



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

INTERMEDIATE STATE 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.

Intermediate Operating Permit Number: OP2106-023
Expiration Date: AUG 15 2021
Installation ID: 047-0059
Project Number: 2014-04-025

Installation Name and Address

Liberty Distribution Center Hallmark
Cards, Inc.
2101 N. Lightburne
Liberty, MO 64068
Clay County

Parent Company's Name and Address

Hallmark Cards, Inc.
2501 McGee
Kansas City, MO 64108

Installation Description:

Liberty Distribution Center is a warehouse for Hallmark Cards, Inc. The center is located in Liberty, MO, which is part of the Kansas City attainment area. It is a synthetic minor source for NOx.

for Michael Stoufflet
Prepared by:
Bern Johnson
Operating Permit Unit

Kyra L Moore
Director or Designee
Department of Natural Resources

AUG 15 2016

Effective Date

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS.....	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
PERMIT CONDITION PW001	5
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	6
PERMIT CONDITION 1	6
10 CSR 10-2.210 Control of Emissions from Solvent Metal Cleaning.....	6
PERMIT CONDITION 2	8
10 CSR 10-6.075 MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS.....	8
40 CFR PART 63, SUBPART ZZZZ—NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES	8
PERMIT CONDITION 3	10
10 CSR 10-6.075 MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS.....	10
40 CFR 63 Subpart CCCCC Gasoline Dispensing Facilities	10
PERMIT CONDITION 4	11
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	11
Sources Installed After February 24, 1971	11
PERMIT CONDITION 5	12
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions	12
IV. CORE PERMIT REQUIREMENTS	13
V. GENERAL PERMIT REQUIREMENTS.....	20
VI. ATTACHMENTS	24
ATTACHMENT A	25
Fugitive Emission Observations	25
ATTACHMENT B	26
Opacity Emission Observations.....	26
ATTACHMENT C	27
Method 9 Opacity Emissions Observations	27
ATTACHMENT D	28
Inspection/Maintenance/Repair/Malfunction Log	28
ATTACHMENT E	29
NOx Compliance Worksheet	29
APPENDIX A.....	30
Abbreviations and Acronyms	30

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Liberty Distribution Center is a warehouse for Hallmark Cards, Inc. The center is located in Liberty, MO, which is part of the Kansas City attainment area. It is not a named source and fugitive emissions are not included in potential-to-emit calculations. Because it has accepted a voluntary emission limit on oxides of nitrogen (NO_x), it is a synthetic minor source.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.17	0.14	0.10	0.14	0.15
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.17	0.14	0	0	0
Sulfur Oxides (SO _x)	0.01	0.01	0.01	0.01	0.01
Nitrogen Oxides (NO _x)	2.23	1.80	1.33	1.81	1.95
Volatile Organic Compounds (VOC)	0.12	0.10	0.07	0.10	0.11
Carbon Monoxide (CO)	1.87	1.51	1.12	1.52	1.64
Hazardous Air Pollutants (HAPs)	0.19	0.19	0.19	0.19	0.19

EMISSION UNITS WITH LIMITATIONS

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

2014 EIQ Emission Point #	Description
PTSCLN-1	Part Cleaners (3) – 66 gal capacity total
Boil-1	Boilers (3) – MHDR 83.766 mmBTU natural gas
FIREPRO-3	Diesel Fire Protection Pumps *These four fire pumps only used during fire emergencies. 2.4299 mmBTU/hr total
MSCTNKS-1	Gasoline Storage Tank 1A, *This is a 300 gallon tank built in 1992

EMISSION UNITS WITHOUT LIMITATIONS

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

2014 EIQ Emission Point #	Description
STCKPRN-2	desktop printers, copy machines, and thermal printers with fugitive emissions
FIREPRO-1	Natural Gas Heaters: A (north) and B (south), 3.5 mmBTU/h natural gas each.
FIREPRO-2	Diesel Storage Tanks for fire protection, *The largest of these four tanks is 300 gallons, they were built in 1971
MSCTNKS-2	Diesel Storage Tank 2A, *This is a 300 gallon tank built in 1992
MSCTNKS-3	Diesel Storage Tank 3A, *This is a 500 gallon tank built in 1992
BOIL-2	Diesel Underground Storage Tanks (2), *These are 15,000 gallon each (<75m ³) built in 1999
BLDGMSC-1	Back up generator (Natural Gas), 0.051182 mmBTU/hr *This is an emergency unit only used in the event of facility power outage.
BLDGMSC-2	Hot Water Tanks for Restrooms, *The largest of these five tanks has an MHDR of 0.28 MMBtu/h

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 on the date of permit issuance. 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 or Emission Units without Limitations.

<p style="text-align: center;">PERMIT CONDITION PW001</p>

<p style="text-align: center;">10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)</p>

Emission Limitation:

The permittee shall not emit more than 100 tons of oxides of nitrogen (NO_x) from the entire installation in any consecutive 12-month period.

Monitoring/Record Keeping:

- 1) The permittee shall maintain an accurate record of NO_x emissions using Attachment E or its equivalent.
- 2) All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the emission unit(s) exceeded the emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1	
10 CSR 10-2.210 Control of Emissions from Solvent Metal Cleaning	
Emission Unit	Description
PTSCLN-1	Part Cleaners – Eversol 143

Emission Limitation:

- 1) The permittee shall not operate or allow the operation of any cold cleaner using a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at 20°C (68°F) [(3)(A).1].
- 2) Exceptions [(1)(D).1]:
 - a) Cold cleaners using aqueous solvents shall be exempt from the requirement listed above.
 - b) Cold cleaners with a liquid surface area of one square foot or less or a maximum capacity of one gallon or less shall be exempt from the requirement listed above.
 - c) The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirement listed above. The Director must approve the alternative method.

Operational Limitations:

The permittee shall meet all of the following requirements:

- 1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner [(3)(A).1.D].
- 2) When one or more of the following conditions exist, the design of the cover shall be such that it can be easily operated with one hand such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems) [(3)(A).1.E]:
 - a) the solvent vapor pressure is greater than 0.3 psi measure at 37.8° C(100°F), such as in mineral spirits;
 - b) the solvent is agitated; or
 - c) the solvent is heated.
- 3) Each cold cleaner shall have a drainage facility, which will be internal so that parts are enclosed under the cover while draining [(3)(A).1.F].
- 4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8° C(100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath [(3)(A).1.G].
- 5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard [(3)(A).1.H].

- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment [(3)(A).1.I].
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8° C(100°F), or is heated above 48.9° C(120°F), must use one of the following control devices [(3)(A).1.J]:
 - a) A freeboard ratio of at least 0.75;
 - b) Water cover (solvent must be insoluble in and heavier than water); or
 - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems must receive approval from the Director prior to their use.
- 8) Each cold cleaner shall be operated as follows [(3)(B).1.]:
 - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir.
 - b) Clean parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer.
 - c) Whenever a cold cleaner fails to perform within the operating parameters established for it by this permit condition, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established operating procedures.
 - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down and leaks secured until the leaks are repaired.
 - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods in accordance with the Missouri Hazardous Waste Management Commission Rules codified as 10 CSR 25, as applicable:
 - i) reduction of the waste material to less than 20% VOC solvent by distillation and proper disposal of the still bottom waste; or
 - ii) stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director.
 - f) Waste solvent shall be stored in covered containers only.
- 9) Operators must be trained as follows [(3)(C)]:
 - a) Only persons trained in at least the operational and equipment requirements specified in 10 CSR 10-2.21 0 for their particular solvent metal cleaning process shall be permitted to operate this equipment;
 - b) The supervisor of any person who operates a solvent metal cleaning process shall receive equivalent or greater operational training than the operators; and
 - c) Refresher training shall be given to all solvent metal cleaning equipment operators at least once every 12-month period.

Monitoring/Record Keeping:

- 1) The permittee shall keep monthly inventory records of solvent consumed. The permittee shall record all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises. Purchase receipts from vendors and contractors may be used for this requirement [(4)(A)].
- 2) The permittee shall keep records of solvent metal cleaning training for each employee on an annual basis [(4)(D)].

- 3) The permittee shall maintain the following records for each purchase of cold cleaner solvent [(4)(C)]:
 - a) Name and address of the solvent supplier;
 - b) Date of purchase;
 - c) Type of solvent purchased; and
 - d) Vapor pressure of solvent in mmHg at 20°C (68°F).
- 4) The permittee shall record maintenance and repair logs for the cold cleaner using Attachment D or an equivalent form generated by the permittee.
- 5) All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the emission unit(s) exceeded the emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION 2	
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 Unit	Description
FIREPRO-3	Diesel Fire Protection Pumps 2.4299 mmBTU/hr total

Operational Standards:

- 1) 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, emergency demand response, 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 any combination of the purposes 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 and emergency demand response 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 non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
- i) 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.
- 2) If the permittee does not operate the engine according to the requirements in 1)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)]
- 3) 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.
- 4) COMM-1 only – the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed thirty minutes, after which additional standards apply (see Tables 1a, 2a, 2c, and 2d to Subpart ZZZZ) [§63.6625(h)]
- 5) COMM-1 only – the permittee shall [Table 2c from §63.6602 and §63.6625(j)]:
- i.) change oil and filter every 500 hours of operation or annually, whichever comes first;
 - ii.) inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - iii.) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

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 (5) years.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semiannual monitoring report and annual compliance certification required by Section V of this permit, except that the primary recipient shall be EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with acopy to the Air Pollution Control Program.

PERMIT CONDITION 3	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart CCCCC Gasoline Dispensing Facilities	
Emission Unit	Description
MSCTNKS-1	Gasoline Storage Tank 1A, This is a 300 gallon tank built in 1992

Operational Limitation:

- 1) The permittee shall adhere to the following requirements from 40 CFR 63.11116:
 - a) The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - i) Minimize gasoline spills [§63.11116(a)(1)];
 - ii) Clean up spills as expeditiously as practicable [§63.11116(a)(2)];
 - iii) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use [§63.11116(a)(3)];
 - iv) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators [§63.11116(a)(4)].
 - b) The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or 40 CFR 63 Subpart A, but must have records available within 24 hours of a request by the Administrator to document it's gasoline throughput [§63.11116(b)].
 - c) Portable gasoline containers that meet the requirements of 40 CFR 59 Subpart F, are considered acceptable for compliance with operational limit 1.(a)(3) [§63.11116(d)].

Monitoring:

None-See Statement of Basis

Recordkeeping:

The permittee shall maintain records to document monthly throughput. Records of fuel purchases will satisfy this requirement [§63.11111(e)].

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit, except that the primary recipient shall be EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with a copy to the Air Pollution Control Program.

PERMIT CONDITION 4	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Sources Installed After February 24, 1971	
Emission Unit	Description
Boil-1	Boilers (3) – MHDR 83.766 mmBTU natural gas

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%.
- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

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

Recordkeeping:

- 1) The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units;
 - b) All emission units from which visible emissions occurred;

- c) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- d) The permittee shall maintain records of all EPA Method 9 opacity tests performed.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after end of the month in which the permittee determines that the emission unit exceeded the opacity limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

PERMIT CONDITION 5	
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions	
Emission Unit	Description
Boil-1	Boilers (3) – MHDR 0.6725 1,000 gal fuel oil
FIREPRO-3	Diesel Fire Protection Pumps 2.4299 mmBTU/hr total

Note: this Permit Condition applies to Boil-1 only when using fuel oil.

Operational Limitations:

The permittee shall accept for delivery only ultra-low sulfur distillate fuel oil with a maximum fuel sulfur content of 15 parts per million for these emission units. [(3)(D)].

Monitoring/Record Keeping:

- 1) The permittee shall monitor compliance by keeping records of fuel delivery. [(3)(E)].
- 2) All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the emission unit exceeded the emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) 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) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess

emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall submit 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) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven

volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

following methods is presumptively credible evidence of whether a violation has occurred by a permittee:

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.

- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 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 annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

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

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

10 CSR 10-6.065(5)(C)1.A General Requirements

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

- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

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

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

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

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

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

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) 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,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

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

VI. Attachments

Attachments follow.

Attachment C

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

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____

YES NO Signature of Observer

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MW megawatt
acfm actual cubic feet per minute	MHDR maximum hourly design rate
BACT Best Available Control Technology	MMBtu Million British thermal units
BMPs Best Management Practices	MMCF million cubic feet
Btu British thermal unit	MSDS Material Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQS National Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs ... National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_x nitrogen oxides
CFR Code of Federal Regulations	NSPS New Source Performance Standards
CO carbon monoxide	NSR New Source Review
CO₂ carbon dioxide	PM particulate matter
CO₂e carbon dioxide equivalent	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppm parts per million
dscf dry standard cubic feet	PSD Prevention of Significant Deterioration
EQ Emission Inventory Questionnaire	PTE potential to emit
EP Emission Point	RACT Reasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCC Source Classification Code
fps feet per second	scfm standard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SIC Standard Industrial Classification
GHG Greenhouse Gas	SIP State Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_x sulfur oxides
GWP Global Warming Potential	SO₂ sulfur dioxide
HAP Hazardous Air Pollutant	tph tons per hour
hr hour	tpy tons per year
hp horsepower	VMT vehicle miles traveled
lb pound	VOC Volatile Organic Compound
lbs/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received April 14, 2014;
- 2) 2014 Emissions Inventory Questionnaire, received February 23, 2014;
- 3) WebFIRE and
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not 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 10-6.400 - *Restriction of Emission of Particulate Matter from Industrial Processes* – this regulation applies to emission units that emit particulate matter. The only sources of particulate matter are boilers which are used for indirect heating. Therefore, this rule does not apply under 10 CSR 10-6.400(1)(B)6.

10 CSR 10-6.405 - *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating* – this regulation applies to emission units that burn fuel for the primary purpose of producing steam, hot water, or hot air and in which the products of combustion do not come into contact

with the process materials.. The boilers at this installation use natural gas, with fuel oil as a back-up. Therefore, this rule does not apply under 10 CSR 10-6.405(1)(B).

Construction Permit History

None

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subparts K, Ka, Kb *Standards of Performance for Storage Vessels for Petroleum Liquids* is not applicable. The four diesel storage tanks for fire protection, FIREPRO-2, were installed in 1971 prior to all regulatory dates. The other petroleum liquid storage tanks, BOIL-2, MSCTNKS-1, MSCTNKS-2, and MSCTNKS-3, are all less than the minimum threshold of 75 m³ (19,812 gallons).

40 CFR Part 60 Subpart IIII *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is not applicable. The fire pump engines, FIREPRO-3, were installed in 1971, prior to the regulatory dates. The natural gas back up generator, BLDGMSC-1, was also installed in 1971, prior to the regulatory date.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart T *National Emission Standards for Halogenated Solvent Cleaning* is not applicable as long as the facility continues to use materials such as Ultra Solv 221 which do not contain any of the halogenated solvents regulated by the MACT.

40 CFR Part 63 Subpart ZZZZ *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is not applicable. The fire pump engines, FIREPRO-3, qualify as existing emergency RICE [§63.6585(f)(2)]. They meet all necessary requirements for emergency engines. Permit Condition 2 contains the requirements for emergency engines.

40 CFR Part 63 Subpart CCCCCC – *National Emissions Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities* – this rule applies to gasoline dispensing facilities. Because the monthly throughput for MSCTNKS-1 is less than 10,000 gallons, the only requirements are those listed in Permit Condition 3.

40 CFR Part 63 Subpart JJJJJJ – *National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers* – this rule applies to oil-fired boilers at area sources of HAPs. The installation's three boilers (BOIL-1) are capable of using fuel oil as a back-up fuel, but primarily use natural gas. Gas-fired boilers are exempt under §63.11195(e). Therefore, Subpart JJJJJJ is not applied in this permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's

operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
PM ₁₀	9.78
PM _{2.5}	7.57
SO _x	31.47
NO _x	110.24
VOC	36.34
CO	47.94
HAP	0.67

¹ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation, except for the diesel fire protection pumps and backup generator, which were evaluated at 500 hours.

Other Regulatory Determinations

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels are exempt from the requirements of these rules [(1)(A)(2) and (1)(A)]. BOIL-1 and BLDGMSC-1 use only natural gas.

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

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

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

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

Response to Public Comments

A draft of the Intermediate Operating Permit for Liberty Distribution Center Hallmark Cards, Inc. was placed on public notice on May 27, 2016, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Mark A. Smith of Region VII of the Environmental Protection Agency. The three comments are addressed in the order in which they appear within the letter.

Comment #: 1

Based on a NAICS code of 493110, Liberty Distribution Center Hallmark Cards, Inc. is considered to be a “commercial” facility for purposes of the classification of their emergency stationary RICE. Therefore, the RICE rule (40 CFR part 63, Subpart ZZZZ) does not apply; however, the engine must meet the Subpart ZZZZ operational requirements found in 40 CFR 63.6640(f). These operational requirements might be considered applicable requirements and as such should be captured in the operating permit. EPA suggests that MDNR add a permit condition to the Liberty Distribution Center Hallmark Cards, Inc. operating permit incorporating the applicable Subpart ZZZZ emergency engine operational requirements, similar to permit conditions MDNR has included in the draft operating permit for many other sources with emergency engines which includes:

- Unlimited use for emergencies (e.g. power outage, fire, flood)
- Emergency engines may operate for 100 hr/yr for any combination of the following:
 1. maintenance/testing;
 2. emergency demand response (in situations when a blackout is imminent – either the reliability coordinator has declared an Energy Emergency Alert Level 2 as defined in the North American Reliability Corporation (NERC) Reliability Standard; or there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency);
 3. 50 hr/yr of the 100 hr/yr can be used for :
 1. non-emergency situations if no financial arrangement
 2. local reliability as part of a financial arrangement with another entity if specific criteria met (existing RICE at area sources of HAP only)
 3. peak shaving until May 3, 2014 (existing RICE at area sources of HAP only) if part of a peak shaving (load management) program with the local distribution system operator and the power is provided only to the facility or to support the local distribution system.

Response to Comment:

A permit condition was added for the requirements of Subpart ZZZZ for emergency engines as noted in the comment except for the sections vacated by the D.C. Court of Appeals on May 1, 2015.

Comment #: 2

Permit Condition 2 incorporates the Maximum Achievable Control Technology (MACT) Regulations for Gasoline Dispensing Facilities which is an area MACT and MDNR relies on EPA to be the regulating agency. Therefore, the reporting requirements in Permit Condition 2 should be reflect that EPA is the receiving agency and not MDNR, as required by Section V in

the operating permit. Also, MDNR relies on the EPA to be the regulating agency for the area source RICE regulations. So, the reporting requirements associated with the emergency engines, in above comment, should reflect EPA as the lead recipient and MDNR receiving copies as needed.

Response to Comment:

The Reporting requirements for Permit Conditions 2 and 3 were changed to Region VII as the primary recipient.

Comment #: 3

Finally, Permit Condition 2 refers to the Statement of Basis for the monitoring discussion and the Statement of Basis says “Because the monthly throughput for MSCTNKS-1 is less than 10,000 gallons, the only requirements are those listed in Permit Condition 6.” However, there is no Permit Condition 6, so MDNR needs to correct the Statement of Basis. Additionally, there is a typo in the second line of operational limitation b) in Permit Condition 2. The reference to 40 CFR 63 Subpart At should be Subpart A.

Response to Comment:

The Statement of Basis was corrected to refer to the correct Permit Condition. The typographical error was corrected.

Public Notice Email to Applicant

Use the following text for the body of the public notice email. Include a pdf of the draft permit. The subject line should read –

**Draft Intermediate Operating Permit for Liberty Distribution Center Hallmark Cards, Inc.,
Project No. 2014-04-025**

The Air Pollution Control Program (APCP) has completed the preliminary review of your Intermediate operating permit. We are placing a public notice draft permit on the Department's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. The public notice period will start on May 27, 2016, and will last for 30 calendar days.

We will accept comments regarding the draft permit postmarked on or before the closing date. It is very important that you read and understand this legal document. It is your responsibility to comply with this document. Please address comments or recommendations for changes to Michael Stansfield, P.E., Operating Permits Unit, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

We are sending a copy of this draft to the U.S. EPA's Region VII office in Lenexa, Kansas, for their review. Your Intermediate State Operating Permit will become a part of the Missouri State Implementation Plan, and as such, federally enforceable. We may hold a public hearing if the public requests one.

Should you have any questions, or wish clarification on any items in this draft permit, please contact Michael Stansfield at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention.

Public Notice Email to Affected States and Indian Tribes

Use the following text for the body of the public notice email. The subject line should read –

Affected States Review for Liberty Distribution Center Hallmark Cards, Inc.

In accordance with Missouri State Rule 10 CSR 10-6.065(6)(F)2. and the Clean Air Act this email is to notify you of public notice of the preliminary draft and request for comments for:

Liberty Distribution Center Hallmark Cards, Inc., located in Liberty, MO 64068

Project Number – 2014-04-025

A public notice draft permit will be available on the Department's web page no later than May 27, 2016, at: <http://www.dnr.mo.gov/env/apcp/permit-public-notices.htm>. The public notice period will start on November 25, 2014, and will last for 30 calendar days.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits by no later than June 27, 2016, to the attention of Michael J. Stansfield, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Comments may be emailed to apcppermitssp@dnr.mo.gov

Should you require further information or documentation on this matter, please contact the Operating Permits Unit 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. Thank you for your time and attention.

Mr. Gregory Scott O'Dell
Liberty Distribution Center Hallmark Cards, Inc.
2101 N. Lightburne
Liberty, MO 64068

Re: Liberty Distribution Center Hallmark Cards, Inc.
Facility ID: 047-0059, Permit Number: OP2106-023

Dear Mr. O'Dell:

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

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please 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/bjj

Enclosures

c: PAMS File: 2014-04-025