



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 here in.

Intermediate Operating Permit Number: OP2009-029
Expiration Date: OCT 27 2014
Installation ID: 021-0046
Project Number: 2007-03-079

Installation Name and Address

International Paper
4725 Easton Road
St. Joseph, MO 64503
Buchanan County

Parent Company's Name and Address

International Paper
6400 Poplar Avenue
Hot Springs, TN 38197

Installation Description:

International Paper manufactures corrugated packaging containers and is located in St. Joseph, Missouri (Buchanan County). Bulk starch and other compounds are mixed to form an adhesive. A 98" wide Marquip, Ward, United Corrugator (EP04) and the mixed adhesive are then used to convert the paper into corrugated boxes. After the corrugated boxes are created they go to a printing operation and are printed according to customer specifications. 500 and 400 HP Cleaver Brooks Firetube boilers (EP01 and EP08) are used for industrial steam generation. The two (2) boilers use natural gas as the primary fuel and distillate fuel oil as a backup.

OCT 28 2009

Effective Date

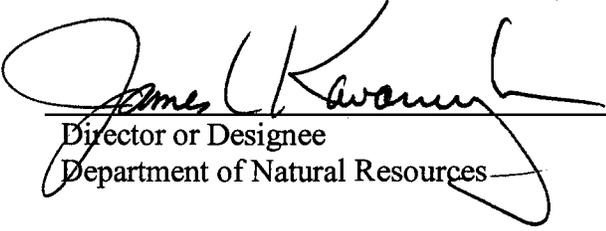

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

International Paper manufactures corrugated packaging containers and is located in St. Joseph, Missouri (Buchanan County). Bulk starch and other compounds are mixed to form an adhesive. A 98" wide Marquip, Ward, United Corrugator (EP04) and the mixed adhesive are then used to convert the paper into corrugated boxes. After the corrugated boxes are created they go to a printing operation and are printed according to customer specifications. 500 and 400 HP Cleaver Brooks Firetube boilers (EP01 and EP08) are used for industrial steam generation. The two (2) boilers use natural gas as the primary fuel and distillate fuel oil as a backup.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	2.37	0.03	5.06	2.32	4.25	--	0.20
2007	8.61	0.03	4.22	11.18	3.54	--	0.86
2006	7.26	0.03	4.63	15.38	3.89	--	0.91
2005	7.17	0.03	5.05	14.42	4.24	--	1.06
2004	7.32	0.03	5.37	15.38	4.51	--	--

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.

Emission Unit #	Description of Emission Unit
EU0010	16.70 MMBtu/hr Cleaver Brooks Natural Gas and Fuel Oil Boiler (EP01)
EU0020	Cyclone Separator (EP02)
EU0030	Printing – Converting Process (EP03)
EU0040	98" Marquip, Ward, United Corrugator (EP04)
EU0080	20.92 MMBtu/hr Cleaver Brooks Natural Gas and Fuel Oil Boiler (EP08)

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.

Description of Emission Source
Adhesive Solvent Mixing (EP05)
Die Prep (EP06)
General Cleanup (EP07)

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

1. Construction Permit 0693-022
2. Construction Permit 092002-020

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.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

1. The permittee shall discharge into the atmosphere from the entire installation less than 100 tons of sulfur dioxide (SO₂) in any consecutive 12-month period.
2. The permittee shall comply with the following limitation to ensure that SO₂ emissions do not exceed 100 tons per year:
 - a) Fuel oil combusted in the boilers (EU0010 and EU0080) shall not exceed a sulfur content of 0.5 percent by weight.

Recordkeeping Requirement:

1. The permittee shall maintain records showing the sulfur content in percent by weight of all fuel oil combusted in EU0010 and EU0080.
2. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment A).
3. The calculations and fuel records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting Requirement:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

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.

EU0010 – BOILER			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0010	400 HP Dual Fuel (Natural Gas and Fuel Oil No.1 and No. 2) Cleaver Brooks Boiler, Installed 05/22/1984	CB400-400/L78386	EP01

<p>PERMIT CONDITION EU0010-001 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds</p>
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Emission Limitation:

1. No person shall cause or permit emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

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

Operational Limitation/Equipment Specifications:

The emission unit shall be limited to fuel with a sulfur content of no more than **0.5 percent sulfur by weight**.

Record Keeping:

1. The recordkeeping requirements prescribed in PW001 are adequate to show compliance with this requirement.
2. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment B).
3. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of the emission limit or sulfur content limit established by 10 CSR 10-6.260, or any malfunction which causes an exceedance.
2. The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

EU0020 – CYCLONE SEPARATOR	
Emission Unit	Description
EU0020	18' Diameter Ohio Blow Pipe Cyclone

EU0030 – PRINTING PROCESS	
Emission Unit	Description
EU0030	Printing – Converting Process

EU0040 – CORRUGATOR	
Emission Unit	Description
EU0040	98" Marquip, Ward, United Corrugator

PERMIT CONDITION (EU0020, EU0040)-001 10 CSR 10-6.060 Construction Permits Required Construction Permit 092002-020, Issued August 27, 2002

Emission Limitation:

International Paper shall not discharge into the atmosphere from the 98" wide Marquip, Ward, United Corrugator (EP04) and the Ohio Blow Pipe Cyclone (EP02) PM₁₀ in excess of 15 tons in any consecutive 12-month period.

Recordkeeping:

International Paper shall maintain monthly records of PM₁₀ emissions from these emission units. Attachment C, D, and E or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. International Paper shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. International Paper shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records indicate that the source exceeds the emission limitation of this permit condition.
2. The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

PERMIT CONDITION (EU0030, EU0040)-001
10 CSR 10-6.060 Construction Permits Required
Construction Permit 092002-020, Issued August 27, 2002

Emission Limitation:

International Paper shall control emissions from the printing-converting and the corrugator operation (EP03 and EP04, respectively) using the cyclone separator as specified in the application for construction permit 092002-020. The cyclone separator shall be operated and maintained in accordance with the manufacturer's specifications.

Recordkeeping:

1. International Paper shall maintain an operating and maintenance log for the cyclone separator which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions; and replacements, etc.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

EU0080 – BOILER			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0080	500 HP Dual Fuel (Natural Gas and Fuel Oil No. 1 and No. 2) Cleaver Brooks Boiler, Installed 03/08/1993	CB200-500/L91749	EP08

PERMIT CONDITION EU0080-001

40 CFR Part 60, Subpart A General Provisions and Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Emission Limitation [§60.42c]:

1. On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts

oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than **0.5 weight percent sulfur**. [§60.42c(d)]

2. For affected facilities listed under paragraphs (1), (2), or (3) below, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable. [§60.42c(h)]
 - a) **Distillate oil-fired** affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr). [§60.42c(h)(1)]
 - b) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr). [§60.42c(h)(2)]
 - c) Coal-fired facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr). [§60.42c(h)(3)]
3. The fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction. [§60.42c(i)]

Performance Tests [60.44c]:

For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable. [§60.44c(h)]

Monitoring [60.46c]:

The monitoring requirements of paragraphs (a) and (d) of §60.46c shall not apply to affected facilities where the owner or operator of the affected facility seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, as described under §60.48c(f), as applicable. [§60.46c(e)].

Record Keeping [§60.48c]:

1. The owner or operator of each affected facility subject to the fuel oil sulfur limits requirements under §60.42c shall keep records and submit reports including the following information, as applicable. [§60.48c(e)]
 - a) Calendar dates covered in the reporting period. [§60.48c(e)(1)]
 - b) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described below, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. [§60.48c(e)(11)]
2. Fuel supplier certification shall include the following information: [§60.48c(f)]
 - a) For distillate oil: [§60.48c(f)(1)]
 1. The name of the oil supplier; [§60.48c(f)(1)(i)]
 2. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and [§60.48c(f)(1)(ii)]
 3. The sulfur content or maximum sulfur content of the oil. [§60.48c(f)(1)(iii)]
3. Maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]
4. All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

Reporting [§60.48c]:

1. The owner or operator of each affected facility subject to the fuel oil sulfur limits requirements under §60.42c shall submit reports to the Administrator. [§60.48c(d)]
2. The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

PERMIT CONDITION (EU0010, EU0080) - 001

10 CSR 10-2.040 Maximum Allowable Emissions of Particulate Matter From Fuel Burning
Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.26 pounds per million BTU of heat input for EU0010 or EU0080.

Operational Limitation/Equipment Specifications:

EU0010 and EU0080 shall be limited to burning pipeline grade natural gas and fuel oils No. 1 and No. 2 with a sulfur content of less than 0.5 percent by weight.

Recordkeeping Requirement:

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment F).
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting Requirement:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

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.

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 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.

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 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;

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

- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-2.070 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 10-6.080 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business
Exemption Requirements**

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.

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

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1 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's 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. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 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 June 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This 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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Thayne Ramsey, **Site 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) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(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 A
Sulfur Dioxide Emission Calculations (PW001)

This attachment presents calculations that show the basis for the plant-wide limitation on fuel oil combustion at the installation to ensure that site-wide SO₂ emissions do not exceed 100 tons per year. Sulfur dioxide is emitted from combustion of natural gas and fuel oil in the boilers; however, the combustion of fuel oil is the limiting fuel for SO₂ emissions in this case.

Input Values

Total Boiler Heat Input Capacity = [16.70 + 20.92] MMBtu/hr = 37.62 MMBtu/hr

Heating value of #2 fuel oil = 140,000 Btu/gallon

Fuel oil sulfur content is **maximum of 0.5%** by weight

Fuel oil combustion SO₂ emission factor, from AP-42 Table 1.3-1 = 142S lb/1000 gallons, where S is the fuel oil sulfur content by weight percent

Boilers

Assuming continuous, year-round fuel oil combustion (0.5% sulfur), the boilers' SO₂ PTE is:

$$37.62 \text{ MMBtu/hr} \times 1 \text{ gallon/140,000 Btu} \times 10^6 \text{ Btu/MMBtu} = 269 \text{ gallons/hr}$$

$$269 \text{ gal/hr} \times 142(0.5)\text{lb SO}_2/1000 \text{ gal} \times 8760 \text{ hr/yr} \times 1 \text{ ton/2000 lb} = \mathbf{83.7} \text{ tons/yr}$$

ATTACHMENT B
Sulfur Dioxide Emission Calculations (EU0010-001)

This attachment presents calculations that show the basis for the emission unit limitation on fuel oil combustion at the installation to ensure that site-wide SO₂ emissions do not exceed 8 lb/MMBtu. Sulfur dioxide is emitted from combustion of natural gas and fuel oil in EU0010, however, the combustion of fuel oil is the limiting fuel for SO₂ emissions in this case.

Input Values

EU0010 Heat Input Capacity = 16.70 MMBtu/hr

Heating value of #2 fuel oil = 140,000 Btu/gallon

Fuel oil sulfur content is **maximum of 0.5%** by weight

Fuel oil combustion SO₂ emission factor, from AP-42 Table 1.3-1 = 142S lb/1000 gallons, where S is the fuel oil sulfur content by weight percent

Boilers

Assuming continuous, year-round fuel oil combustion (0.5% sulfur), EU0010 SO₂ emission **limit** is:

$$8 \text{ lb/MMBtu} \times 16.70 \text{ MMBtu/hr} \times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lb} = \mathbf{585 \text{ ton/yr}}$$

Assuming continuous, year-round fuel oil combustion (0.5% sulfur), EU0010 SO₂ **PTE** is:

$$16.70 \text{ MMBtu/hr} \times 1 \text{ gallon}/140,000 \text{ Btu} \times 10^6 \text{ Btu/MMBtu} = 119 \text{ gallons/hr}$$

$$119 \text{ gal/hr} \times 142(0.5) \text{ lb SO}_2/1000 \text{ gal} \times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lb} = \mathbf{37.1 \text{ tons/yr}}$$

The limit prescribed in PW001 on sulfur content of the fuel oil also demonstrates compliance, as shown above, with Emission Unit Specific Limitation EU0010-001

ATTACHMENT F

This record keeping sheet or an equivalent sheet may be used to meet the record keeping requirements for Permit Condition (EU0010, EU0080)-001.

Equipment	Heat Input (mmBtu/hr)
EU0010	16.70
EU0080	20.92
Total Heat Input (Q)	37.62

$$\text{Emissions Limit} = 0.80(Q)^{-0.301} = 0.80(37.62)^{-0.301} = 0.27$$

The following table demonstrates compliance with the emission limit:

Potential Emission Rate (lb/mmBtu) = MHDR * PM Emission Factor / Heat Capacity

Emission Unit	Heat Capacity	Maximum Hourly Design Rate*	PM Emission Factor	Emission Factor Reference	Potential Emission Rate (lb/MMBtu)	Emission Rate Limit (lb/MMBtu)
EU0010	16.70 MMBtu/hr	0.016 MMft ³ /hr	7.6 lb/MMft ³	AP42 Table 1.4-2	0.0073	0.27
EU0010	16.70 MMBtu/hr	0.119 1,000 gal/hr	1.0 lb/1,000 gal	AP42 Table 1.3-1	0.0071	0.27
EU0080	20.92 MMBtu/hr	0.020 MMft ³ /hr	7.6 lb/MMft ³	AP42 Table 1.4-2	0.0073	0.27
EU0080	20.92 MMBtu/hr	0.149 1,000 gal/hr	1.0 lb/ 1,000 gal	AP42 Table 1.3-1	0.0072	0.27

* Heat capacity divided by heating value of fuel; 1050 MMBtu/MMft³ for natural gas, 140 MMBtu/1000gal for fuel oil #2 (AP-42)

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 March 13, 2007;
- 2) 2007 Emissions Inventory Questionnaire; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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 10-2.215, Control of Emissions from Solvent Cleanup Operations

This rule is not applicable per 10 CSR 10-2.215(1)(A) because the facility is not located in Clay, Jackson, or Platte counties.

10 CSR 10-2.290, Control of Emissions From Rotogravure and Flexographic Printing Facilities

This rule is not applicable per 10 CSR 10-2.290(1)(A) because the facility is not located in Clay, Jackson, or Platte counties.

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations

The SIC for International Paper is 2653. They are not subject to MACT regulations because they are not a major source of Hazardous Air Pollutants (HAPs).

10 CSR 10-6.100, Alternate Emission Limits

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

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

This rule is not applicable to EU0080 because EU0080 is subject to 40 CFR Part 60, Subpart Dc and thus meets exemption 10 CSR 10-6.260(1)(A)1.

10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes

This rule does not apply to the EU0010 and EU0080 because they burn fuel used for indirect heating which is exempted from this regulation per 10-6.400(1)(B)6. This rule does not apply to EU0030, 0050, 0060, and 0070 because these are fugitive sources of PM emissions and meet exemption 10-6.400(1)(B)7. This rule does not apply to EU0020 and EU0040 because they were shown in Construction Permit 092002-020 to have an uncontrolled potential to emit less than the allowable emissions as calculated in paragraphs (3)(A)1. and (3)(A)2. of 10-6.400 and meet exemption 10-6.400(1)(B)16.

40 CFR Part 63, Subpart KK, *National Emission Standards for the Printing and Publishing Industry*

International Paper is not a major source of HAPs and therefore is not subject to this rule.

Construction Permit Revisions

Construction Permit 0693-022, Applicable Emission Rules:

The Applicable Emission Rules section of construction permit 0693-022 states that International Paper is subject to 10 CSR 10-2.060, *Restriction of Emission of Visible Air Contaminants*. 10 CSR 10-2.060 was rescinded May 30, 2000, and replaced with 10 CSR 10-6.220.

Construction Permit 0693-022, Applicable Emission Rules:

The Applicable Emission Rules section of construction permit 0693-022 states that International Paper is subject to 10 CSR 10-2.200, *Restriction of Emission of Sulfur Compounds From Indirect Heating Sources*. 10 CSR 10-2.200 was rescinded July 30, 1997, and replaced with 10 CSR 10-6.260.

Construction Permit 092002-020, Applicable Requirements I. B.Odors:

Section I.B.Odors states that International Paper is subject to 10 CSR 10-3.090 *Restriction of Emission of Odors*. International Paper is not subject to 10 CSR 10-3.090, but is subject to 10 CSR 10-2.070 *Restriction of Emission of Odors* because the facility is located in the Kansas City Metropolitan Area by definition per 10 CSR 10-6.020.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is applicable to EU0080.

Maximum Available Control Technology (MACT) Applicability

None.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Other Regulatory Determinations

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

Based upon engineering judgment, this regulation was not applied as it is highly unlikely that emission units at this facility would ever exceed the opacity requirements listed in the regulation.

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

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

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

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

Prepared by:

Jason Dickneite
Environmental Engineer

CERTIFIED MAIL: 70073020000315698821
RETURN RECEIPT REQUESTED

Mr. Thayne Ramsey
International Paper
4725 Easton Road
St. Joseph, MO 64503

Re: International Paper, 021-0046
Permit Number: OP2009-029

Dear Mr. Ramsey:

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.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Jason Dickneite 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 to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/jdk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
Kansas City Regional Office
PAMS File: 2007-03-079