Part 98 - *Mandatory Greenhouse Gas Reporting Rule*. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's actual CO<sub>2</sub> emissions were not included within this permit.

### Installation PTE

Pollutant	Potential to Emit (tpy) <sup>1</sup>
CO	275.01
CO <sub>2</sub> e	18,221.01
HAP	0.30
NO <sub>x</sub>	24.54
PM <sub>10</sub>	129.47
PM <sub>25</sub>	127.55
SO <sub>x</sub>	3.90
VOC	16.86

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted:

- ♦ Emergency engines evaluated at 500 hours per year.
- ♦ The installation is limited to 250.0 tpy of CO by Permit Condition PW001.

### Other Regulatory Determinations

10 CSR 10-6.405 *Restriction of PM Emissions from Fuel Burning Equipment Used for Indirect Heating*

This rule does not apply to the indirect heating equipment that is fueled by natural gas and propane. [10 CSR 10-6.405(1)(B)] This rule does apply to the indirect heating equipment that is fueled by kerosene. This rule has been applied to EP11 in Permit Condition EP11-001. This rule is not applicable to EP12 as this unit is direct fired.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Condition EP01-002). EP03, EP10, EP17, and EP21 are subject to this regulation, but conditions were not included within this permit. These emission sources do not currently vent to the ambient atmosphere by a stack or vent; therefore, conducting Method 22 or Method 9 observations to demonstrate compliance is technically infeasible. The visible emissions from these sources will instead be monitored under the provisions of 10 CSR 10-6.170 *Restriction of PM to the Ambient Air Beyond the Premises of Origin*. 10 CSR 10-6.170 allows for zero emissions to remain visible in the ambient air beyond the property line of origin.

**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:

---

Alana L. Rugen, EIT  
Environmental Engineer II

Mr. Marlin Chitwood  
Cerro Flow Products LLC  
1500 Industrial Drive  
Mexico, MO 65265

Re: Cerro Flow Products LLC, 007-0047  
Permit Number: **OP2013-023A**

Dear Mr. Chitwood:

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

The requirements of 10 CSR 10-6.220 *Restriction of Visible Air Contaminants* for EP10 and EP21 have been removed as these emission units do not currently vent to the ambient atmosphere by stack or vent; therefore, conducting Method 22 or Method 9 observations to demonstrate compliance would be technically infeasible. The emissions from these emission units are still subject to 10 CSR 10-6.170 *Restriction of PM to the Ambient Air Beyond the Premises of Origin* which allows for zero visible emissions in the ambient air beyond the property line of origin.

Please note this amendment does not alter or change any other requirements required by Operating Permit OP2013-023. You are reminded that your current operating permit will expire on April 17, 2018. You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:cjk

Enclosures

c: Northeast Regional Office  
PAMS File: 2013-08-046