

Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

AUG 19 2019

Mr. David Mckercher  
Exide Technologies-Canon Hollow Plant  
P.O. Box 159  
Forest City, MO 64451

Re: Renewal of Part 70 Operating Permit  
Installation ID: 087-0001, Permit Number: OP2019-017

Dear Mr. Mckercher:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bj

Enclosures

c: PAMS File: 2014-10-072



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## PART 70 PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

**Operating Permit Number:** OP2019-017  
**Expiration Date:** AUG 19 2024  
**Installation ID:** 087-0001  
**Project Number:** 2014-10-072

**Installation Name and Address**

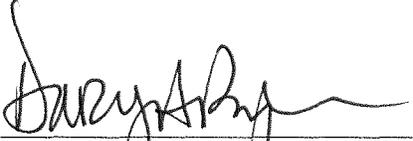
Exide Technologies-Canon Hollow Plant  
111 Canon Hollow Road  
Forest City, MO 64451  
Holt County

**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 SO<sub>x</sub> emissions.

  
\_\_\_\_\_  
Director or Designee  
Department of Natural Resources

AUG 19 2019  
\_\_\_\_\_  
Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

Emission Point #	Description	Emission Control(s)
EP001	Blast Furnace - Lead Smelting heated by coke combustion. Kettles 1 – 3	afterburner, baghouse, scrubber
EP001C	Smelting Fugitive Emissions	
EP001D	Kettle Refining Fugitive Emissions	
EP001E	Casting Fugitive Emissions	
EP002A	Plantwide Natural Gas Combustion	
EP003	Haul Road Fugitives	
EP004	Wastewater Treatment System Silo	lime silo baghouse
EP005	Emergency Generator 1, natural gas 16 kW Emergency Generator 2, natural gas 78.3 kW	
EP006	Emergency Generator 3, diesel 1,114 kW	
	Battery breaker	

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Point #	Description
	Afterburner (3 natural gas burners @ 3 mmBtu/hr)
	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
	2,500 gallon Diesel Emergency Gen Storage Tank
	Waste Water Treatment Plant
	Natural Gas Space Heaters
	Magnesium Oxide Silo
EP016	Portland Cement Silo
EP017	Portland Cement Silo
EP018	Briquetter Lime Silo
EP019	Lime Silo Scrubber

## **II. Plant Wide Emission Limitations**

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

None

### III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1		
10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(5)(C)1. Voluntary Limitation(s)		
Emission Point	Description	Control Device
EP001	Blast Furnace - Lead Smelting heated by coke combustion. Kettles 1 – 3, heated by natural gas	afterburner, baghouse, scrubber

**Emission Limitation:**

The permittee shall not allow lead emission rates in excess of the following:

Control Device		Emission Source	Emission Rate (lb/hr)
AD	Acid Demister (CD007)	Battery Break Crusher Room	0.024
EP001	Wheelabrator Air Pollution Control System	Blast Furnace, Refinery & Casting Process Hoods	0.322
BH01	Negative Pressure Baghouse #1 (CD005)	Blast Furnace, Refinery & Casting Bldg. Neg. Pressure	0.236
BH02	Negative Pressure Baghouse#2 (CD006)	Other Building Negative Pressure	0.196

**Monitoring:/Record Keeping:/Reporting:**

Monitoring, recordkeeping, and reported are achieved through Permit Conditions 4 and 5 of this document.

PERMIT CONDITION 2		
10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(5)(C)1. Voluntary Limitation(s)		
Emission Point	Description	Control Device
EP003	Haul Road Fugitives	

This is a State Only permit requirement.

**Operational Requirement:**

The permittee shall limit truck trips as follows:

Group	Route Description	Total Trips Per Month	Unrestricted Trips Per Month*
A	Cores/Scrap	368	0
	Industrials		
B	Furnace Coke	87	4
	Lime (bulk)		
	Furnace Fluxes		
C	Trash	61	3
	Acid (bulk)		
	Plastic Chips		
D	Cement (bulk)	22	1
	Oxygen (liquid)		
E	Lead Products	260	13
F	Slag Mix to Landfill	217	11
G	Service	26	1
<b>Total</b>		<b>1040</b>	<b>34</b>

\*Note: Restricted trips only use the haul roads 12 hours per day (7AM-7PM). Unrestricted trips use the haul roads 24 hours per day.

**Contingency Measure:**

The permittee shall immediately undertake the following contingency measure upon being notified that the 0.15 µg/m<sup>3</sup> three-month rolling average lead standard has been exceeded.

Contingency Measure Number	Contingency Measure Description	Time Frame
1	Increase the in-plant road cleaning to 10 hours each working day	Immediately after receipt of results

**Monitoring:/Record Keeping:/Reporting:**

The permittee shall keep records of truck traffic sufficient to demonstrate compliance with the *Operational Requirement* above.

<b>PERMIT CONDITION 3</b>		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Emission Point #	Description	Control Device
EP004	Wastewater Treatment System	wastewater treatment lime silo baghouse

**Emission Limitation:**

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

**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 and the custom standard operating procedures manual (see Permit Condition 4).
- 2) The permittee shall keep replacement filters for the baghouses 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:**

- 1) Monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
    - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
      - ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
- 2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
- 3) Observations are only required when the emission units are operating and when the weather conditions allow.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
- 5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted

for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.

- 6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

**Record Keeping:**

- 1) The permittee shall maintain records of all observation results for each emission unit using Attachments B and C or equivalent forms.
- 2) The permittee shall make these records available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) The permittee shall retain all records for five years.

**Reporting:**

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

<b>PERMIT CONDITION 4</b>		
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart L Standards for Performance for Secondary Lead Smelters		
Emission Point #	Description	Control Devices
EP001	Blast Furnace - Lead Smelting heated by coke combustion.; kettles 1 – 3 heated by natural gas	afterburner, baghouse, scrubber

**Emission Limitations:**

- 1) The permittee shall not discharge or cause the discharge into the atmosphere from any blast furnace or pot furnace (holding or refining kettle) any gases which:
  - a) Exhibit 10 percent opacity or greater. [§60.122(b)]
  - b) Contain particulate matter in excess of 50 mg/dscm (0.022 gr/dscf). [§60.122(a)(1)]

**Equipment Specification:**

- 1) The permittee shall control emissions from the furnace and kettles using a baghouse. The baghouse must be in use at all times when the furnace and/or kettles are in operation and shall be operated and maintained in accordance with the manufacturer's specifications and the custom standard operating procedures manual.
- 2) The permittee shall keep replacement filters for the baghouse 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:**

- 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 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 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.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.

**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 B and C), noting:
  - a) Whether any emissions were visible from the emission units,
  - b) Whether the visible emissions were normal for the process.
- 3) The permittee shall retain all Certified Method 9 Opacity Test results.
- 4) All records shall be maintained at the facility for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

**Reporting:**

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

<b>PERMIT CONDITION 5</b>		
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 Point #	Process	Control Device(s)
<b>Process Source</b>		
EP001	Blast Furnace - Lead Smelting heated by coke combustion. Kettles 1 – 3, heated by natural gas	afterburner, baghouse, scrubber
<b>Process Fugitive Sources</b>		
EP001C	Smelting Fugitive Emissions	
EP001D	Kettle Refining Fugitive Emissions	
EP001E	Casting Fugitive Emissions	
<b>Fugitive Dust Sources</b>		
EP003	Haul Road Fugitives	
<b>Other</b>		
	Battery Breaking	

**Emission Limitations:**

- 1) Process Source [§63.543(a)]
  - a) The permittee shall maintain the concentration of lead compounds in any process vent gas at or below 1.0 milligrams of lead per dry standard cubic meter (0.00043 grains of lead per dry standard cubic foot). [§63.543(a)]
  - b) The permittee shall maintain the flow-weighted average concentration of lead compounds in vent gases from a secondary lead smelting facility at or below 0.20 milligrams of lead per dry standard cubic meter (0.000087 grains of lead per dry standard cubic foot). [§63.543(a)]
  - c) The permittee 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(c) and Table 2]
  - d) The permittee shall not discharge or cause to be discharged into the atmosphere from any blast furnace any gases that contain dioxin and furan in excess of 170 ng/dscm, expressed as TEQ corrected to 7 percent O<sub>2</sub>. [§63.543(c) and Table 2]
  - e) The permittee does not combine furnace charging process fugitive emissions with furnace process emissions, therefore it shall maintain the total hydrocarbons concentration at or below 0.20 ppm by volume. [§63.543(f)]
- 2) Process Fugitive Sources
  - a) The permittee shall ensure that ventilation air from all enclosures hoods and total enclosures is conveyed to a control device.

**Equipment Specification:**

- 1) The permittee shall control emissions from the furnace and kettles using a baghouse. The baghouse must be in use at all times when the furnace and/or kettles are in operation and shall be operated and maintained in accordance with the manufacturer's specifications and the custom standard operating procedures manual.
- 2) The permittee shall keep replacement filters for the baghouse 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).

### **Operational Limitations:**

#### **Process Fugitive Sources**

- 1) The permittee shall control the process fugitive emission sources listed below in a total enclosure that is maintained at negative pressure at all times and vented to a control device designed to capture lead emissions: [§63.544(a)]
  - a) Smelting furnaces;
  - b) Smelting furnace charging areas;
  - c) Lead taps, slag taps, and molds during tapping;
  - d) Battery breakers;
  - e) Refining kettles, casting areas;
  - f) Dryers;
  - g) Agglomerating furnaces and agglomerating furnace product taps;
  - h) Material handling areas for any lead bearing materials except those listed in paragraph (b) of this section; and
  - i) Areas where dust from fabric filters, sweepings, or used fabric filters are processed.
- 2) Total enclosures are not required in the following areas: lead ingot product handling areas, stormwater and wastewater treatment areas, intact battery storage areas, areas where lead bearing material is stored in closed containers or enclosed mechanical conveyors, and areas where clean battery casing material is handled.
- 3) The permittee shall construct and operate total enclosures for the sources listed in paragraph a) as specified below. The total enclosure must be free of significant cracks, gaps, corrosion or other deterioration that could cause lead bearing material to be released from the primary barrier. Measures must be in place to prevent the tracking of lead bearing material out of the unit by personnel or by equipment used in handling the material. An area must be designated to decontaminate equipment and any rinsate must be collected and properly managed.
  - a) The permittee shall ventilate the total enclosure continuously to ensure negative pressure values of at least 0.013 mm of mercury (0.007 inches of water).
  - b) The permittee shall maintain an inward flow of air through all natural draft openings.
  - c) If areas that contain one or more sources listed in a) are enclosed within a larger building that also meets the definition of a total enclosure, the requirements of 1) and 2) shall be monitored at only one leeward, one windward, and one additional wall of the outermost portion of the larger totally enclosed building rather than each individual area within the building.
- 4) The permittee shall inspect enclosures and facility structures that contain any lead-bearing materials at least once per month. The permittee must repair any gaps, breaks, separations, leak points or other possible routes for emissions of lead to the atmosphere within one week of identification unless you obtain approval for an extension from the Director before the repair period is exceeded.

#### **Fugitive Dust Sources**

- 1) The permittee 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 and implemented to control the fugitive dust emissions from the following sources:
  - a) Plant roadways;
  - b) Plant buildings;
  - c) Accidental releases;

- d) Battery storage area;
  - e) Equipment maintenance;
  - f) Material storage areas; and
  - g) Material handling areas.
- 2) The permittee shall submit the standard operating procedures manual to the Director for review any time changes are made.
- 3) The controls specified in the standard operating procedures manual must at a minimum include the following requirements:
- a) Cleaning. Where a cleaning practice is specified, the permittee shall clean by wet wash or a vacuum equipped with a filter rated by the manufacturer to achieve 99.97 percent capture efficiency for 0.3 micron particles in a manner that does not generate fugitive lead dust.
  - b) Plant roadways and paved areas. The permittee shall pave all areas subject to vehicle traffic and The permittee shall clean the pavement twice per day, 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. Limited access and limited use roadways such as unpaved roads to remote locations on the property may be exempt from this requirement if they are used infrequently (no more than one round trip per day).
  - c) Accidental releases. The permittee shall initiate cleaning of all affected areas within one hour after detection of any accidental release of lead dust that exceeds 10 pounds (the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) reportable quantity for lead at 40 CFR 302.4).
  - d) Battery storage areas. The permittee shall inspect any batteries that are not stored in a total enclosure once each week and move any broken batteries to an enclosure within 72 hours of identification. The permittee shall clean residue from broken batteries within 72 hours of identification.
  - e) Materials storage and handling areas. The permittee shall wash each vehicle at each exit of the material storage and handling areas. The vehicle wash must include washing of tires, undercarriage and exterior surface of the vehicle followed by vehicle inspection.
  - f) Equipment maintenance. The permittee shall perform all maintenance activities that could generate lead dust in a manner that minimizes emissions of fugitive dust. This must include one or more of the following:
    - i) Performing maintenance inside a total permanent enclosure maintained at negative pressure.
    - ii) Performing maintenance inside a temporary enclosure and use a vacuum system either equipped with a filter rated by the manufacturer to achieve a capture efficiency of 99.97 percent for 0.3 micron particles or routed to an existing control device permitted for this activity.
    - iii) Performing maintenance inside a partial enclosure and use of wet suppression sufficient to prevent dust formation.
    - iv) Decontamination of equipment prior to removal from an enclosure.
    - v) Immediate repair of ductwork or structure leaks without an enclosure if the time to construct a temporary enclosure would exceed the time to make a temporary or permanent repair, or if construction of an enclosure would cause a higher level of emissions than if an enclosure were not constructed.
    - vi) Activities required for inspection of fabric filters and maintenance of filters that are in need of removal and replacement are not required to be conducted inside of total enclosures. Used fabric filters must be placed in sealed plastic bags or containers prior to removal from a baghouse.

- i) Material transport. The permittee shall collect and transport all lead-bearing dust within closed conveyor systems or in sealed, leak-proof containers unless the collection and transport activities are contained within a total enclosure. All other lead-bearing material must be contained and covered for transport outside of a total enclosure in a manner that prevents spillage or dust formation. Intact batteries and lead ingot product are exempt from the requirement to be covered for transport.
- 4) The standard operating procedures manual must specify that records be maintained of all pavement cleaning, vehicle washing, and battery storage inspection activities performed to control fugitive dust emissions.
- 5) The permittee shall pave all grounds on the facility or plant groundcover sufficient to prevent wind-blown dust. The permittee may use dust suppressants on unpaved areas that will not support a groundcover (e.g., roadway shoulders, steep slopes, limited-access and limited-use roadways).
- 6) As an alternative to these requirements, the permittee may demonstrate to the Director that an alternative measure(s) is equivalent or better than a practice(s) described above.
- 7) The permittee shall operate a process to separate plastic battery casing materials from all automotive batteries prior to introducing feed into a furnace.

**Monitoring:**

- 1) The permittee shall conduct performance tests according to the one of the following schedules: [§63.543(g) & (h)]
  - a) Conduct an annual performance test for lead compounds and total hydrocarbons from each process vent (no later than 12 calendar months following the previous compliance test), unless you install and operate a CEMS.
  - b) If an annual compliance test demonstrates that a process vent emitted lead compounds at 0.10 milligram of lead per dry standard cubic meter or less and total hydrocarbons at less than 50 percent of the allowable limit during the time of the annual compliance test, you may submit a written request to the Director applying for an extension of up to 24 calendar months from the previous compliance test to conduct the next compliance test for lead compounds.
- 2) 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 or cartridge filters) that are used to control process vents, process fugitive, or fugitive dust emissions from any source subject to the lead emissions standards above, including those used to control emissions from building ventilation. [ §63.548(a)]
- 3) The procedures in the standard operating procedures manual for inspections and routine maintenance must, at a minimum, include the following requirements: [ §63.548(c)]
  - a) Daily monitoring of pressure drop across each baghouse cell;
  - b) Weekly confirmation that dust is being removed from hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms.
  - c) Daily check of compressed air supply for pulse-jet baghouses;
  - d) An appropriate methodology for monitoring cleaning cycles to ensure proper operation;
  - e) Monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means;
  - f) Monthly check of bag tension on reverse air and shaker-type baghouses. Such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices;
  - g) Quarterly confirmation of the physical integrity of the baghouse through visual inspection of the baghouse interior for air leaks;

- h) Quarterly inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means; and
  - i) Except as provided in 7) and 8) below, continuous operation of a bag leak detection system, unless a CEMS system meeting the requirements of §63.548(m) for a continuous emissions monitoring system is installed for monitoring the concentration of lead.
- 4) The procedures in the standard operating procedures manual for baghouse maintenance must include, at a minimum, a preventative maintenance schedule that is consistent with the baghouse manufacturer's instructions for routine and long-term maintenance. [ §63.548(d)]
- 5) The bag leak detection system, 3)i) above, must meet the following specifications and requirements: [ §63.548(e)]
- a) The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 1.0 milligram per actual cubic meter (0.00044 grains per actual cubic foot) or less;
  - b) The bag leak detection system sensor must provide output of relative particulate matter loadings;
  - c) The bag leak detection system must be equipped with an alarm system that will alarm when an increase in relative particulate loadings is detected over a preset level;
  - d) The permittee shall install and operate the bag leak detection system in a manner consistent with the guidance provided in “Office of Air quality Planning and Standards (OAQPS) Fabric Filter Bag Leak Detection Guidance” EPA-454/R-98-015, September 1997 (incorporated by reference, see §63.14) and the manufacturer's written specifications and recommendations for installation, operation, and adjustment of the system;
  - e) The permittee shall not adjust the sensitivity (range), averaging period, alarm set points, or alarm delay time, except as detailed in the approved standard operating procedures manual. The permittee shall not increase the sensitivity by more than 100 percent or decrease the sensitivity by more than 50 percent over a 365 day period unless such adjustment follows a complete baghouse inspection that demonstrates that the baghouse is in good operating condition;
  - f) For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the permittee shall install the bag leak detector downstream of the baghouse and upstream of any wet acid gas scrubber; and
  - g) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- 6) The permittee shall include in the standard operating procedures manual 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 must include, at a minimum, the procedures to be used to determine and record the time and cause of the alarm as well as the corrective actions taken to minimize emissions as follows; [ §63.548(f)]
- a) The procedures used to determine the cause of the alarm must be initiated within 30 minutes of the alarm; and
  - b) The cause of the alarm must be alleviated by taking the necessary corrective action(s) that may include, but not be limited to, the following:
    - i) Inspecting the baghouse for air leaks, torn or broken filter elements, or any other malfunction that may cause an increase in emissions;
    - ii) Sealing off defective bags or filter media;
    - iii) Replacing defective bags or filter media, or otherwise repairing the control device;
    - iv) Sealing off a defective baghouse compartment;
    - v) Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system; or

- vi) Shutting down the process producing the particulate emissions.
- 7) Baghouses equipped with high efficiency particulate air (or HEPA) filters as a secondary filter are exempt from the requirement to be equipped with a bag leak detection system. The permittee shall monitor and record the pressure drop across each HEPA filter system daily. If the pressure drop is outside the limit(s) specified by the filter manufacturer, The permittee shall take appropriate corrective measures, which may include but not limited to the following: [ §63.548(g)]
  - a) Inspecting the filter and filter housing for air leaks and torn or broken filters;
  - b) Replacing defective filter media, or otherwise repairing the control device;
  - c) Sealing off a defective control device by routing air to other control devices; or
  - d) Shutting down the process producing the particulate emissions.
- 8) Baghouses followed by a wet electrostatic precipitator used as a secondary control device are exempt from the requirement to be equipped with a bag leak detection system. [ §63.548(h)]
- 9) If the permittee uses a wet scrubber to control particulate matter and metal hazardous air pollutant emissions from a process vent to demonstrate continuous compliance with the emissions standards, it shall monitor and record the pressure drop and water flow rate values at least once every hour and shall maintain the pressure drop and water flow rate at levels no lower than 30 percent below the pressure drop and water flow rate measured during the initial performance or most recent compliance test. [ §63.548(i)]
- 10) The permittee shall comply with the following requirements to demonstrate continuous compliance with the total hydrocarbons emissions standards. During periods of startup and shutdown, the requirements of b) do not apply. Instead, the permittee shall demonstrate compliance with the standard for total hydrocarbon by meeting the requirements of §63.543(l). [ §63.548(j)]
  - a) Continuous temperature monitoring. The permittee shall install, calibrate, maintain, and continuously operate a device to monitor and record the temperature of the afterburner or furnace exhaust streams.
  - b) To demonstrate continuous compliance with the standards for total hydrocarbons, the permittee shall maintain an afterburner or exhaust temperature such that the average temperature in any 3-hour period does not fall more than 28° Celsius (50° Fahrenheit) below the average established in paragraph (j)(3) of this section.
- 11) The permittee shall install, operate, and maintain a digital differential pressure monitoring system to continuously monitor each total enclosure as described below: [ §63.548(k)]
  - a) The permittee shall install and maintain a minimum of one building digital differential pressure monitoring system at each of the following three walls in each total enclosure that has a total ground surface area of 10,000 square feet or more:
    - i) The leeward wall;
    - ii) The windward wall; and
    - iii) An exterior wall that connects the leeward and windward wall at a location defined by the intersection of a perpendicular line between a point on the connecting wall and a point on its furthest opposite exterior wall, and intersecting within plus or minus 10 meters of the midpoint of a straight line between the two other monitors specified. The midpoint monitor must not be located on the same wall as either of the other two monitors. If approved by the Department, this third monitor may be placed in an alternative location on the midpoint wall or an exterior wall that is not the windward wall, leeward wall or midpoint wall.
  - b) The permittee shall install and maintain a minimum of one building digital differential pressure monitoring system at the leeward wall of each total enclosure that has a total ground surface area of less than 10,000 square feet.

- c) The digital differential pressure monitoring systems must be certified by the manufacturer to be capable of measuring and displaying negative pressure containing values in the range of 0.01 to 0.2 millimeters mercury (0.005 to 0.11 inches of water) and capable of recording data in increments of 0.002 millimeters of mercury (0.001 inches of water).
- d) The permittee shall equip each digital differential pressure monitoring system with a continuous recorder. To demonstrate compliance with the standard for differential pressure, The permittee shall maintain the pressure in total enclosures such that the average pressure in any 15-minute period does not fall below the level specified in §63.544(c)(1). The 15-minute averages must include at least one reading per minute.
- e) The permittee shall calibrate each digital differential pressure monitoring system in accordance with manufacturer's specifications.

**Record keeping:**

- 1) The permittee shall maintain records as follows: [§63.550(a)]
  - a) Records must be maintained in a form suitable and readily available for expeditious review. However, electronic recordkeeping and reporting if suitable for the specific case (e.g., by electronic media such as Excel spreadsheet, on CD or hard copy).
  - b) Records must be kept on site for at least 2 years after the date of occurrence, measurement, maintenance, corrective action, report, or record.
- 2) The permittee shall submit to the director standard operating procedures manuals in electronic format for review and approval whenever an update is made to the procedure. [§63.550(b)]
- 3) The permittee shall maintain the following records for a period of 5 years: [§63.550(c)]
  - a) Electronic records of the bag leak detection system output.
  - b) An identification of the date and time of all bag leak detection system alarms, the time that procedures to determine the cause of the alarm were initiated, the cause of the alarm, an explanation of the corrective actions taken, and the date and time the cause of the alarm was corrected.
  - c) All records of inspections and maintenance activities described in the standard operating procedures manual for baghouses.
  - d) Electronic records of the pressure drop and water flow rate values for wet scrubbers used to control lead emissions from process fugitive sources.
  - e) Electronic records of the output from the continuous temperature monitor, identification of periods when the 3-hour average temperature fell below the minimum established, and an explanation of the corrective actions taken.
  - f) Electronic records of the continuous pressure monitors for total enclosures and identification of periods when the pressure was not maintained as required.
  - g) Records of any time periods power was lost to the continuous pressure monitors for total enclosures and records of loss of power to the air handling system maintaining negative pressure on total enclosures.
  - h) Records of the inspections of facility enclosures.
  - i) Records of all cleaning and inspections required as part of the practices described in the standard operating procedures manual for the control of fugitive dust emissions.
  - j) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control equipment and monitoring equipment.
  - k) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

- l) Records of any periods of startup or shutdown of a furnace and actions taken to minimize emissions during that period.
- 4) In addition to the information required above, the permittee shall include in the reports the following information: [§63.550(e)]
  - a) Records of the concentration of lead in each process vent, and records of the rolling 12-month flow-weighted average concentration of lead compounds in vent gases calculated monthly.
  - b) Records of the concentration of total hydrocarbon in each process vent that has established limits for total hydrocarbons.
  - c) Records of all alarms from the bag leak detection system.
  - d) A description of the procedures taken following each bag leak detection system alarm.
  - e) A summary of the records maintained as part of the practices described in the standard operating procedures manual for baghouses, including an explanation of the periods when the procedures were not followed and the corrective actions taken.
  - f) An identification of the periods when the pressure drop and water flow rate of wet scrubbers used to control process fugitive sources dropped below the established levels and an explanation of the corrective actions taken.
  - g) Records of the temperature monitor output, in 3-hour block averages, for those periods when the temperature fell below the established level.
  - h) Certification that the plastic separation process for battery breakers was operated at all times the battery breaker was in service.
  - i) Records of 15-minute periods when the pressure was not maintained or power was lost to the continuous pressure monitoring system. Records of which wall is chosen as the windward wall must be included if a total enclosure located within a larger structure is not impacted by ambient wind.
  - j) If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction that occurred during the reporting period and caused or may have caused any applicable emissions limitation to be exceeded. The report must also include a description of actions taken during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction.
  - k) 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 were not followed and the corrective actions taken. The reports must not contain copies of the daily records required to demonstrate compliance with the requirements of the standard operating procedures manuals.
  - l) Records of any periods of startup or shutdown of a furnace including an explanation of the periods when procedures were not followed and the corrective actions taken.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.
- 3) The permittee shall submit the following records to the EPA's Central Data Exchange by using the Electronic Reporting Tool ([http://www.epa.gov/ttn/chief/ert/ert\\_tool.html](http://www.epa.gov/ttn/chief/ert/ert_tool.html)):

- a) Within 60 days after the date of completing each performance test, submit performance test data, except opacity data. Only data collected using test methods compatible with the Electronic Reporting Tool are subject to this requirement to be submitted electronically into EPA's WebFIRE database.
- b) Within 60 days after the date of completing each CEMS performance evaluation test, submit the relative accuracy test audit data electronically into EPA's Central Data Exchange by using the Electronic Reporting Tool. Only data collected using test methods compatible with the Electronic Reporting Tool are subject to this requirement to be submitted electronically into EPA's WebFIRE database.

<b>PERMIT CONDITION 6</b>	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Point #	Description
EP005	Emergency Generator 1, natural gas 16 kW Emergency Generator 2, natural gas 78.3 kW
EP006	Emergency Generator 3, diesel 1,114 kW

**Maintenance Standards:**

- 1) The permittee shall meet the following maintenance requirements for these units [Table 2d]:
  - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
    - i) The permittee may use an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement.
  - b) Inspect air cleaner every 1,000 hours of operations or annually, whichever comes first; and
  - c) Inspect all hoses and belts every 500 hours of operations or annually, whichever comes first, and replace as necessary.

**Operational Standards:**

- 1) The permittee shall operate and maintain the emergency RICE and after- treatment control device (if any) according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
- 2) The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
- 3) The permittee shall operate the emergency stationary RICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited. [§63.6640(f)]
  - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
  - b) The permittee may operate the emergency stationary RICE for the purpose specified in i) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c) below count as part of the 100 hours per calendar year allowed. [§63.6640(f)(2)]
    - i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the

manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]

- c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph §63.6640(f)(2). Except as provided in i) below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
- i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)(A) through (E)]
- (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
  - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
  - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
  - (4) The power is provided only to the facility itself or to support the local transmission and distribution system.
  - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.
- 4) If the permittee does not operate the engine according to the requirements in 3)a) through c) above, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]
- 5) The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an operating and maintenance log using Attachment D or an equivalent.
- 2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records must be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition to the Air Pollution Control Program's Compliance

and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or  
[AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

<b>PERMIT CONDITION 7</b> 10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds	
<b>Emission Point #</b>	<b>Description</b>
EP001	Blast Furnace - Lead Smelting heated by coke combustion. Kettles 1 – 3, heated by natural gas
EP006	Emergency Generator 3, diesel 1,114 kW

Note: As of issuance of this permit, 10 CSR 10-6.260 is a Federal Only requirement. This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it remains in Missouri's SIP and thus still remains an applicable federal regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 10-6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action is required on the part of the permittee to remove this permit condition from this operating permit upon the removal of 10 CSR 10-6.260 from the Missouri SIP.

**Emission Limitation:**

The permittee shall not allow emissions from either EP001 or EP006 to contain more than 500 parts per million by volume (ppmv) of sulfur dioxide or more than 35 milligrams per cubic meter (mg/m<sup>3</sup>) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

**Monitoring/Recordkeeping:**

EP001

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

EP006

- 5) The permittee shall determine compliance using fuel delivery records.
- 6) The permittee must maintain a record of fuel deliveries.
- 7) The permittee must maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
  - a) The name, address, and contact information of the fuel supplier;

- b) The type of fuel;
- c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
- d) The heating value of the fuel.

**Both**

- 8) The permittee shall maintain records for a minimum of five years on-site.
- 9) The permittee shall make all records available within five business days upon written or electronic to Missouri Department of Natural Resources' personnel upon request.
- 10) The permittee shall furnish the Missouri Department of Natural Resources all data necessary to determine compliance status.

**Reporting:**

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit condition, or any malfunction which could cause an exceedance of any of the terms imposed by this permit condition, no later than ten days after the exceedance or event causing the exceedance. The permittee shall submit these reports to Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report (SAM) and annual compliance certification (ACC). The permittee shall submit the SAM and ACC reports to both the EPA Region VII and Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

<b>PERMIT CONDITION 8</b>	
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions	
<b>Emission Point #</b>	<b>Description</b>
EP001	Blast Furnace - Lead Smelting heated by coke combustion. Kettles 1 – 3, heated by natural gas

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement. Missouri's SIP has not adopted this regulation; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action is required on the part of the permittee upon the adoption of 10 CSR 10-6.261 into the Missouri SIP.

**Emission Limitation:**

The permittee shall not allow emissions from either EP001 to contain more than 8 pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.

**Monitoring/ Recordkeeping**

**EP001**

- 1) The permittee shall install, calibrate, operate and maintain a continuous emission monitoring (CEM) system for measuring sulfur oxides. [10 CSR 10-6.261(3)(D)2.]
- 2) The permittee shall certify the continuous emission monitoring system in accordance with 40 CFR Part 60 Appendix B. Performance Specification 2 and Section 60.13 as is pertinent to SO<sub>2</sub> continuous monitors as adopted by reference in 10 CSR 10-6.070.

- 3) The permittee shall set the span of the SO<sub>2</sub> continuous monitor at an SO<sub>2</sub> concentration of one-fifth percent (0.02%) by volume.
- 4) For the purpose of the SO<sub>2</sub> 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.

### **Reporting**

- 1) The permittee shall report any excess emissions other than startup, shutdown, and malfunction excess emissions already required to be reported under 10 CSR 10-6.050 to the director for each calendar quarter within thirty days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following: [10 CSR 10-6.261(4)(A)1.]
  - a) Name and location of source;
  - b) Name and telephone number of person responsible for the source;
  - c) Identity and description of the equipment involved;
  - d) Time and duration of the period of SO<sub>2</sub> excess emissions;
  - e) Type of activity;
  - f) Estimate of the magnitude of the SO<sub>2</sub> excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
  - g) Measures taken to mitigate the extent and duration of the SO<sub>2</sub> excess emissions; and
  - h) Measures taken to remedy the situation which caused the SO<sub>2</sub> excess emissions and the measures taken or planned to prevent the recurrence of these situations
- 2) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
- 3) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

## IV. Core Permit Requirements

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

### 10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

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

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

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

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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

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.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall 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.

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

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

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

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

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

#### **This is a State Only permit requirement.**

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

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

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

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

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

##### **Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

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

**Recordkeeping:**

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

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

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

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

**10 CSR 10-6.250 Asbestos Abatement Projects**

**Certification, Accreditation, and Business Exemption Requirements**

**This is a State Only permit requirement.**

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.

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

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

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

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

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

completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

## V. General Permit Requirements

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

### Permit Duration

#### 10 CSR 10-6.065(5)(C)1.B, 10 CSR 10-6.065(5)(E)3.C

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### General Record Keeping and Reporting Requirements

#### 10 CSR 10-6.065(5)(C)1.C

- 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 available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).
  - 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.
  - 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. 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 (5)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice

- must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
  - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

### **Risk Management Plan Under Section 112(r)**

#### **10 CSR 10-6.065(5)(C)1.D**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

### **Severability Clause**

#### **10 CSR 10-6.065(5)(C)1.F**

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.

### **General Requirements**

#### **10 CSR 10-6.065(5)(C)1.G**

- 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(5)(C)1.

### **Incentive Programs Not Requiring Permit Revisions**

#### **10 CSR 10-6.065(5)(C)1.H**

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.

### **Reasonably Anticipated Operating Scenarios**

#### **10 CSR 10-6.065(5)(C)1.I**

There are no reasonably anticipated operating scenarios.

### **Compliance Requirements**

#### **10 CSR 10-6.065(5)(C)3**

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

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

### **Permit Shield**

#### **10 CSR 10-6.065(5)(C)6**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of 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.

### **Emergency Provisions**

#### **10 CSR 10-6.065(5)(C)7**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

### **Operational Flexibility** **10 CSR 10-6.065(5)(C)8**

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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP 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 APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

### **Off-Permit Changes** **10 CSR 10-6.065(5)(C)9**

- 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 permit, 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(B)3 of this rule. 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.

### **Responsible Official**

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

The application utilized in the preparation of this permit was signed by David Mckercher, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the 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.

### **Reopening-Permit for Cause**

#### **10 CSR 10-6.065(5)(E)6**

This permit shall be reopened for cause if:

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

**Statement of Basis**

**10 CSR 10-6.065(5)(E)1.C**

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

**VI. Attachments**

Attachments follow.



**Attachment B**

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

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

**Attachment C**

Method 9 Opacity Observations		
Installation Name:	Sketch of the observer's position relative to the emission unit	
Emission Point:		
Emission Unit:		
Observer Name and Affiliation:		
Observer Certification Date:		
Method 9 Observation Date:		
Height of Emission Point:		
Time:	Start of observations	End of observations
Distance of Observer from Emission Point:		
Observer Direction from Emission Point:		
Approximate Wind Direction:		
Estimated Wind Speed:		
Ambient Temperature:		
Description of Sky Conditions (Presence and color of clouds):		
Plume Color:		
Approximate Distance Plume is Visible from Emission Point:		

**Attachment C (continued) Method 9 Opacity Observations**

Minute	Seconds				1- minute Avg. % Opacity <sup>1</sup>	6- minute Avg. % Opacity <sup>2</sup>	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity) <sup>3</sup>								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
12									
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28									
29									
30									

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

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

\_\_\_\_\_  
 Signature of Observer

<sup>1</sup> 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.

<sup>2</sup> 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.

<sup>3</sup> Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.



## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

Exide Technologies-Canon Hollow Plant is a secondary lead smelting plant. The process starts with receiving used lead-acid batteries for processing. The batteries are placed on a vibratory plate and then rotated to allow the battery tops to be removed with a saw. The batteries are drained, and the battery components separated for further processing. Non-lead components (i.e., plastic from battery cases and acid) are collected and sent to other facilities for processing. The lead components are staged to allow them to dry. When the lead-bearing material is sufficiently dried, it is charged to a blast furnace. In addition to lead-bearing material, coke, flux, and oxygen are added to the blast furnace. Molten lead moves to the bottom of the blast furnace and is eventually sent to a refining kettle. At the refining kettle, alloys are added to meet final lead specifications. The lead is then cast into 2,000 pound blocks and 65 pound ingots.

On September 25, 2014, Exide Technologies, the Missouri Attorney General's office, and the Department signed a consent agreement to address violations of the 2008 Lead National Ambient Air Quality Standard. The agreement covered numerous upgrades to emission controls, including standard operating procedures manuals for fugitive dust control and baghouses. This operating permit includes federally-enforceable voluntary limitations with the same conditions as the consent agreement in order to allow Exide Technologies to terminate the agreement.

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 SO<sub>x</sub> emissions. It was previously also a major source of VOCs, but stack tests done after the upgrades from the consent agreement show that it is now a minor source of VOC emissions. It is a named source (secondary metal production) and fugitive emissions are counted in potential-to-emit calculations.

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

Pollutants	Potential Emissions <sup>1</sup>	Reported Emissions				
		2018	2017	2016	2015	2014
PM <sub>10</sub>	53.91	32.86	35.18	34.01	33.58	36.97
PM <sub>2.5</sub>	43.49	29.49	31.40	30.46	30.07	33.20
SO <sub>x</sub>	1,871.33	117.64	127.22	142.01	145.99	174.20
NO <sub>x</sub>	18.36	7.55	7.36	7.12	6.48	6.83
VOCs	74.98	48.97	50.68	57.92	53.36	8.43
CO	12.18	3.87	3.98	3.62	3.21	3.25
Lead (Pb)	0.44	0.12	0.25	0.25	0.08	0.42
HAPs (non-lead) <sup>2</sup>	47.74	30.1	32.27	36.88	33.97	5.37

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

<sup>2</sup>HAPs reported to MOEIS as VOCs. No single HAP has a PTE greater than 7 tpy.

**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 October 31, 2014;
- 2) 2018 Emissions Inventory Questionnaire, received April 30, 2019;
- 3) Construction Permit 0396-009, Project Number EX0870001005
- 4) Construction Permit 0396-009A, Project Number 2006-09-088
- 5) Consent Agreement of September 25, 2014;
- 6) WebFIRE; and
- 7) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

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

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

This rule does not apply because it only applies to existing lead smelter facilities not subject to New Source Performance Standards. 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' Waste Management Program. Therefore, this rule does not apply.

**Construction Permit History**

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 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, and included amended baghouse conditions for the silos.

**New Source Performance Standards (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 June 11, 1973. 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 lead is not considered a nonmetallic mineral [40 CFR §60.671], the requirements of Subpart 000 do not apply to the slag stabilization crusher system.

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*

This rule does not apply because 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' Waste Management Program.

### **Maximum Achievable Control Technology (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 (see Permit Condition 5).

40 CFR Part 63, Subpart ZZZZ *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* does not contain recordkeeping requirements for inspection and maintenance of emergency generators. The monitoring requirements included in Permit Condition 6 were added to address this lack.

40 CFR Part 63, Subpart CCCCCC—*National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

This rule does not apply because the installation is a major source.

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

None

### **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 applicable, but continuous monitoring is already required by 10 CSR 10-6.261 (see Permit Condition 8).

### **Other Regulatory Determinations**

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

This rule exempts EP001 because these sources are regulated by 40 CFR Part 60, Subpart L. All other potential visible emission sources (hoppers, landfill, etc) are fugitives.

10 CSR 10-6.260 *Restriction of Emissions of Sulfur Compounds*/10 CSR 10-6.261 *Control of Sulfur Dioxide Emissions*

10 CSR 10-6.260 applies to EP006, but ultra-low diesel fuel guarantees compliance with the fuel standard. 10 CSR 10-6.261 does not apply to EP006 because it uses only ultra-low sulfur diesel fuel.

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

This rule exempts EP001 because these sources are regulated by 40 CFR Part 60, Subpart L, which require the use of a baghouse [(1)(B)15]. All other potential visible emission sources (hoppers, landfill, etc) are fugitives [(1)(B)7].

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

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

1. The specific pollutant regulated by that rule is not emitted by the installation;

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

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

## Response to Public Comments

A draft of the Part 70 Exide Technologies-Canon Hollow Plant was placed on public notice on April 5, 2019, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The four comments are addressed in the order in which they appear within the letter.

### **Comment #: 1**

The Operational Requirement, in Permit Condition 2, says: "The permittee shall limit truck as follows:" EPA believes the clarity of this operational requirement might be improved with the addition of the word "trips" after the word "truck." Also, Monitoring / Record keeping / Reporting requirement indicates the necessary requirements are achieved through Permit Condition 4 and Permit Condition 5. However, neither Permit Condition 4 nor Permit Condition 5 provide for the documented verification of monthly total and/or unrestricted truck trips. It should be noted, the Consent Judgement, between Exide-Canon Hollow and MoDNR signed September 25, 2014, requires Exide to keep records of truck traffic as necessary to demonstrate compliance with the established hours of operation and monthly frequency limits. EPA encourages MoDNR consider including the agreed upon truck traffic record keeping requirement to Permit Condition 2.

Additionally, Permit Condition 2 requires the permittee to immediately undertake contingency measures if the valid and accepted air quality data for any rolling three-month average violates the  $0.15\mu\text{g}/\text{m}^3$  lead standard. Again, Permit Condition 2 indicates the Monitoring / Record keeping / Reporting requirements are achieved through Permit Condition 4 and Permit Condition 5. However, neither Permit Condition 4 nor Permit Condition 5 describe the process Exide-Canon Hollow uses for monitoring air quality and tracking the valid air quality data to verify compliance with the three-month rolling average lead standard. These determinations are critical to the implementation of the contingency measures and EPA encourages MoDNR consider adding these monitoring / record keeping / reporting requirement to Permit Condition.

Finally, it appears that Permit Condition 2 requirements are imposed against Exide-Canon Hollow, to meet ambient air quality standards and therefore Permit Condition 2 is a "State Only Requirement" and EPA suggests that MoDNR add the "State Only Requirement" designation to Permit Condition 2.

### **Response to Comment:**

The first and third suggestions were incorporated into Permit Condition 2. The phrase "valid and accepted air quality data" refers to state-run monitor data that is uploaded to the Air Quality Subsystem. Exide has no role in collecting or verifying that data, only implementing the contingency measure if it is exceeded.

**Comment #: 2**

Permit Condition 4 incorporates requirements from 40 CFR part 60, Subpart L-Standards of Performance for Secondary Lead Smelters as they apply to Emission Point EP001 Blast Furnace Lead Smelter heated by coke combustion Kettles 1-3 heated by natural gas. §60.123(b)(1) requires the owner or operator to use Method 5 to determine particulate matter concentration during representative periods of furnace operation including charging and tapping with the sampling time and sample volume for each run to be at least 60 minutes and 0.90 dscm (31.8 dscf). However, the Monitoring requirements in Permit Condition 4 do not include any particulate matter compliance verification monitoring. 10 CSR 10-6.065(5)(C)I.C.(I)(b) authorizes MoDNR to require periodic monitoring sufficient to yield reliable data where the applicable requirement (40 CFR part 60, Subpart L) does not require periodic testing or instrumental or non-instrumental monitoring. Therefore, EPA encourages MoDNR consider a requirement for periodic particulate matter verification monitoring in Permit Condition 4.

**Response to Comment:**

The testing requirement from Subpart X was added to the Monitoring section of Permit Condition 5.

**Comment #: 3**

Permit Condition 5 incorporates requirements from 40 CFR part 63, Subpart X-National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting applicable to Emission Point EP001 Blast Furnace Lead Smelter heated by coke combustion Kettles 1-3 heated by natural gas; Emission Point EP001C Smelting Furnace Fugitives Emissions; Emission Point EP001D Kettle Refining Fugitive Emissions; Emission Point EP001E Casting Fugitive Emissions; Emission Point EP003 Haul Road Fugitives; and Battery Breaking. Process Source Emission Limitation c) references §63.543(c) and Table 2, as the authority and origin, for limitation on blast furnace gasses into the atmosphere that contain total hydrocarbons in excess of 360 parts per million by volume, expressed as propane corrected to 4 percent carbon dioxide. It should be noted that Table 2 also includes a limitation on blast furnace gasses that contain dioxin and furan in excess of 170 ng/dscm, expressed as TEQ corrected to 7 percent O<sub>2</sub>. The limitation on dioxin and furans appears to be an applicable requirement, therefore, pursuant to 10 CSR 10-6-065(5)(C)I, EPA recommends MoDNR consider adding the applicable dioxin and furan emission limitation to Permit Condition 5.

Additionally, §63.543(h) says: "Following the initial performance or compliance test to demonstrate compliance with the total hydrocarbons emissions limits in paragraphs (c) and (f) of this section, you must conduct an annual performance test for total hydrocarbons emissions from each process vent that has established limits for total hydrocarbons (no later than 12 calendar months following the previous compliance test), unless you install and operate a CEMS meeting the requirements of §63.8. If an annual compliance test demonstrates that a process vent emitted total hydrocarbons at less than 50 percent of the allowable limit during the time of the annual compliance test, you may submit a written request to the Administrator applying for an extension of up to 24 calendar months from the previous compliance test to conduct the next compliance test for total hydrocarbons." Also, §63.543(i) says: "Following the initial performance or compliance test to demonstrate compliance with the dioxins and furans emissions limits specified in paragraph (c) of this section, you must conduct a performance test for dioxins and furans emissions from each process vent that has established limits for dioxins and furans at least once every 6 years following the previous compliance test." However, the Monitoring requirements, in Permit Condition 5 do not include either of these hydrocarbon and

dioxin and furan periodic compliance demonstration tests. Again, pursuant to 10 CSR 10-6-065(5)(C), EPA recommends MoDNR consider adding the applicable hydrocarbon and dioxin and furan monitoring requirements to Permit Condition 5.

Finally, Monitoring requirement 2)i), in Permit Condition 5, references "the requirements in 12) below" (emphasis added). However, there is no "12) below," therefore EPA recommends MoDNR might want to consider revising the included reference.

**Response to Comment:**

The dioxin/furan limit was added to the emission limitations of Permit Condition 5. As noted in the response to Comment 2, the testing requirement was added to the monitoring section of Permit Condition 5.

**Comment #: 4**

Permit Condition 6 incorporates requirements from 40 CFR part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as applicable to Emission Point EP005 Emergency Generator 1, natural gas 16kW; Emergency Generator 2, natural gas 78.JkW; and Emission Point EP006 Emergency Generator 3, diesel 1,114kW. In the Reporting section, MoDNR requires the permittee to submit deviation reports , from the operational limitation, monitoring, record keeping and reporting requirements, to EPA Region 7. However, pursuant to 10 CSR 10-6.075(3)(B), MoDNR is identified as the "Primary Regulating Agency" for Subpart ZZZZ major sources, and according to the Updated Potential to Emit Table, in the Statement of Basis, Exide-Canon Hollow is a major source of hazardous air pollutants (HAP). Therefore, EPA suggests MoDNR is the appropriate recipient of these deviation reports and suggests MoDNR consider modifying the reporting scenario in Permit Condition 6.

**Response to Comment:**

The reporting section was corrected as suggested.