



Missouri Department of Natural Resources
Air Pollution Control Program

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 here in

Operating Permit Number: OP2010-038A
Expiration Date: May 2, 2015
Installation ID: 087-0001
Project Number: 2005-05-048

Installation Name and Address

Exide Technologies-Canon Hollow Plant
25102 Holt Rd 250
P.O. Box 156
Forest City, MO 64451
Holt County

Parent Company's Name and Address

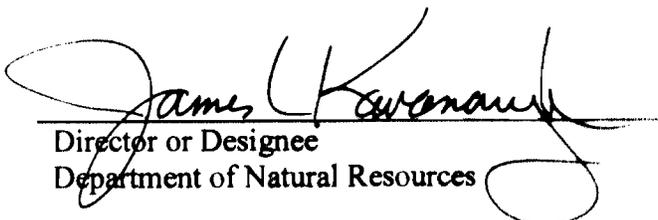
Exide Technologies
13000 Deerfield, Suite 2000
Alpharetta, GA 30004

Installation Description:

This installation is a secondary lead smelting plant. The facility receives batteries and breaks them apart to recycle the acid, plastic, and lead. The lead is recovered and smelted on site to form lead ingots. The plastic and acid are collected and shipped off site. The installation uses baghouses, an after-burner, a scrubber, and street sweepers to control sulfur, lead, volatile organic compounds and particulate matter emissions. This facility is a major source of VOC and SO_x emissions.

DEC 27 2010

Effective Date


Director or Designee
Department of Natural Resources

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

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

www.dnr.mo.gov

DEC 27 2010

CERTIFIED MAIL: 70082810000020167480
RETURN RECEIPT REQUESTED

Mr. Joseph Acker
Vice President, Recycling
Exide Technologies-Canon Hollow Plant
25102 Holt Rd 250
P.O. Box 156
Forest City, MO 64451

Re: Exide Technologies-Canon Hollow Plant, 087-0001
Permit Number: **OP2010-038A**

Dear Mr. Acker:

Enclosed with this letter is your revised Part 70 operating permit. This revision removes certain language that had modified provisions to 40 CFR Part 63, Subpart X as incorporated into the original permit at Permit Condition EU0010-001 through EU0140-001. In addition, the revision incorporates, as Attachment 6, a Standard Operating Procedures Manual for Fugitive Dust Sources (Fugitive Dust SOP), submitted by Exide Technologies on September 8, 2010. The purpose of these revisions is to clarify the responsibility incumbent upon Exide Technologies with respect to truck washing during periods when the ambient temperature is close to or below freezing, and to make clear that washing the trucks with water during periods of freezing weather is not required by 40 CFR Part 63, Subpart X. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

Mr. Joseph Acker
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If you have any questions or need additional information regarding this permit, please do not hesitate to contact Paul Kochan at the Kansas City Regional Office, 500 NE Colbern Rd., Lee's Summit, MO 63125, or by telephone at (816) 622-7000. You may also contact the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in black ink that reads "Michael Stansfield". The signature is written in a cursive style with a large, looping "S" at the end.

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

MJS:pkk

Enclosures

c: Mr. Eric Sturm, US EPA Region VII
Kansas City Regional Office
PAMS File: 2005-05-048

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

This installation is a secondary lead smelting plant. The facility receives batteries and breaks them apart to recycle the acid, plastic, and lead. The lead is recovered and smelted on site to form lead ingot. The plastic and acid are collected and shipped offsite. Heat is generated by burning coke in the furnace and natural gas in the kettles and space heaters. Gasoline and diesel power the plant mobile equipment. The installation uses an after-burner, baghouses, a scrubber, and street sweepers to control sulfur, lead, volatile organic compounds and particulate matter emissions. This facility is a major source of VOC and SO_x emissions.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2009	13.48	79.76	6.33	70.75	3.47	0.04	0.005
2008	19.74	117.24	7.35	103.95	3.47	0.06	0.006
2007	16.73	123.55	6.38	87.44	3.06	0.01	0.00
2006	17.53	159.49	6.01	91.87	2.68	0.01	0.01
2005	16.3	192	5.41	83.1	2.39	0.048	0.005
2004	15.0	201	5.40	79.5	2.47	0.050	0.380
2003	15.1	327	5.40	79.8	2.46	0.260	0.140
2002	16.0	324	6.33	84.8	2.88	0.280	0.140
2001	19.7	251	6.47	41.8	2.60	0.180	4.00

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	2007 EI#	Emission Control(s)	Description
EU0010	EP001	afterburner, west side baghouse, scrubber	Blast Furnace
EU0020	EP002A	east side baghouse for process	Kettle #1
EU0030	EP002A	east side baghouse for process	Kettle #2
EU0040	EP002A	east side baghouse for process	Kettle #3
EU0050	EP002A	east side baghouse for process	Kettle #4
EU0060		east side baghouse	Blast Furnace Charge Hood
EU0070		west side baghouse	Lead Tap and Metal Well Transfer Trough
EU0080		west side baghouse	Slag Tap and Molds During Tapping
EU0090		waste stabilization baghouse, partial enclosure, paving	Slag and Sludge Stabilization Process
EU0100		pavement cleaning	Roadways
EU0110		pavement cleaning, partial enclosure	Battery Breaking Area
EU0120		pavement cleaning, partial enclosure	Furnace Area
EU0130		pavement cleaning, partial enclosure	Refining and Casting Area
EU0140		partial enclosure, vehicle wash, paving	Raw Materials Storage and Handling
EU0150		wastewater treatment lime silo baghouse	Wastewater Treatment System Lime Silo
EU0160		north & south waste stabilization cement silos' common baghouse	North Cement Silo
EU0170		north & south waste stabilization cement silos' common baghouse	South Cement Silo
EU0180		scrubber lime silo baghouse	Scrubber Lime Silo #1
EU0190		briquetter lime silo baghouse	Scrubber Lime Silo #2

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Afterburner (3 burners @ 3 mmBtu/hr)
Battery breaker Bagged Lime Hopper
Sludge Storage Bagged Lime Hopper
Cement Transfer to Stabilization Pug Mill
Special Waste Landfill
Slag Storage
Coke Hopper Screen
15,000 gallon Sulfuric Acid Storage Tank
1,000 gallon Used Oil Storage Tank
1,500 gallon Gasoline Storage Tank
6,000 gallon Diesel Storage Tank
Waste Water Treatment Plant
Natural Gas Space Heaters

DOCUMENTS INCORPORATED BY REFERENCE

The following documents have been incorporated by reference into this permit:

Construction Permit 0396-009, Project Number EX0870001005

Construction Permit 0396-009A, Project Number 2006-09-088

II. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

EU0010 Process Source		
Emission Unit #	Process	Description
EU0010	Blast Furnace	Lead Smelting heated by coke combustion.
EU0020-EU0080 Process Fugitive Sources		
Emission Unit		Description
EU0020	Kettle #1	Accumulation point to gather enough metal produced from the blast furnace to refine 100 tons of metallic lead. Heated by natural gas combustion.
EU0030	Kettle #2	Refines the metal to specifications using variable temperature. Heated by natural gas combustion.
EU0040	Kettle #3	Refines the metal to specifications using variable temperature. Heated by natural gas combustion.
EU0050	Kettle #4	Refines the metal to specifications using variable temperature. Heated by natural gas combustion.
EU0060	Blast Furnace Charge Hood	Captures fugitive dust from the top of the blast furnace where the feedstock coke and fluxes are added
EU0070	Lead Tap and Metal Well Transfer Trough	Tapping of lead occurs on a continuous basis through a reservoir from the bottom of the crucible. The molten metal is transferred to Kettle #1 by a trough.
EU0080	Slag Tap and Molds During Tapping	Tapping of slag that floats on top of the molten metal reservoir from the opposite end of the furnace and lead tapping into 1,500 pound molds for solidification
EU0090-EU0140 Fugitive Dust Sources		
Emission Unit		Description
EU0090	Slag and Sludge Stabilization Process	Manual breaking of the slag buttons result in two piles: one to be recycled into the furnace and one to be processed in the stabilization process as waste slag. The waste slag is crushed, screened, and conveyed to the pug mill where it is mixed with cement, lime sludge, a proprietary material and water.
EU0100	Roadways	Fugitive dust from roads within the secondary lead smelter processing area.
EU0110	Battery Breaking Area	Batteries are opened using two saws and the lead plates are separated from the plastic and sulfuric acid. The plastic is shredded in a hammermill and transferred to storage, and the acid is transferred to a storage tank. This area includes fugitive emissions from the saws as well as the fugitives from the handling and storage of the battery components prior to transfer to the furnace area.

EU0120	Furnace Area	Fugitive emissions in the immediate vicinity of the blast furnace and the doghouse (the doghouse is a room above the afterburner where fugitives from the top of the afterburner collect).
EU0130	Refining and Casting Area	Fugitive emissions in the immediate vicinity of the four refining kettles and fugitive emissions from the two casting machines and in the area around the casting machines.
EU0140	Raw Materials Storage and Handling	Furnace feed pile, mixing room, and dross bin.

Permit Condition EU0010-001 through EU0140-001

10 CSR 10-6.075

Maximum Achievable Control Technology Regulations

40 CFR Part 63 Subpart X

National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting

Emission Limitations:

1. Process Source

a) The installation shall not discharge or cause to be discharged into the atmosphere from any blast smelting furnace any gases that contain lead compounds in excess of 2.0 milligrams of lead per dry standard cubic meter (0.00087 grains of lead compounds per dry standard cubic foot).

[\[§63.543\(a\)\]](#)

b) The installation shall not discharge or cause to be discharged into the atmosphere from any blast furnace any gases that contain total hydrocarbons in excess of 360 parts per million by volume, expressed as propane corrected to 4 percent carbon dioxide. [\[§63.543\(d\)\]](#)

c) The lead limit applicable to blast furnace, charging process, fugitive emissions that are not combined process emissions prior to the point at which compliance with the total hydrocarbons are determined is 0.20 kilograms per hour. [\[§63.543\(j\)\]](#)

2. Process Fugitive Sources

a) Ventilation air from all enclosures hoods and total enclosures shall be conveyed to a control device.

b) Gases discharged to the atmosphere from these control devices shall not contain lead compounds in excess of 2.0 milligrams of lead per dry standard cubic meter (0.00087 grains per dry standard cubic foot). [\[§63.544\(c\)\]](#)

3. Fugitive Dust Sources

The installation shall not discharge or cause to be discharged into the atmosphere from any building or enclosure ventilation system any gases that contain lead compounds in excess of 2.0 milligrams of lead per dry standard cubic meter (0.00087 grains of lead per dry standard cubic foot). [\[§63.545\(e\)\]](#)

Monitoring:

1. Process Source

a) The installation must comply with the following continuous temperature monitoring requirements to demonstrate continuous compliance with the total hydrocarbon emission standards. [\[§63.548\(j\)\]](#)

- b) The installation shall install, calibrate, maintain, and continuously operate a device to monitor and record the temperature of the afterburner consistent with the requirements for continuous monitoring systems in 40 CFR Part 63 Subpart A, General Provisions. [\[§63.543\(j\)\(1\)\(i\)\]](#)
 - c) To remain in compliance with the standards for total hydrocarbons, the permittee must maintain an afterburner temperature such that the average temperature in any 3-hour period does not fall more than 28 °C (50 °F) below the average established §63.548(j)(1)(iii). An average temperature in any 3-hour period that falls more than 28 °C (50 °F) below the average established in §63.548(j)(1)(iii), shall constitute a violation of the applicable emission standard for total hydrocarbons under §63.543(c), (d), or (e). [\[§63.543\(j\)\(1\)\(iv\)\]](#)
 - d) If the owner or operator of a blast furnace combines the blast furnace charging process fugitive emissions with the blast furnace process emissions and discharges them to the atmosphere through a common emission point, then compliance with the applicable total hydrocarbon concentration limit under paragraph [\[§63.543\(c\)\]](#) shall be determined downstream from the point at the which the two emission streams are combined. [\[§63.543\(f\)\]](#)
2. Process Fugitive Sources
- a) The installation shall control the process fugitive emission sources listed in a) through c) below in accordance with the equipment and operational standards presented in §63.544(b) and (c). [\[§63.544\(a\)\]](#)
 - i) Smelting furnace lead taps and molds during tapping;
 - ii) Smelting furnace slag taps and molds during tapping;
 - iii) Refining kettles;
 - b) Process fugitive emission sources shall be equipped with an enclosure hood meeting the requirements of §63.544(b)(1) or (2), or be located in a total enclosure subject to general ventilation that maintains the building at a lower than ambient pressure to ensure in-draft through any doorway opening. [\[§63.544\(b\)\]](#)
 - i) All process fugitive enclosure hoods except those specified for refining kettles (EU0020 – EU0050) shall be ventilated to maintain a face velocity of at least 90 meters per minute (300 feet per minute) at all hood openings. [\[§63.544\(b\)\(1\)\]](#)
 - ii) Process fugitive enclosure hoods required for refining kettles in §63.544(a) shall be ventilated to maintain a face velocity of at least 75 meters per minute (250 feet per minute). [\[§63.544\(b\)\(2\)\]](#)
 - c) Ventilation air from all enclosures hoods and total enclosures shall be conveyed to a control device. [\[§63.544\(c\)\]](#)
3. Fugitive Dust Sources
- a) The installation shall prepare and at all times operate according to a standard operating procedures manual that describes in detail the measures that will be put in place to control fugitive dust emission sources within the following areas of the secondary lead smelter: [\[§63.545\(a\)\]](#)
 - i) Plant roadways;
 - ii) Battery breaking area;
 - iii) Furnace area;
 - iv) Refining and casting area; and
 - v) Materials storage and handling area.
 - b) The controls specified in the standard operating procedures manual shall at a minimum include the following: [\[§63.545\(c\)\]](#)

- i) Plant roadways – paving of all areas subject to vehicle traffic and pavement cleaning twice per day of those areas, except on days when natural precipitation makes cleaning unnecessary or when sand or a similar material has been spread on plant roadways to provide traction on ice or snow.
 - ii) Battery breaking area – partial enclosure of storage piles, wet suppression applied to storage piles with sufficient frequency and quantity to prevent the formation of dust, and pavement cleaning twice per day; or total enclosure of the battery breaking area.
 - iii) Furnace area – partial enclosure and pavement cleaning twice per day; or total enclosure and ventilation of the enclosure to a control device.
 - iv) Refining and casting area – partial enclosure and pavement cleaning twice per day; or total enclosure and ventilation of the enclosure to a control device.
 - v) Materials storage and handling area – partial enclosure of storage piles, wet suppression applied to storage piles with sufficient frequency and quantity to prevent the formation of dust, vehicle wash at each exit from the area, and paving of the area; or total enclosure of the area and ventilation of the enclosure to a control device and a vehicle wash at each exit.
 - c) The standard operating procedures manual shall require that daily records be maintained of all wet suppression, pavement cleaning, and vehicle washing activities performed to control fugitive dust emissions. [\[§63.545\(d\)\]](#)
4. All Sources
- a) The permittee shall prepare, and at all times operate according to, a standard operating procedures manual that describes in detail procedures for inspection, maintenance, and bag leak detection and corrective action plans for all baghouses (fabric filters) that are used to control process, process fugitive, or fugitive dust emissions from any source subject to the lead emission standards in §63.543, §63.544, and §63.545, including those used to control emissions from building ventilation. [\[§63.548\(a\)\]](#)
 - b) The procedures specified in the standard operating procedures manual for inspections and routine maintenance shall, at a minimum, include the following: [\[§63.548\(c\)\]](#)
 - i) Daily monitoring of pressure drop across each baghouse cell.
 - ii) Weekly confirmation that dust is being removed from hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms.
 - iii) An appropriate methodology for monitoring cleaning cycles to ensure proper operation.
 - iv) Monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means.
 - v) Monthly check of bag tension on reverse air baghouses.
 - vi) Quarterly confirmation of the physical integrity of the baghouse through visual inspection of the baghouse interior for air leaks.
 - vii) Quarterly inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.
 - viii) Continuous operation of a bag leak detection system.
 - c) The procedures specified in the standard operating procedures manual for maintenance shall, at a minimum, include a preventative maintenance schedule that is consistent with the baghouse manufacturer's instructions for routine and long-term maintenance. [\[§63.548\(d\)\]](#)
 - d) The bag leak detection system required by §63.548(c)(9), shall meet the following specifications and requirements: [\[§63.548\(e\)\]](#)
 - i) The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligram per actual cubic meter (0.0044 grains per actual cubic foot) or less.

- ii) The bag leak detection system sensor must provide output of relative particulate matter loadings.
 - iii) The bag leak detection system must be equipped with an alarm system that will alarm when an increase in relative particulate loading is detected over a preset level.
 - iv) The bag leak detection system shall be installed and operated in a manner consistent with available written guidance from the U.S. Environmental Protection Agency or, in the absence of such written guidance, the manufacturer's written specifications and recommendations for installation, operation, and adjustment of the system.
 - v) The initial adjustment of the system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time.
 - vi) Following initial adjustment, the permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time, except as detailed in the approved SOP required under §63.548(a). In no event shall the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365 day period unless such adjustment follows a complete baghouse inspection which demonstrates the baghouse is in good operating condition.
 - vii) For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detector must be installed downstream of the baghouse and upstream of any wet acid gas scrubber.
 - viii) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- e) The standard operating procedures manual required by §63.548(a) shall include a corrective action plan that specifies the procedures to be followed in the case of a bag leak detection system alarm. The corrective action plan shall include, at a minimum, the procedures used to determine and record the time and cause of the alarm as well as the corrective actions taken to correct the control device malfunction or minimize emissions as specified in §63.548(f)(1) and (2).
- [\[§63.548\(f\)\]](#)
- i) The procedures used to determine the cause of the alarm must be initiated within 30 minutes of the alarm. [\[§63.548\(f\)\(1\)\]](#)
 - ii) The cause of the alarm must be alleviated by taking the necessary corrective action(s) which may include, but not be limited to the following: [\[§63.548\(f\)\(2\)\]](#)
 - iii) Inspecting the baghouse for air leaks, torn or broken filter elements, or any other malfunction that may cause an increase in emissions.
 - iv) Sealing off defective bags or filter media.
 - v) Replacing defective bags or filter media, or otherwise repairing the control device.
 - vi) Sealing off a defective baghouse compartment.
 - vii) Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.
 - viii) Shutting down the process producing the particulate emissions.

Testing:

Process and Process Fugitive Sources

1. Except as provided in §63.543(i) and §63.544(f), the installation shall conduct a compliance test for lead compounds on an annual basis (no later than twelve (12) calendar months following the previous compliance test). [\[§63.543\(h\) and §63.544\(e\)\]](#)

2. If a compliance test demonstrates a source emitted lead compounds at 1.0 milligram of lead per dry standard cubic meter (0.00044 grains of lead compounds per dry standard cubic foot) or less during the time of the compliance test, the installation shall be allowed up to 24 calendar months from the previous compliance test to conduct the next annual compliance test for lead compounds. [[§63.543\(i\)](#) and [§63.544\(f\)](#)]

Record keeping:

1. The installation shall comply with all of the record keeping requirements under §63.10 of the General Provisions.
2. In addition, the permittee shall maintain the following records: [[§63.550\(a\)](#)]
 - a) An identification of the date and time of all bag leak detection system alarms, their cause, and an explanation of the corrective actions taken.
 - b) The output from the continuous temperature monitor, an identification of periods when the 3-hour average temperature fell below the minimum established under §63.548(j)(1), and an explanation of the corrective actions taken.
 - c) Any record keeping required as part of the practices described in the standard operating procedures manual required under §63.545(a) for the control of fugitive dust emissions.
 - d) Any record keeping required as part of the practices described in the standard operating procedures manual for baghouses required under §63.548(a).
3. All applicable record keeping forms are included in the Standard Operating Procedures Manual. The Standard Operating Procedures Manual can be found as Attachment 6.
4. All records shall be maintained at the facility for a minimum of five (5) years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

1. The installation shall comply with all of the reporting requirements under §63.10 of the General Provisions. The submittal of reports shall be no less frequent than specified under §63.10(e)(3) of the General Provisions. Once a source reports a violation of the standard or excess emissions, the source shall follow the reporting format required under §63.10(e)(3) until a request to reduce reporting frequency is approved. [[§63.550\(b\)](#)]
2. In addition to the information required under §63.10 of the General Provisions, reports required under §63.550(b) shall include the following information: [[§63.550\(c\)](#)]
 - a) Records of all alarms from the bag leak detection system specified in §63.548(e). [[§63.550\(c\)\(1\)](#)]
 - b) A description of the procedures taken following each bag leak detection system alarm pursuant to §63.548(f)(1) and (2). [[§63.550\(c\)\(2\)](#)]
 - c) A record of the temperature monitor output, in 3-hour block averages, for those periods when the temperature monitored pursuant to §63.548(j)(1) fell below the level established in §63.548(j)(1). [[§63.550\(c\)\(3\)\(i\)](#)]
 - d) A summary of the records maintained as part of the practices described in the standard operating procedures manual for baghouses required under §63.548(a) including an explanation of the periods when the procedures were not followed and the corrective actions taken. [[§63.550\(c\)\(4\)](#)]
 - e) A summary of the fugitive dust control measures performed during the required reporting period, including an explanation of the periods when the procedures outlined in the standard operating procedures manual pursuant to §63.545(a) were not followed and the corrective actions taken. The reports shall not contain copies of the daily records required to demonstrate compliance with the requirements of the standard operating procedures manuals required under §63.545(a) and §63.548(a). [[§63.550\(c\)\(6\)](#)]

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

Permit Condition EU0010-002 through EU0050-002

10 CSR 10-6.070

New Source Performance Regulations

40 CFR Part 60 Subpart L

Standards for Performance for Secondary Lead Smelters

Emission Limitations:

The installation shall not discharge or cause the discharge into the atmosphere from any blast furnace or pot furnace (holding or refining kettle) any gases which:

1. Exhibit 10 percent opacity or greater. [[§60.122\(b\)](#)]
2. Contain particulate matter in excess of 50 mg/dscm (0.022 gr/dscf). [[§60.122\(a\)\(1\)](#)]

Monitoring:

1. The permittee shall conduct a visual emission observation on this emission unit once a month using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions were observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. Should a violation be observed, monitoring frequency will progress in the following manner:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after the date of the initial violation. Should no violation of this regulation be observed during this period, then,
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period, then,
 - c) Observations must be made once per month.
3. The permittee shall have an annual Certified Method 9 Test performed on the emission unit.

Record keeping:

1. The permittee shall retain the most recent particulate stack test showing compliance with the rule.
2. The permittee shall maintain all opacity observation results (see Attachment 3 and 4), noting:
 - a) Whether any emissions were visible from the emission units,
 - b) Whether the visible emissions were normal for the process.
3. All Certified Method 9 Opacity Test results.
4. All records shall be maintained at the facility for a minimum of five (5) years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

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

Permit Condition EU0010-003
10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds

Emission Limitation:

1. Emissions from this installation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
2. Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three-hour time period.
3. This installation shall not cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [[10 CSR 10-6.260\(3\)\(B\)](#) & [10 CSR 10-6.010 Ambient Air Quality Standards](#)]

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m ³))	Annual arithmetic mean
	0.14 ppm (365 µg/m ³)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days

Monitoring:

1. The permittee shall install, calibrate, operate and maintain a continuous emission monitoring (CEM) system for measuring sulfur oxides.
2. The continuous emission monitoring system shall be certified by the permittee in accordance with 40 CFR Part 60 Appendix B. Performance Specification 2 and Section 60.13 as is pertinent to SO₂ continuous monitors as adopted by reference in 10 CSR 10-6.070.
3. The span of the SO₂ continuous monitor shall be set at an SO₂ concentration of one-fifth percent (0.02%) by volume.

4. For the purpose of the SO₂ continuous monitor performance evaluation, the reference method referred to under the Field Test for Accuracy in Performance Specification 2 shall be Reference Method 6, 10 CSR 10-6.030(6). The minimum sampling time is twenty (20) minutes and the minimum volume is 0.02 dscm for each sample. Samples are taken at sixty (60) minute intervals and each sample represents a one (1)-hour average.

Record keeping:

1. The permittee shall document all information reported in the quarterly reports,
2. The permittee shall document all maintenance, down time, performance test results and calibration checks done on the CEM system.
3. All records shall be maintained at the facility for a minimum of five (5) years and shall be made available to Department personnel upon request.

Reporting:

1. The permittee shall submit quarterly excess emission reports within 30 days following the end of each calendar quarter to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. The report shall include, but not be limited to, the following information:
 - a) The magnitude in parts per million of each two (2)-hour arithmetic average of SO₂ emissions greater than 500 ppm by volume,
 - b) Identify each period during which the continuous monitoring system was inoperative, except for zero and span checks and the nature of repairs and adjustments performed to make the system operative,
 - c) Each report shall contain a statement that no excess emissions occurred during the quarter except as reported or during periods when the continuous monitoring system was inoperative. Data reduction and conversion procedures shall conform to the provisions of 40 CFR 60.13(h) and 60.45(e) and (f).
 - d) When no excess emissions have occurred during the quarter and the monitoring system had no period of downtime or did not require repairs or adjustments, an excess emission report shall be filed stating such information.
2. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which causes an exceedance of this regulation. Any deviations from this permit condition shall be reported in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0150-EU0190 Lime & Cement Silos		
Emission Unit		Description
EU0150	Wastewater Treatment System Lime Silo	Pneumatic loading of the lime silo used at the wastewater treatment plant
EU0160	North Cement Silo	Pneumatic loading of the cement silo used in the slag and sludge stabilization process
EU0170	South Cement Silo	Pneumatic loading of the cement silo used in the slag and sludge stabilization process
EU0180	Scrubber Lime Silo #1	Pneumatic loading of the lime silo used to supply the scrubber
EU0190	Scrubber Lime Silo #2	Pneumatic loading of the lime silo used to supply the scrubber

Permit Condition EU0150-001 through EU0190-001

10 CSR 10-6.060

Construction Permits Required

Construction Permit #0396-009A

Equipment Specification:

1. The permittee shall control emissions from the silos using baghouses. The baghouse for each associated silo must be in use at all times when material is being transferred into the silo, and shall be operated and maintained in accordance with the manufacturer's specifications.
2. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring:

Visible emissions will be used as an indicator of the proper operation of the control device. The permittee shall monitor the baghouses for visible emissions during each truck unloading. Corrective action will be taken if significant visible emissions occur.

Recordkeeping:

The permittee shall maintain an operating and maintenance log for the baghouses (use Attachment 5 or an equivalent log or logs as developed by the Permittee) which shall include the following:

1. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
2. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

All records shall be made available to the Department of Natural Resources' personnel upon request. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by permit condition.

Permit Condition EU0150-002 through EU0190-002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. The installation shall not cause or permit to be discharged into the atmosphere from these emission units, any visible emissions greater than twenty percent (20%) opacity.
2. The installation may discharge into the atmosphere from any single source of emissions for period not aggregating more than one six (6) minute period in any sixty (60) minutes, any visible emissions with an opacity up to sixty percent (60%).

Compliance:

1. Visible emissions exceeding the above limitations are in violation of this rule unless the Director determines that the excess emissions do not warrant enforcement action based on data submitted under 10 CSR 10-6.050 Start-Up, Shutdown and Malfunction Conditions.
2. Any exceedance of the above emission limitations solely because of the presence of uncombined water shall not be a violation of this rule.

Monitoring:

1. The permittee shall conduct a visual emission observation on this emission unit once every 30 days during material transfer using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when material is being transferred into the silos and when the weather conditions allow. If no significant emissions were observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the facility representative would then conduct a Method 9 observation.
2. Should a violation be observed, monitoring frequency will progress in the following manner:
 - a) Observations shall be conducted for a minimum of four (4) consecutive material transfers into each silo after permit issuance. Should no violation of this regulation be observed during this period, then,
 - b) Observations must be made on each silo once every 30 days. If a violation is noted, monitoring reverts to four consecutive material transfers for that silo and will progress in an identical manner from the initial monitoring frequency.
3. The permittee shall conduct an annual opacity measurement on the emission units by U.S. EPA Test Method 9 with a certified Method 9 observer.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachment 3 & 4), noting:
 - a) Whether any emissions were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition.

4. These records shall be maintained at the facility for five (5) years and made available to Department of Natural Resources' personnel upon request.

Reporting:

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

III. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.
 - (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 owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Exide Technologies-Canon Hollow Plant may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Exide Technologies-Canon Hollow Plant fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170

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

Emission Limitation:

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

Monitoring:

- 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 conduct monthly observations unless a violation is noted, which will require the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after the violation.
 - b) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) 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.
 - c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency in item 2a.

Recordkeeping:

The permittee shall document all readings on Attachment 2, or its equivalent, noting the following:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.090 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.

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee shall conduct monthly observations unless a violation is noted, which will require the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit the violation.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) 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.
 - c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency in item 2a.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment 2 (or its equivalent), noting:

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

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 Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

- b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

IV. General Permit Requirements

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

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

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

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

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

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

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

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

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

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

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

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

10 CSR 10-6.065(6)(C)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, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

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

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

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

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

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

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

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

emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

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

10 CSR 10-6.020(2)(R)11 Responsible Official

The application utilized in the preparation of this permit was signed by Phil Milazzo, Vice President Recycling. On July 26, 2009, the Air Pollution Control Program was informed that Joseph Acker, Vice President Recycling is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

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

V. Attachments

Attachments follow.

Attachment 1

Table showing silo compliance with regulation 10 CSR 10-6.400.

Emission Unit	Maximum Hourly Design Rate (tons/hr)	Particulate Matter		Calculated Emission Limit ** (lbs/hr)	Exhaust Flow Rate (scfm)	Uncontrolled Grain	Controlled Grain	Emission Limit (gr/scf)
		Emission Factor* (lbs/ton)	Potential Emissions (lbs/hr)			Loading Potential Emissions (gr/scf)	Loading Potential Emissions*** (gr/scf)	
EU0150	16.0	0.72	11.5	26.3	549.72	2.44	0.02	0.30
EU0160	16.0	0.72	11.5	26.3	549.72	2.44	0.02	0.30
EU0170	16.0	0.72	11.5	26.3	549.72	2.44	0.02	0.30
EU0180	16.0	0.72	11.5	26.3	549.72	2.44	0.02	0.30
EU0190	16.0	0.72	11.5	26.3	549.72	2.44	0.02	0.30

*From AP42 Table 11.12-2 Total PM Cement unloading to elevated storage silo (pneumatic)

**As calculated from the equation provided in 10 CSR 10-6.400

***Baghouse control efficiency is assumed 99%

Attachment 4

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 6

**Standard Operating Procedures Manual
For
Fugitive Dust Sources**

**Prepared For
Exide Technologies
Canon Hollow Smelter
Revised September 2010**

I. Plant Roadways and Parking Areas

All plant roadways and parking areas in the Canon Hollow Recycling Center are asphalt or concrete paved and bermed to control stormwater runoff. The roadways and parking area are identified as being potential sources of fugitive emissions due to the volume of vehicular traffic both shipping and receiving materials and supplies to the Recycling Center. Particulate matter, which may contain lead, that is incidentally deposited on roadways may be reintrained into the atmosphere by vehicular traffic.

A. Control Measures

1. Fugitive dust emissions from plant roadways and parking area are controlled by means of mechanical sweeping. To reduce fugitive dust a GMC W550-Schwarze A400 Road Sweeper and/or an Armadillo Road Sweeper is utilized in accordance with the following schedule:

All plant roadways used by mobile equipment with the potential to track and deposit particulate matter which may contain lead are swept at least twice a day between 7:00 am to 7:00 pm.

(Attachment A) shows the location of the areas in the smelter that are cleaned by the sweeper.

2. A 5-mile per hour speed limit is posted and enforced on all plant roadways. Speed bumps are also installed on the main roadway.
3. The road sweepers are operated and maintained in accordance with manufacturer's specifications. A daily Maintenance and Operation Log is completed by the operator on each shift and is maintained electronically at the facility.

These procedures are followed on a daily basis, except on days when precipitation, in the form of rain, snow or ice, prevents the use of the road sweeper. Documentation of the daily sweeping is recorded on the Sweeper Operational Log (see Attachment B).

II Battery Breaking Area

Spent lead-acid batteries received at the facility are processed in a totally enclosed battery breaker unit. The batteries are cut and all materials are separated. The entire process is wet once the batteries are cut and products are wet. The following fugitive emission control measures are utilized at the Battery Breaking Area.

A. Control Measures

1. Lead material exiting the battery breaker is placed directly into the Containment Building for 24 hours before being moved into one of the dry storage areas, all containment buildings are designed and operated in accordance with the requirements outlined in 40 CFR 265.1101
2. The battery breaking area itself is totally enclosed.

III. Furnace Area

There is one blast furnace located at the Canon Hollow Smelter which processes lead bearing materials for lead reclamation. Along with the furnace, other potential sources of fugitive emissions are the furnace charging mechanism, metal well trough and tapping areas. The following fugitive emission control measures are utilized for these sources.

A. Control Measures

1. The furnace charging mechanism is located adjacent to the Raw Material Storage and Handling Building and is totally enclosed within the same building structure, which meets the requirements outlined in 40 CFR 265.1101. Potential process fugitive emissions from the charging operation are controlled by an enclosed hood ventilated to a control device operated and maintained in accordance with the facility's standard operating procedures manual for baghouses. The hood is ventilated to maintain a face velocity in accordance with the requirements of 40 CFR 63.544(b). Face velocity readings shall be measured and recorded using the methods described in 40 CFR 63.547 on a quarterly basis. The face velocity readings will be recorded on the Mechanical Ventilation Measurement Log (Attachment C).
2. The furnace area is totally enclosed. Floors in the furnace area are cleaned (washed or swept) at least twice a day. Daily records of cleaning activities are maintained on the Blast Furnace Daily Shift Reports (Attachment D)
3. Potential process fugitive emissions from lead and slag tapping are controlled by enclosed hoods ventilated to a control device operated and maintained in accordance with the facility's standard operating procedures manual for baghouses. The hoods are ventilated to maintain a face velocity in accordance

with the requirements of 40 CFR 63.544(b). Face velocity readings shall be measured and recorded using the methods described in 40 CFR 63.547 on a quarterly basis. The face velocity readings will be recorded on the Mechanical Ventilation Measurements Log (Attachment C).

IV. Refining and Casting Area

Refining kettles used in the lead refining process receive molten lead directly from the furnace holding kettle. Reagents are added to the lead to make particular lead alloys. Potential fugitive emissions are controlled by the following measures:

A. Control Measures

1. The lead refining area is located and operated in conjunction with the furnace. Potential fugitive emissions from refining operations are controlled by enclosed hoods ventilated to a control device operated and maintained by the facility's standard operating procedures manual for baghouses. The hoods are ventilated to maintain a face velocity in accordance with the requirements 40 CFR 63.544(b). Face velocity readings shall be measured and recorded using the methods described in 40 CFR 63.547 on a quarterly basis. The face velocity readings will be recorded on the Mechanical Ventilation Measurements Log (Attachment C)
2. The refining area is totally enclosed. Floors and other surfaces in the refining area are cleaned at least twice a day. Daily records of cleaning activities are maintained on the Blast Furnace Daily Shift Reports (Attachment D)

V. Material Storage and Handling

Lead bearing materials are staged in the Raw Materials Storage and Handling Buildings prior to being processed through the smelting furnace. Potential fugitive emissions are controlled by the following measures:

A. Control Measures

1. The raw materials storage and handling buildings are totally enclosed structures designed and operated as containment buildings in accordance with the requirements of 40 CFR 265.1101 (a) and (c) and MDNR Hazardous Waste Permit MODO30712822A.
2. All vehicles exiting the containment building must pass through a vehicle wash prior to exiting the building.
3. In the event that the vehicle wash is inoperative or forecasted/actual temperatures are below freezing (32° F) vehicles shall be manually dry brushed to remove visible lead bearing materials prior to exiting the building. The dry brushing shall be done in such a way as to minimize airborne material and will be conducted over the vehicle wash station to capture any material in the rinsate collection system. The outside building doors will be closed during the dry brushing and

remain closed until the vehicle is ready to exit the building. Employees engaged in dry brushing will wear respirators and all other appropriate personnel protective equipment (PPE).

4. Daily records of the vehicle washing station are maintained on the RCRA Containment Building Hazardous Waste Inspection Log (Attachment E)
5. A log of actual and forecast highs and low temperatures will be maintained in the environmental office from October 1 to April 1.
6. The mix room portion of the Containment Building is ventilated to the eastside baghouse.

VI. Slag and Sludge Fixing Process Area

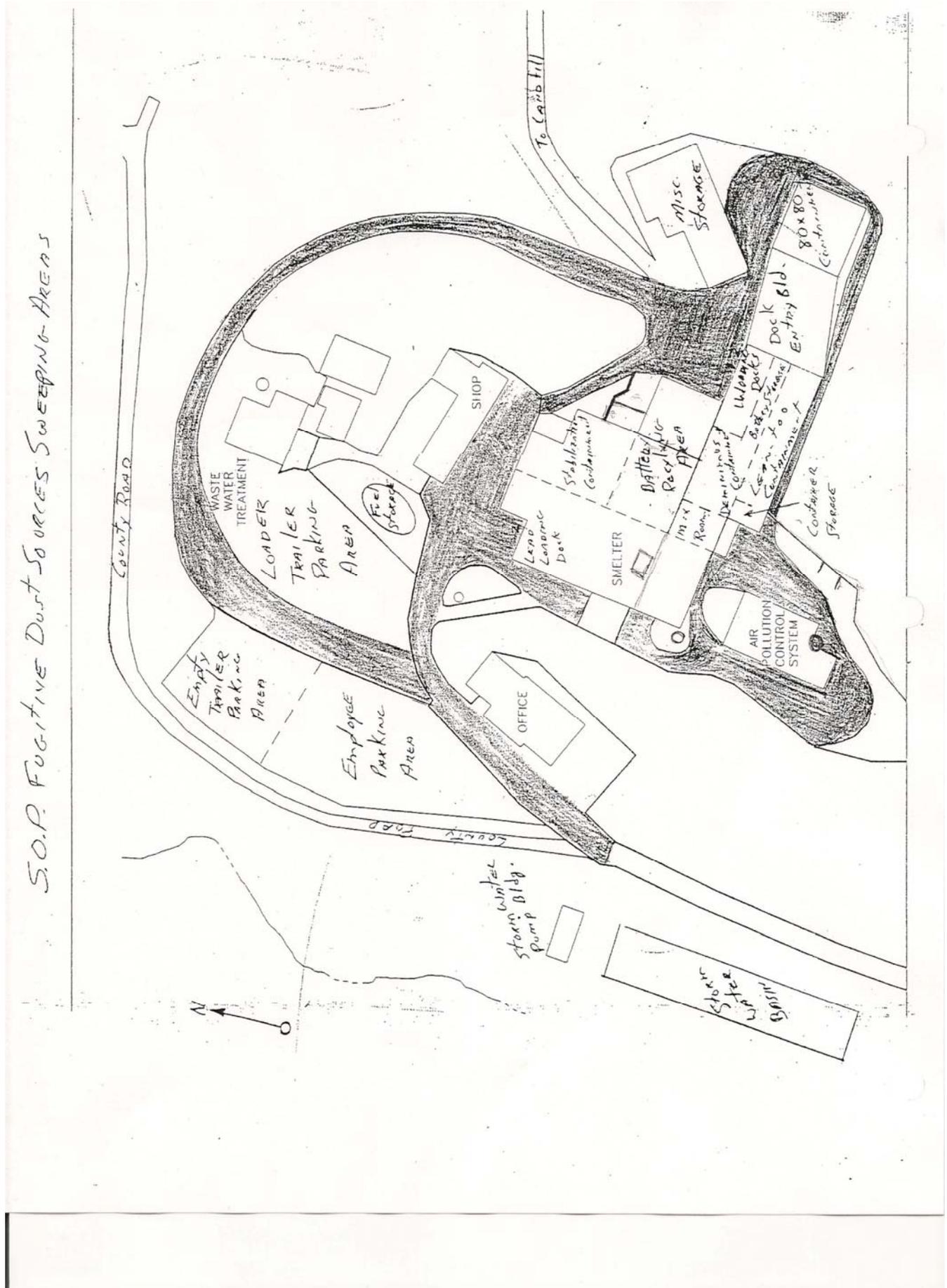
Blast furnace slag is reduced to a usable size in a rock crusher then mixed with water treatment plant sludge and SO₂ scrubber sludge in a pug mill mixer to fix the materials for disposal. Potential fugitive emissions are controlled by the following measures:

A. Control Measures

1. The slag and sludge fixing process area is totally enclosed and is regulated under MODO30712822A.
2. A baghouse controls fugitive dust from the slag crusher and ancillary equipment.
3. Records of operation of the Slag Crusher baghouse will be recorded on the Slag Crusher Baghouse Process Control Log (Attachment G)

Attachment A

8/27/10



Attachment B

Inspector _____

Inspector _____

Sweeper Operation

“A” Titled: S.O.P. Fugitive Dust Sources Sweeping Area.

* All functions except the blast furnace operation are shutdown on Sundays resulting in extremely minimal traffic (mobile equipment servicing), therefore no sweeping is performed

Month of: _____

Date	Reason	Inspector
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
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21		
22		
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24		
25		
26		
27		
28		
29		
30		
31		

Note: Sweeping is performed at least twice daily on roadways indicated in attachment. Sweeping is performed continuously, daily, to include two or more times around

Attachment C

Mechanical Ventilation Measurements

Exide Corporation

Canon Hollow Plant

Date:

Equip. Used: Velocicalc Model #8355

Readings Taken By:

Furnace / Metal Trough					
Point #1		Point #5			
Point #2		Point #6		Slag Tap	
Point #3		Point #7		<i>Avg. Vel.</i>	
Point #4		Point #8		Metal Well	
	<i>Avg. Vel.</i>			<i>Avg. Vel.</i>	

Kettle Floor				
	<i>Avg. Velocity</i>			<i>Avg. Velocity</i>
Kettle #1			Dross Pot	
Kettle #2			Dross Pot	
Kettle #3			Dross Pot	
Kettle #4			Dross Pot	

Furnace Charge Hood							
Point #1		#4		#7		#10	
Point #2		#5		#8		#11	
Point #3		#6		#9		#12	
					<i>Avg. Velocity</i>		

Attachment D

<u>Procedure</u> Blast Furnace Production Report	<u>ISO Element</u> 8.2.3 - Monitoring and Measurement of Processes	Document Reference Number CH-8.2-BF Production Report	Version 0 Version Date: 05/29/2008
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SHIFT: C

DATE August 16, 2010	SHIFT SUPERVISOR McClanahan, Elliott	Run SOFT
CHARGE OPERATOR	EMPLOYEE Turpin, Bill	HOURS 12
FLUX OPERATOR		
BLAST FURNACE OPERATOR	Stroud, Wayne	12
SLAGPOT/ASST FURNACE OPERATOR		
KETTLE FLOOR OPERATOR	Surman, Guy	12.25
BAGHOUSE	McCarty, Johnny	12
MISC	simpson, steven	12
MISC		
ABSENTEES		
ABSENTEES	Wilmes, Mike	
TOTALS	6	60.25

BLAST FURNACE CHARGE NUMBER# 102
KETTLE #1:
#1 Tons out start 24
#2 Tons out end 22
#3 Pumped ⁷⁰ tons to kettle ²
#4 Cast rough tons, Lot#
#5 Rough drossed ⁵ hoppers(s)
TONS PRODUCED
Dirty: 78
Clean: 72

Number of Charges 45 Number Of Slag Pots 20 Rough Cast Inventory 144

FURNACE CONDITIONS

TUYERES
EAST SLOTS 4 / 3 B / O 1 / D
WEST SLOTS 2 / 1 B / O 1 / 3 D

REAGENT INVENTORY

S b ///////////////	S e ///////////////
S n ///////////////	A s ///////////////

TOP TEMPERATURE - BEGINNING OF SHIFT: 800

DOWNTIME - CAUSE AND CORRECTIVE ACTION:

K- 4 won't light. Refer to Q.C.P.C... Put 20 buttons(40 ton) in K- 2... Low lime at 3:30am... Cleaned on the kettle floor. Cleaned out dross bin. Cleaned draft syst.at 12:55am.and 4:30am...

KETTLES			
STARTING TREATMENT	TEMPERATURE	ENDING TREATMENT	TEMPERATURE
KETTLE #2: FILL-BLKS	0	DE- SN	810 @ 6 AM.
KETTLE #3: DE-NI	770	SB	1205 @ 6 AM
KETTLE #4: SB	1175	COOL DOWN	745 @ 6 AM.

HOUSE KEEPING

Kettle Floor	Baghouse	Scrubber	Flues	Sight Glasses
Slag Tap Area* Yes	Floors* No	Floor* Yes	Afterburner Yes	Horizontal Tank Yes
Metal Wells Area* Yes	Bins MT	Filter Press MT	Elbow Yes	Upper Jackets Yes
Floors* No	Office Building	Slurry Level 1FT	Water Cooled Flue Yes	Lower Jackets Yes
Reagent Room* Yes		Recycle Level 2FT	Clean Out Box Yes	Flue Pipe Yes
Slag Dump* Yes	Indigenous Waste No			
Dross Bin No	Removed			
Kettle Rims & Hoods No				

Kettles Cast

Kettle Number	Lead Alloy	# of Blks

*WET Sweeping and Washing

Attachment E

**Exide Technologies Cannon Hollow Recycling Center
 Hazardous Waste Inspection – Containment Building Unit and Roadways**

Date															
Inspector															
Status	Sat.	Unsat.													
Battery Storage Area – Spent Battery Trailer Parking Area															
Daily															
- Condition of Pavement															
- Signs of leakage from trailer(s)															
- Remedial action implemented															
Comments:															
Deck Entry Building (DEB)															
Daily															
- No visible air emissions															
- No accumulation of liquids															
- Prevention of tracking of waste															
- Decon wash station operable															
Weekly															
- Condition of floor of storage area															
- No stacking of waste (adjacent to wall) Higher than concrete wall															
Comments															
80' x 80' Storage Area															
Daily															
- No visible air emissions															
- No accumulation of liquids															
- Prevention of tracking of waste															
Weekly															
- Condition of floor of storage area															
- No stacking of waste (adjacent to wall) Higher than concrete wall															
Comments															

Attachment F

Inspector _____

Inspector _____

Containment Building Fugitive Dust Log

Document Any Containment Building Areas Wetted to Control Dust Emissions

Month

Year

Deb Room = NO. 1

Slag Floor = NO. 2

Day	Building(s)	Comments	Inspector
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
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22			
23			
24			
25			
26			
27			
28			
29			
30			
31			

Attachment G

SLAG CRUSHER BAGHOUSE DAILY/MONTHLY PROCESS CONTROL

DAILY

DAY	BLOWER AMPS	DIFFERENTIAL	CLEANING BLOWER (OK)	DUST REMOVED	INITIALS
Sunday					
Monday					
Tuesday					
Wednesday					
Thursday					
Friday					
Saturday					

COMMENTS: _____

MONTHLY (This section to be completed the 1st week of each Month)

Baghouse, Ducts & Hoods External Integrity _____
Baghouse Interior Integrity _____
Bags Secure _____
Fan wear, buildup & vibration _____

SIGNATURE: _____

COMMENTS: _____

STATEMENT OF BASIS

Permit Amendment

This revision to the original permit removes certain language that had modified provisions to 40 CFR Part 63, Subpart X as incorporated into Permit Condition EU0010-001 through EU0140-001. In addition, this revision incorporates, as Attachment 6, a Standard Operating Procedures Manual for Fugitive Dust Sources (Fugitive Dust SOP), submitted by Exide Technologies on September 8, 2010. The purpose of these revisions is to clarify the responsibility incumbent upon Exide Technologies with respect to truck washing during periods when the ambient temperature is close to or below freezing, and to make clear that washing the trucks with water during periods of freezing weather is not required by 40 CFR Part 63, Subpart X.

Permit Reference Documents

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

1. Part 70 Operating Permit Application, received May 10, 2005;
2. 2007 Emissions Inventory Questionnaire, received May 29, 2008;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

Included with and incorporated into this Operating Permit at Attachment 6 is the Standard Operating Procedures Manual for Fugitive Dust Sources (Fugitive Dust SOP), submitted by Exide Technologies on September 8, 2010. Exide Technologies submitted the Fugitive Dust SOP to satisfy 40 C.F.R. Part 63, Subpart X. Exide's Fugitive Dust SOP incorporates in part a method of vehicle wash that will be used during periods of freezing conditions, with a water wash system being used at other times. These methods satisfy the vehicle wash requirements of § 63.545(c)(5). The Department has reviewed and approved the Fugitive Dust SOP as incorporated herein.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

This rule does not apply to indirect heating sources subject to 10 CSR 10-6.070, New Source Performance Regulations. Kettles #1 through #4 (EU0020 - EU0050) are not subject to this rule because they are subject to 40 CFR Part 60, Subpart L.

10 CSR 10-6.120, *Restriction of Emissions of Lead from Specific Lead Smelter-Refinery Installations*

This rule does not apply because it is only applicable to existing lead smelter facilities and not where New Source Performance Standards apply. This installation was constructed in the outstate area after

February 24, 1971, and therefore is considered a new installation in accordance with the rule. In addition, the New Source Performance Standard for Performance of Secondary Lead Smelters, Subpart L applies.

10 CSR 10-6.310, *Restriction of Emissions from Municipal Solid Waste Landfills*

The installation's landfill is a special waste landfill and does not contain municipal solid waste. The facility's landfill is regulated by the Missouri Department of Natural Resources Hazardous Waste Program and the Missouri Department of Natural Resources Solid Waste Program regulations. Therefore, this rule does not apply.

Construction Permit Revisions

Special Condition 2 of Construction Permit 0396-009 states that records are to be kept on site for the previous 24 months. This requirement has been changed in the Title V permit to five years in order to meet the requirements in paragraph (6)(C)1.C.(II)(b)I of 10 CSR 10-6.065, *Operating Permits*.

Special Conditions 1 and 2 of Construction Permit 0396-009 required that the silo baghouses be equipped with pressure gauges, that the baghouses were to be used at all times when lead processing was in effect and that the baghouse pressure drops were to be monitored and recorded at least every 24 hours. These conditions were not included in the operating permit because the construction permit was amended as permit 0396-009A, Project 2006-09-088.

NSPS Applicability

40 CFR Part 60, Subpart L, *Standards of Performance for Secondary Lead Smelters*

This rule applies to this installation because the facility was built after the applicability date of the subpart. The exhaust streams from the blast furnace and the pot furnaces are combined in the scrubber stack, therefore, the combined exhaust has an opacity limit of 10 percent.

40 CFR Part 60, Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*

This rule does not apply to this installation because the crushing operation at the installation does not meet the applicability design rate of the subpart of 25 tons per hour. This operation has a MHDR of 8 tons per hour.

40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This regulation does not apply to the petroleum storage tanks at the installation because those tanks are under the applicability size of the subpart.

40 CFR Part 60, Subpart WWW, *Standards of Performance for Municipal Solid Waste Landfills*

The installation's landfill is a special waste landfill and does not contain municipal solid waste. The landfill is regulated by the Missouri Department of Natural Resources Hazardous Waste Program and the Missouri Department of Natural Resources Solid Waste Program regulations. Therefore, this rule does not apply.

MACT Applicability

40 CFR Part 63, Subpart X, *National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting*

This rule is applicable to this installation by definition.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

Subpart M Asbestos was checked as applicable in the operating permit application and is included as a plant wide condition.

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

40 CFR Part 64 is not applicable because the lime (EU0150, EU0180, EU0190) and cement (EU0160 and EU0170) silos each have potential pre-control emissions of particulate matter that are not at least 100 percent of major source amount. § 64.2(a)(3)

The other emission points either do not have control devices or are covered by the Subpart X NESHAP. § 64.2(b)(1)(I)

Other Regulatory Determinations

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

This rule is exempts EU0010 through EU0050 because these sources are regulated by 40 CFR Part 60, Subpart L. The NSPS requires that the source remain below ten percent opacity for these emission units, which is more stringent than this regulation.

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

This rule applies to the blast furnace (EU0010) at the installation. However, because 40 CFR Part 60, Subpart L, also applies and is more stringent, this rule was excluded.

This rule also applies to the water treatment lime silo (EU0150), north cement silo (EU0160), south cement silo (EU0170), scrubber lime silo #1 (EU0180), and scrubber lime silo #2 (EU0190). It is highly unlikely that emission units would exceed the pound per hour limit emission limit without controls, therefore no monitoring or record keeping is required to show compliance with that standard. However, these emission units do have the potential to exceed the 0.30 grains per standard cubic feet per minute limit without controls. The baghouses associated with these units are required to be operated in accordance with Construction Permit 0396-009, and it is highly unlikely that these emission units would exceed the standard with the controls operating. Therefore, no monitoring or recordkeeping is required for the facility to comply with this rule. The calculations that show compliance with this rule are included in Attachment 1 of the operating permit.

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 that 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:

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