PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2018-072
Expiration Date: AUG 07 2023
Installation ID: 095-0272
Project Number: 2015-01-001

Installation Name and Address
Lee's Summit Resource Recovery Park
2101 SE Hamblen Road
Lee's Summit, MO 64082
Jackson County

Installation Description:
Lee’s Summit Resource Recovery Park operates a municipal solid waste landfill in Lee’s Summit. The landfill began accepting waste in 1981, and received various expansions over time for a current landfill mass covering approximately 81 acres with an estimated capacity of 6.99 million cubic yards (cy), 2.75 million Mg of waste. The landfill includes both Subtitle D and preSubtitle D areas with approximately 11 acres permitted as a Subtitle D disposal area and 70.2 acres as a preSubtitle D area. The Subtitle D portion of the landfill has been in operation since 1996. A gas collection and control system with an open flare is used to control landfill gas migration. The landfill is subject to 40 CFR part 60 Subparts WWW and XXX. The installation is required to obtain a Part 70 Operating Permit due to the requirements of these subparts.

Prepared by
Nicole Weidenbenner, PE
Operating Permit Unit

Director or Designee
Department of Natural Resources
AUG 07 2018
Effective Date
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I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-02</td>
<td>Municipal Solid Waste Landfill</td>
</tr>
<tr>
<td>EP-03</td>
<td>800 SCFM Landfill Gas Open Flare</td>
</tr>
<tr>
<td>EP-06</td>
<td>Rock Crusher Storage Piles (2)</td>
</tr>
<tr>
<td>EP-07A</td>
<td>Haul Roads-Rock Crusher Receiving</td>
</tr>
<tr>
<td>EP-07B</td>
<td>Haul Roads-Outgoing crushed rock</td>
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<tr>
<td>EP-10</td>
<td>Organic Waste Storage Piles (4)</td>
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<tr>
<td>EP-12</td>
<td>Mulch Storage Pile</td>
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<tr>
<td>EP-13C</td>
<td>Haul Roads-Outgoing Mulch</td>
</tr>
<tr>
<td>EP-14</td>
<td>Rock Crusher</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01A</td>
<td>Waste Haul Road-Waste Hauling</td>
</tr>
<tr>
<td>EP-01B</td>
<td>Waste Haul Road-Borrow Soil Hauling</td>
</tr>
<tr>
<td>EP-04</td>
<td>Haul Road for Borrow Area</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. This section applies to regulations that apply on an entire-installation wide basis. The following general conditions apply to all units contained in this permit, unless stated otherwise.

**Monitoring:**
The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer’s recommendations, or maintenance and operational history of similar units. All calibrations, maintenance, and operations shall occur according to good engineering practices. All manufacturing specifications and operational/maintenance histories shall be kept on site.

**Recordkeeping:**
1. The permittee shall record all required record keeping in an appropriate format.
2. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
3. The permittee shall keep a copy of this operating permit and review, copies of all issued construction permits and reviews, and copies of all Safety Data Sheets (SDS) on site.
4. All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

**Performance Testing:**
When performance testing is required by a condition of this permit, one electronic copy of a written report of the performance test results shall be submitted to stacktesting@dnr.mo.gov within the timeframe required by the regulation that requires the testing. If no time frame is specified, the report shall be submitted within sixty days. The report shall include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.

**Reporting:**
1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
III. Emission Unit Specific Emission Limitations

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

### Permit Condition WWW

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<tr>
<td>EP-02</td>
<td>Municipal Solid Waste Landfill</td>
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</table>

**Emission Limitations:**
The permittee shall calculate an NMOC emission rate for the landfill using the procedures specified in §60.754. The NMOC emission rate shall be recalculated annually, except as provided in §60.757(b)(1)(ii). [§60.752(b)]

1. If the calculated NMOC emission rate is less than 50 megagrams per year, the permittee shall:
   
   a. Submit an annual emission report to the director, except as provided for in §60.757(b)(1)(ii); and [§60.752(b)(1)]
   
   b. Recalculate the NMOC emission rate annually using the procedures specified in §60.754(a)(1) until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, or the landfill is closed. [§60.752(b)(1)(ii)]

**Test Methods and Procedures:**

1. The permittee shall calculate NMOC emission rates according to the following procedures.
   
   a. The permittee shall calculate the NMOC emission rate using either the equation provided in §60.754(a)(1)(i) or the equation provided in §60.754(a)(1)(ii). [§60.754(a)(1)]
   
   b. If conducting Tier 1 testing, the permittee shall conduct the testing in compliance with §60.754(a)(2).
   
   c. If conducting Tier 2 testing, the permittee shall conduct the testing in compliance with §60.754(a)(3).

2. When calculating emissions for PSD purposes, the permittee shall estimate the NMOC emission rate for comparison to the PSD major source and significance levels in §§51.166 or 52.21 of this chapter using AP-42 or other approved measurement procedures. [§60.754(c)]

**Reporting:**

1. The permittee shall submit an NMOC emission rate report to the director annually, except as provided for in §60.757(b)(1)(ii). The director may request such additional information as may be necessary to verify the reported NMOC emission rate. [§60.757(b)]
   
   a. The NMOC emission rate report shall contain an annual or 5-year estimate of the NMOC emission rate calculated using the formula and procedures provided in §60.754(a) or (b), as applicable. [§60.757(b)(1)]
      
   i. Subsequent NMOC emission rate reports shall be submitted annually, except as provided for in §60.757(b)(1)(ii). [§60.757(b)(1)(i)]
ii. If the estimated NMOC emission rate as reported in the annual report to the director is less than 50 megagrams per year in each of the next 5 consecutive years, the permittee may elect to submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to the director. This estimate shall be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate shall be submitted to the director. The revised estimate shall cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate. [§60.757(b)(1)(ii)]

b. The NMOC emission rate report shall include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions. [§60.757(b)(2)]

Recordkeeping:
The permittee shall keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report which triggered §60.752(b), the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. [§60.758(a)]

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</table>

Emission Limitations:
1. The permittee must calculate an NMOC emission rate for the landfill using the procedures specified in §60.764. The NMOC emission rate must be recalculated annually, except as provided in §60.767(b)(1)(i).
   a. If the calculated NMOC emission rate is less than 34 megagrams per year, the permittee must: [§60.672(b)(1)]
      i. Submit an annual NMOC emission rate emission report to the Administrator, except as provided for in §60.767(b)(1)(i); and [§60.672(b)(1)]
   ii. Recalculate the NMOC emission rate annually using the procedures specified in §60.764(a)(1) until such time as the calculated NMOC emission rate is equal to or greater than 34 megagrams per year, or the landfill is closed. [§60.672(b)(1)]
   A. If the calculated NMOC emission rate, upon initial calculation or annual recalculation required in §60.672(b), is equal to or greater than 34 megagrams per year, the permittee must either: Comply with §60.762(b)(2); calculate NMOC emissions using the next higher tier in §60.764; or conduct a surface emission monitoring demonstration using the procedures specified in §60.764(a)(6). [§60.672(b)(1)(i)(A)]
   B. If the landfill is permanently closed, a closure report must be submitted to the Administrator as provided for in §60.767(e). [§60.672(b)(1)(i)(B)]
2. Upon closure, the permittee is no longer subject to the requirement to maintain an operating permit under part 70 of this chapter for the landfill if the landfill is not otherwise subject to the requirements of either part 70 and if either of the following conditions are met: [§60.672(d)]
   a. The landfill was never subject to the requirement for a control system under §60.672(b)(2); or
   b. The permittee meets the conditions for control system removal specified in §60.672(b)(2)(v). [§60.672(d)(2)]

**Test Methods and Procedures:**
1. The permittee shall calculate the NMOC emission rates using Equation 1 or 2 in compliance with the provisions of §60.764(a)(1).
2. If conducting Tier 1 testing, the permittee must compare the calculated NMOC mass emission rate to the standard of 34 megagrams per year. [§60.764(a)(2)]
   a. If the NMOC emission rate calculated in §60.764(a)(1) is less than 34 megagrams per year, then the permittee must submit an NMOC emission rate report according to §60.767(b), and must recalculate the NMOC mass emission rate annually as required under §60.762(b). [§60.764(a)(2)(i)]
3. If conducting Tier 2 testing, the permittee shall comply with the provisions of §60.764(a)(3).
4. When calculating emissions for PSD purposes, the permittee must estimate the NMOC emission rate for comparison to the PSD major source and significance levels in §§51.166 or 52.21 of this chapter using AP-42 or other approved measurement procedures. [§60.764(c)]

**Reporting:**
1. The permittee must submit an NMOC emission rate report following the procedure specified in §60.767(i)(2) to the Administrator annually, except as provided for in §60.767(b)(1)(ii). The Administrator may request such additional information as may be necessary to verify the reported NMOC emission rate. [§60.767(b)]
   a. The NMOC emission rate report must contain an annual or 5-year estimate of the NMOC emission rate calculated using the formula and procedures provided in §60.764(a) or (b), as applicable. [§60.767(b)(1)]
      i. NMOC emission rate reports must be submitted annually, except as provided for in §60.767(b)(1)(ii). [§60.767(b)(1)(i)]
      ii. If the estimated NMOC emission rate as reported in the annual report to the Administrator is less than 34 megagrams per year in each of the next 5 consecutive years, the permittee may elect to submit, following the procedure specified in §60.767(i)(2), an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report. This estimate must include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based must be provided to the Administrator. This estimate must be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate must be submitted to the Administrator. The revised estimate must cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate. [§60.767(b)(1)(ii)]
   b. The NMOC emission rate report must include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions. [§60.767(b)(2)]
2. Each permittee required to submit reports following the procedure specified in this paragraph must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI Web site (https://www3.epa.gov/ttn/lchiep/cedri/index.html). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for 90 calendar days, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted. [§60.767(i)(2)]

**Recordkeeping:**

1. Any records required to be maintained by this subpart that are submitted electronically via the EPA’s CDX may be maintained in electronic format. [§60.768(i)]

<table>
<thead>
<tr>
<th>Permit Condition OOO</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.070 New Source Performance Regulations</td>
</tr>
<tr>
<td>40 CFR Part 60, Subpart OOO Standards of Performance for Nonmetallic Mineral Processing Plants</td>
</tr>
</tbody>
</table>

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<tr>
<th>EP #</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>EP-14</td>
<td>Rock Crusher, 300 ton/hr</td>
</tr>
</tbody>
</table>

**Emission Limitations:**

1. The permittee must meet the fugitive emission limits and compliance requirements in Table 3 of this subpart within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under §60.11. [§60.672(b)]

Table 3 to Subpart OOO of Part 60—Fugitive Emission Limits

<table>
<thead>
<tr>
<th>Affected facilities (as defined in §§60.670 and 60.671) that</th>
<th>The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility (as defined in §§60.670 and 60.671) * * *</th>
<th>The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used * * *</th>
<th>The owner or operator must demonstrate compliance with these limits by conducting * * *</th>
</tr>
</thead>
<tbody>
<tr>
<td>7 percent opacity</td>
<td>12 percent opacity</td>
<td>An initial performance test according to §60.11 of this part and §60.675 of this subpart; and Periodic inspections of water</td>
<td></td>
</tr>
</tbody>
</table>
Lee's Summit Resource Recovery Park
Part 70 Operating Permit
Installation ID: 095-0272

| commencement of construction, modification, or reconstruction on or after April 22, 2008 | sprays according to §60.674(b) and §60.676(b); and |
| A repeat performance test according to §60.11 of this part and §60.675 of this subpart within 5 years from the previous performance test for fugitive emissions from affected facilities without water sprays. Affected facilities controlled by water carryover from upstream water sprays that are inspected according to the requirements in §60.674(b) and §60.676(b) are exempt from this 5-year repeat testing requirement. |

**Monitoring:**
1. The permittee that uses wet suppression to control emissions from the affected facility must perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system. The permittee must initiate corrective action within 24 hours and complete corrective action as expeditiously as practical if the permittee finds that water is not flowing properly during an inspection of the water spray nozzles. The permittee must record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under §60.676(b). [§60.674(b)]
   a. If an affected facility that routinely uses wet suppression water sprays ceases operation of the water sprays or is using a control mechanism to reduce fugitive emissions other than water sprays during the monthly inspection (for example, water from recent rainfall), the logbook entry required under §60.676(b) must specify the control mechanism being used instead of the water sprays. [§60.674(b)(2)]

**Test Methods and Procedures:**
1. When determining compliance with the particulate matter standards in §60.672(b) or §60.672(e)(1), the permittee shall use Method 9 of appendix A-4 of this part and the procedures in §60.11, with the following additions: [§60.675(c)(1)]
   a. The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet). [§60.675(c)(1)(i)]
   b. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9 of appendix A-4 of this part, Section 2.1) must be followed. [§60.675(c)(1)(ii)]
   c. For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is
...present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible. [§60.675(c)(1)(iii)]

2. When determining compliance with the fugitive emissions standard for any affected facility described under §60.672(b) or §60.672(e)(1) of this subpart, the duration of the Method 9 (40 CFR part 60, appendix A-4) observations must be 30 minutes (five 6-minute averages). Compliance with the applicable fugitive emission limits in Table 3 of this subpart must be based on the average of the five 6-minute averages. [§60.675(c)(3)]

3. For performance tests involving only Method 9 (40 CFR part 60 appendix A-4) testing, the permittee may reduce the 30-day advance notification of performance test in §60.7(a)(6) and 60.8(d) to a 7-day advance notification. [§60.675(g)]

4. If the initial performance test date for an affected facility falls during a seasonal shut down (as defined in §60.671 of this subpart) of the affected facility, then with approval from the permitting authority, the permittee may postpone the initial performance test until no later than 60 calendar days after resuming operation of the affected facility. [§60.675(g)]

**Reporting/Recordkeeping:**

1. Permittees of affected facilities (as defined in §§60.670 and 60.671) for which construction, modification, or reconstruction commenced on or after April 22, 2008, must record each periodic inspection required under §60.674(b) or (c), including dates and any corrective actions taken, in a logbook (in written or electronic format). The permittee must keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the director upon request. [§60.676(b)(1)]

2. The permittee of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in §60.672 of this subpart, including reports of opacity observations made using Method 9 (40 CFR part 60, appendix A-4) to demonstrate compliance with §60.672(b), (e) and (f). [§60.676(f)]

3. A notification of the actual date of initial startup of each affected facility shall be submitted to the director. [§60.676(i)]

**Permit Condition 112002-008**

10 CSR 10-6.060, Construction Permits Required

<table>
<thead>
<tr>
<th>EP #</th>
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<tbody>
<tr>
<td>EP-03</td>
<td>800 SCFM Landfill Gas Open Flare, John Zink, Installed 2002</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

1. Special Condition # 1.A.: The permittee shall not emit carbon monoxide from the open flare in excess of 100 tons in any consecutive 12 month period.

**Monitoring/Recordkeeping:**

None, see Statement of Basis.
**Permit Condition 012018-006**
10 CSR 10-6.060, Construction Permits Required
Construction Permit #02018-006, Issued January 29, 2018

<table>
<thead>
<tr>
<th>EP #</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>EP-06</td>
<td>Rock Crusher Storage Piles (2)</td>
</tr>
<tr>
<td>EP-07A</td>
<td>Haul Roads-Rock Crusher Receiving</td>
</tr>
<tr>
<td>EP-07B</td>
<td>Haul Roads-Outgoing crushed rock</td>
</tr>
<tr>
<td>EP-10</td>
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<td>Haul Roads-Outgoing Mulch</td>
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<td>EP-14</td>
<td>Rock Crusher, 300 ton/hr</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
1. Special Condition #2.A.: The permittee shall emit less than 10.0 tons of PM$_{2.5}$ in any consecutive 12-month period from the emission points listed above.

**Operational Limitation:**
1. Special Condition #3.A.: The permittee shall water haul roads whenever conditions exist which would cause visible fugitive emissions to enter the ambient air beyond the property boundary.
2. Special Condition #3.B.: The permittee may suspend watering when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the haul roads.

**Monitoring/Recordkeeping:**
1. Special Condition #2.B.: The permittee shall monitor and record the monthly and consecutive 12 month total PM$_{2.5}$ emissions. The permittee shall use Attachment 012018-006, or an equivalent, to demonstrate compliance.
2. The permittee shall monitor and record watering of the haul roads.

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

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Note: This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri’s State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP.

**Emission Limitations:**
1. The permittee shall not cause or permit the emission into the atmosphere gases containing more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide of more than thirty-five milligrams per cubic meter (35 mg/m$^3$) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.
Operational Limitations:
The permittee shall comply with Permit Condition 6.261.

Monitoring/Recordkeeping:
None, See Statement of Basis

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

<table>
<thead>
<tr>
<th>EP #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-14</td>
<td>Rock Crusher, 300 ton/hr</td>
</tr>
</tbody>
</table>

Note: This requirement is a State Only permit requirement.

Emission Limitation:
1. The permittee shall not use diesel fuel oil with a sulfur content greater than 15 ppm. [6.261(3)(D)]

Monitoring/Recordkeeping:
1. The permittee shall determine compliance using fuel delivery records. [6.261(3)(E)]
2. The permittee must maintain a record of fuel deliveries. [6.261(4)(A)]
3. The permittee must maintain the fuel supplier information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule: [6.261(4)(C)]
   a. The name, address, and contact information of the fuel supplier; [6.261(4)(C)(1)]
   b. The type of fuel; [6.261(4)(C)(2)]
   c. The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and [6.261(4)(C)(4)]
   d. The heating value of the fuel. [6.261(4)(C)(5)]
4. The permittee must furnish the director all data necessary to determine compliance status. [6.261(4)(G)]
IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information
1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as a spreadsheet file, can be submitted for approval by the director.

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors
This requirement is a State Only permit requirement.
No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven
volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation’s property boundary.

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

Emission Limitation:
1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

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

The permittee shall maintain the following monitoring schedule. Issuance of a renewal operating permit does not restart the 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 6.170, or its equivalent, noting the following:
1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether equipment malfunctions contributed to an exceedance.
3) Any violations and any corrective actions undertaken to correct the violation.

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

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

### 10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

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

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

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:  
a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.  
b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.  
c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.  
d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.  

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:  
a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.  
b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.  
c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.  
d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).  
e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.  
f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.  

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.  

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*
V. General Permit Requirements

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

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

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

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

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources’ personnel upon request.

2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
   i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

<table>
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<tr>
<th>10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)</th>
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<tbody>
<tr>
<td>If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.</td>
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<tr>
<th>10 CSR 10-6.065(6)(C)1.F Severability Clause</th>
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<tr>
<td>In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.</td>
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<tr>
<th>10 CSR 10-6.065(6)(C)1.G General Requirements</th>
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<tbody>
<tr>
<td>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.</td>
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<tr>
<td>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.</td>
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<tr>
<td>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.</td>
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<tr>
<td>4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.</td>
</tr>
<tr>
<td>5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.</td>
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</table>
10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

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

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

None

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

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd.,
Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.

a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.

b) The permit shield shall not apply to these changes.

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

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:

a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

d) The permit shield shall not apply to these changes.

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

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

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

This permit shall be reopened for cause if:

1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,

2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or

5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.
## Attachment 6.170
Fugitive Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>If visible emissions are present&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Cause</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Beyond Boundary</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No</td>
<td>Yes</td>
<td></td>
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</tr>
</tbody>
</table>
### Attachment 012018-006
PM$_{2.5}$ Emissions Worksheet

<table>
<thead>
<tr>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
<th>Column D</th>
<th>Column E</th>
<th>Column F</th>
<th>Column G</th>
<th>Column H 12-month PM$_{2.5}$ Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month</td>
<td>Rocks Crushed$^1$ (tons)</td>
<td>Rock Crushing Composite Emission Factor (lb/ton)</td>
<td>Yard Waste Received$^2$ (tons)</td>
<td>Composting/Mulching Composite Emission Factor (lb/ton)</td>
<td>Total Monthly PM$_{2.5}$ Emissions$^3$ (tons)</td>
<td>12-Month Total PM$_{2.5}$ Emissions$^4$ (tons)</td>
<td></td>
</tr>
<tr>
<td>Example</td>
<td>6,400</td>
<td>0.130</td>
<td>3,400</td>
<td>0.242</td>
<td>0.827</td>
<td>9.93</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.130</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.130</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.130</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>0.130</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Emission factors sourced from Construction Permit 012018-006.

1. Enter the total amount of rocks crushed in the given month.
2. Enter the total amount of yard waste received in the given month.
3. Calculate using the following equation: $[F] = ([B] \times [C]) + ([D] \times [E]) \div (2,000 \text{ lb/ton}).$
4. Calculate by adding the current value in $[F]$ to the previous 11 months' values in $[F]$.

A total of less than 10.0 tons of PM$_{2.5}$ per year is necessary for compliance with Permit Condition 012018-006.
STATEMENT OF BASIS

Installation Description
Lee's Summit Resource Recovery Park operates a municipal solid waste landfill in Lee's Summit. The landfill began accepting waste in 1981. In October 1991 the landfill underwent a permitted horizontal and vertical expansion approving the operation of the landfill covering approximately 81 acres with an estimated capacity of 6.322 million cubic yards (cy); 3.44 million megagrams (Mg) based on an estimated density of 1,200 pounds per cubic yard as provided in the 2007 revised design capacity report. The landfill was subsequently issued a second vertical expansion in 2017 increasing the capacity to 6.99 million cy. Although the 2017 expansion increased the permitted airspace of the landfill, the facility has achieved waste densities averaging 840 pounds per cubic yard; therefore, the capacity of the landfill in megagrams has not increased. Conversely, the facility anticipates reaching the design capacity of 6.99 million cy in 2019 with an estimated 2.75 million Mg of waste in-place.

The landfill includes both Subtitle D and pre-Subtitle D areas with approximately 11 acres permitted as a Subtitle D disposal area and 70.2 acres as a pre-Subtitle D area. The Subtitle D portion of the landfill has been in operation since 1996. A gas collection and control system with an open flare is used to control landfill gas migration. The landfill is subject to 40 CFR part 60 Subparts WWW and XXX. The installation is required to obtain a Part 70 Operating Permit due to the requirements of these subparts.

Lee's Summit Resource Recovery Park transferred operation of the landfill and ancillary facilities to Summit Waste Systems, LLC. Composting and mulching operations are contracted out to a separate installation, Organic Resource Management, Inc. (dba KC Compost). Summit Waste Systems, LLC rents a 300 ton per hour portable rock-crusher (EP-14) as needed to process onsite materials. Composting and mulching equipment is authorized to operate onsite under KC Compost under portable source permits. Summit Waste Systems, LLC stores and hauls the compost and mulch processed by KC Compost’s equipment. All emissions from the operations of these entities are contained within this permit.

Actual and Potential Emissions
The most recent five years of reported emissions and the installation’s potential to emit is shown in Table 1. For some pollutants, reported emissions are greater than the potential to emit. This is due to the inclusion of fugitive sources and the differences in the carbon monoxide emission factor.

Potential emissions were recalculated for this operating permit to reflect two operating scenarios and operating permit applicability for fugitive and portable sources. The landfill currently operates the flare on a voluntary basis, creating two operating scenarios for the landfill gas emissions: controlled and uncontrolled. All landfill gas emissions were based on emission factors in the draft AP42 Section 2.4, using the concentration values for waste in place after 1992, which covers the majority of the lifetime of the landfill. Emissions for controlled operations were based on the maximum hourly design rate of the flare, with an 85% capture efficiency assumed for the GCCS. The carbon monoxide flare emissions were calculated using an emission factor of 62.4 lb CO/MMCF of methane derived from the AP42 draft Section 2.4 background document. Reported flare emissions, and issued construction permits, use an emission factor of 750 lb CO/MMCF of methane based on the final AP42 Section 2.4.

Emissions from the haul roads, storage piles, and rock crushing operations are not included as they are fugitive. Because this installation is not on the List of Named Installations, fugitive emissions are not
included for operating permit purposes. Engine emissions from the rock crushing engine are also not included. The rock crusher is a portable unit. Starting with the definition in Clean Air Act (CAA) section 302(z), of a “stationary source” and following references and definitions through CAA section 216, CAA section 111, and 40 CFR part 1068.30; it is concluded that as long as these engines meet the definition of non-road engine in 1068.30, they are categorically excluded from the stationary source definition. To paraphrase, the applicable parts of 1068.30 that must be satisfied are that the engines must be portable/transportable (1068.30(1)(iii)) and must not remain on site for more than 12 consecutive months (1068.30(2)(iii)). 40 CFR Part 70.2 defines “potential to emit” as the maximum capacity of the stationary source to emit air pollutants. Since the non-road engines are excluded from the definition of stationary sources, their emissions are not included in the definition of potential to emit.

### Table 1: Emissions Profile, tons per year

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Reported Emissions</th>
<th>Potential Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM$_{10}$)</td>
<td>2.94</td>
<td>2.10</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM$_{2.5}$)</td>
<td>0.61</td>
<td>0.54</td>
</tr>
<tr>
<td>Sulfur Oxides (SO$_x$)</td>
<td>0.29</td>
<td>0.31</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO$_x$)</td>
<td>0.84</td>
<td>0.87</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>4.02</td>
<td>4.02</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>15.68</td>
<td>16.37</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>0.66</td>
<td>0.66</td>
</tr>
</tbody>
</table>

The installation reports HAPs as PM or VOC as described in 10 CSR 10-6.110.

**Operating Permit Applicability**

This installation is required to obtain a P70 Operating Permit due to the applicable requirements of 40 CFR part 60 Subparts WWW and XXX. Both subparts require landfills with capacities greater than 2.5 million Megagrams and 2.5 million cubic meters to obtain Part 70 Operating Permits. It is anticipated that during the lifetime of this permit, the landfill will not become subject to the requirements to install controls under either of these subparts and will cease accepting waste.

Subpart WWW contains provisions for this scenario in §60.752(d), while Subpart XXX contains them in §60.672(d). These standards contain identical provisions for this scenario, which state that upon closure, the landfill is no longer subject to the requirements to obtain a Part 70 Operating Permit. At that time, the operating permit applicability will rely solely on the potential emissions of the installation. The permittee is encouraged to request an operating permit determination when the provisions of §60.752(d) and §60.672(d) have been satisfied.
Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1. Part 70 Operating Permit Application, received January 2, 2015;
2. 2016 Emissions Inventory Questionnaire, received April 28, 2017;
4. webFIRE; and
5. All documents listed in Construction Permit History

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.

See Other Regulatory Determinations

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

See Other Regulatory Determinations

Construction Permit History
The following construction permits were issued to this installation:
1. Construction Permit 112002-008
   This Section 5 permit was issued October 18, 2002 for the installation of a landfill gas collection system and an 800 SCFM open flare. This permit contains a special condition limiting the carbon monoxide emissions from the flare. The construction permit does not require the use of the flare. The carbon monoxide emission limitation appears in this operating permit. No monitoring or recordkeeping is included in the Operating Permit condition because the recalculated potential emissions of the flare, assuming 50% methane content and year round operation, is 6.56 tons per year. This is substantially less than the emission limitation of 100 tons per year and compliance with the limit is expected.
2. No Permit Required Letter 2007-12-054
   This no construction permit required determination is to revise the capacity of the landfill. During the redesign of the gas collection system, the design capacity was found to be larger than originally reported. The revised capacity is 3.44 million Mg, with an estimated peak landfill gas flow rate of 1021 SCFM. Since this gas flow rate is greater than that permitted in Construction Permit 112002-008, and amendment to that permit is needed if the permittee needs to exceed a combustion rate greater than 800 SCFM.
3. Construction Permit 112011-004
   This Section 6 permit was issued November 8, 2011 for the addition of an asphalt shingles storage pile with related hauling activities. Potential emissions of particulate matter are greater than the de
minimus values, but modeling was not performed because there is no NAAQS or Increment for PM. The special conditions of this permit have not been included in the operating permit as the installation no longer performs this activity.

4. Construction Permit 072015-003
This Section 5 construction permit was issued as a remedial permitting action for rock crushing, composting, and mulching operations. The installation processes concrete and rock with a 325 HP diesel engine powered rock crushing unit. The overall MHDR for the rock crushing operation is 125 tons/hour. The installation also accepts source-segregated organic waste (leaves, grass, small brush) and uses it to produce compost and mulch. The material is processed through a diesel powered tub grinder. Compost product is then composted, screened, and stored for customer pickup. Mulch product may undergo additional processing by a diesel powered mixer and strained, then stored for pickup. The MHDR of the organic waste processing is 52.5 tons/hr, with the mixer able to process 10.5 tons/hr. The rock crusher (EP-05), tub grinder with engine (EP-08), organic waste screening (EP-09), mulch mixer with engine (EP-11), and asphalt storage pile have all been removed. The haul roads, and storage piles for rock, organic waste, and mulch are still active. Special condition 1 is superseded by Construction Permit 012018-006. The requirements of Special Condition #2 are duplicated in CP012018-006, Special Condition #3. As a permit streamlining effort, these requirements only appear under Permit Condition 012018-006 of this operating permit.

5. Construction Permit 012018-006
This Section 5 construction permit was issued January 29, 2018 to authorize the installation of a new rock crusher. Special Condition #1 of this permit supersedes Special Condition #1 of Construction Permit 072015-003. Special Conditions #2 and #3 appear as Permit Condition 012018-006 in this operating permit. The remaining special conditions are duplicative of recordkeeping and reporting requirements in this operating permit and are not included as a streamlining measure.

New Source Performance Standards (NSPS) Applicability
40 CFR Part 60 Subpart Cc, Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills is not applicable because modifications have been made to the facility since May 30, 1991.

40 CFR part 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
This regulation applies to storage vessels with the following parameters:

<table>
<thead>
<tr>
<th>Rule</th>
<th>Constructed/modified/reconstructed ....</th>
<th>With contents and capacities.....</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kb</td>
<td>After July 23, 1984</td>
<td>Volatile organic liquids, &gt;19,813 gallons</td>
</tr>
</tbody>
</table>

There are no volatile organic liquid storage tanks onsite, that meet the applicability of this regulation. Therefore this regulation does not apply.

40 CFR Part 60, Subpart OO Standard of Performance for Nonmetallic Mineral Processing Plants
This regulation applies to specific unit operations at nonmetallic mineral processing plants. Although the rock crusher at this installation is a portable unit, the maximum hourly design rate is greater than the 150 ton/hr exemption listed in §60.670(c)(2), therefore it is subject to this regulation. The unit was constructed after April 2008, so those provisions appear in the permit condition. The unit is a rental unit, and may change for each rental period. Therefore the permit contains provisions for conveyors and
water spray as these may or may not be present on each rental unit. For all rental units that contain conveyors and/or water spray, the installation must comply with those provisions.

40 CFR part 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills
This subpart applies to each municipal solid waste landfill that commenced construction, reconstruction, or modification on or after May 30, 1991. The standards of this regulation classify landfills, with design capacities greater than 2.5 million megagrams and 2.5 million cubic meters, into two categories: those that are required to install control devices and those that are not required to install control devices.

The Lee’s Summit Resource Recovery Park landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters. The NMOC emission rate is less than 50 Mg per year, as demonstrated with Tier 2 NMOC sampling and testing as summarized below in Subpart XXX, therefore the landfill meets the requirements of 40 CFR 60.754(a)(3)(iii).

Because the emission rate during the term of this operating permit is anticipated to be less than 50 Mg/year NMOC, the provisions of this subpart requiring the installation of controls have not been included in this operating permit. The flare is not considered a control device under this subpart at this time. When the landfill is required to install control devices under subpart WWW, then this unit will be considered a control device. If the installation becomes subject to the requirements to install controls during the lifetime of this operating permit, an operating permit modification request must be submitted.

40 CFR part 60 Subpart XXX, Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014
The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction, or modification after July 17, 2014. Physical or operational changes made to an MSW landfill solely to comply with subparts Cc, Cf, or WWW of this part are not considered construction, reconstruction, or modification for the purposes of this section.

The landfill underwent a vertical expansion in 2017, which meets the applicability of this regulation. The Lee’s Summit Resource Recovery Park landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters. According to the Initial Design Capacity and NMOC Emission Rate Report, submitted December 4, 2017, the landfill’s uncontrolled NMOC emission rate is 28.4 Mg/yr as determined by Tier 2 sampling and testing conducted September 2017, therefore the landfill meets the requirements of 40 CFR 60.672(b)(1). The landfill is nearing capacity and anticipates closure in 2019, with an estimated annual NMOC emission rate of 33.0 Mg/yr for the next five years. Since it is not anticipated that the landfill will achieve NMOC emission rates of 34 Mg/year during the term of this operating permit, those provisions of the regulation have not been included in the permit condition. If the installation becomes subject to the requirements to install controls during the lifetime of this operating permit, an operating permit modification request must be submitted.

40 CFR part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
All internal combustion engines at this installation are mobile and are not subject to these regulations.
Maximum Achievable Control Technology (MACT) Applicability
All internal combustion engines at this installation are mobile and are not subject to this regulation.

This subpart requires all landfills described in §63.1935 to meet the requirements of 40 CFR Part 60, Subpart Cc or WWW and requires timely control of bioreactors. This subpart also requires such landfills to meet the startup, shutdown, and malfunction (SSM) requirements of the general provisions of this part and provides that compliance with the operating conditions shall be demonstrated by parameter monitoring results that are within the specified ranges. It also includes additional reporting requirements.

This subpart does not apply to Lee’s Summit Resource Recovery Park. The installation is not required to install control equipment to comply with 40 CFR part 60 Subpart WWW at the time of permit issuance. When the landfill becomes subject to the control requirements of Subpart WWW, then the installation will also be subject to this subpart.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
40 CFR part 61, Subpart M, National Emission Standards for Asbestos
The landfill does not accept asbestos containing waste. Therefore this regulation does not apply.

Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, Compliance Assurance Monitoring (CAM)
Units that are subject to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act are exempt from CAM, see §64.2(b)(1)(i). The control devices at this installation are not yet subject to emission limitations in NSPS subpart WWW. When they become subject, they will qualify for this exemption because NSPS subpart WWW was proposed on May 30, 1991. Currently, the flare is not used to comply with an applicable requirement; therefore CAM does not currently apply. In the future, when the flares are required, they will meet the exemption cited above and CAM would not apply.

Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
The emission units at this installation meet various exemptions as detailed in the following table.
10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri’s State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP, therefore it must appear in this Operating Permit.

This regulation applies to the flare and appears as a permit condition. According to both the draft and final versions of AP42, Section 2.4, Municipal Solid Waste Landfills, the sulfur content of landfill gas can be estimated at approximately 47 ppmv. This is much less than the limit imposed by this regulation, therefore no monitoring or recordkeeping is required in this permit.

The rock crusher engine (EP-14) is subject to this regulation, and is also subject to 10 CSR 10-6.261 which establishes a maximum sulfur concentration of 15 ppm. The following calculations demonstrate that when fuel with a sulfur content less than 0.0015% (15 ppm) is used the engine will be in compliance with 10 CSR 10-6.260. The recordkeeping required under 10 CSR 10-6.261 is sufficient to demonstrate compliance with 10 CSR 10-6.260.

\[
Distillate Oil \text{ } SO_2 \text{ emission factor } (\text{lbs} / \text{MMBtu}) = \frac{142(0.0015) \text{ lbs/}10^3 \text{ gal}}{140 \text{ MMBtu/}10^3 \text{ gal}} = 0.0015 \text{ lb/MMBtu}
\]

(AP - 42 Table 1.3 -1(9/98))

\[
ppmv \text{ } SO_2 = \left( \frac{0.0015lb}{\text{MMBtu}} \right) \times \left( \frac{\text{MMBtu}}{10,320 \text{ wscf}} \right) \times \left( \frac{\text{ppmw}}{1.660E^{-7} \text{ lb/scf}} \right) \times \left( \frac{0.45 \text{ ppmv}}{\text{ppmw}} \right) = 0.4 \text{ ppmv}
\]

( Appendix A - 7 to Part 60)

**SO_3**

\[
Distillate Oil \text{ } SO_3 \text{ emission factor } (\text{lbs} / \text{MMBtu}) = \frac{2 (0.0015) \text{ lbs/}10^3 \text{ gal}}{140 \text{ MMBtu/}10^3 \text{ gal}} = 0.00002 \text{ lb/MMBtu}
\]

(AP - 42 Table 1.3 -1(9/98))

\[
ppmv \text{ } SO_3 = \left( \frac{0.00002lb}{\text{MMBtu}} \right) \times \left( \frac{\text{MMBtu}}{10,320 \text{ wscf}} \right) \times \left( \frac{1.602 \times 10^7 \text{ mg ft}^3}{\text{lb m}^3} \right) = 0.03 \text{ mg } \text{ m}^3
\]

(Appendix A - 7 to Part 60)
10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This regulation applies to all sources of sulfur dioxide. There are no provisions in the regulation for combustion of landfill gas, therefore the flare is not subject to this regulation. The provisions for the sulfur content of fuel oil (15 ppm maximum) for Jackson county have been included as a permit condition in this operating permit.

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

This regulation applies to each MSW landfill for which construction, reconstruction, or modification was commenced before May 30, 1991, and has accepted waste since November 8, 1987, or has additional design capacity available for future waste deposition. This landfill constructed an expansion after May 30, 1991, therefore this regulation does not apply. The landfill is subject to NSPS Subpart WWW.

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

The particulate emissions from the flare are caused by the combustion of gaseous fuels, which do not meet the definition of process weight. The particulate emissions from the haul roads and storage piles, are considered fugitive and meet exemption (1)(B)7. Therefore this regulation does not apply.

**Removed Equipment**

During the course of the review of the permit application, the installation indicated the following equipment has been removed from site.

<table>
<thead>
<tr>
<th>EP #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-05</td>
<td>Rock Crusher with Engine</td>
</tr>
<tr>
<td>EP-08</td>
<td>Tub Grinder with Engine</td>
</tr>
<tr>
<td>EP-11</td>
<td>Mulch Mixer with Engine</td>
</tr>
<tr>
<td></td>
<td>Asphalt Shingles Storage Pile</td>
</tr>
</tbody>
</table>

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

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

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

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

The draft Part 70 Operating Permit for Lee’s Summit Resource Recovery Park was placed on public notice March 16, 2018 for a 30-day comment period. The public notice was published on the Department of Natural Resources’ Air Pollution Control Program’s web page at: https://dnr.mo.gov/env/apcp/permit-public-notices.htm. One comment was received from Mr. Bob Cheever, EPA Region 7.

Comment #1: In reviewing the draft public notice Part 70 Operating Permit for Lee’s Summit Resource Park, there is a Permit Condition incorporating the requirements from 10 CSR 10-6.261. This regulation, incorporated into the MoDNR CSR, has not been adopted into the EPA approved SIP and therefore is a “State Only” requirement, and as such you might want to consider providing a notation identifying Permit Condition 6.261 (page 12) as a “State Only Requirement.”

Response to Comment: A notation has been added to the permit condition.
Mr. Chris Bussen  
Lee’s Summit Resource Recovery Park  
1971 SE Hamblen Road  
Lee’s Summit, MO  64082

Re:  Lee’s Summit Resource Recovery Park, 095-0272  
     Permit Number: OP2018-072

Dear Mr. Bussen:

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

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.
If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:nwj

Enclosures

c: PAMS File: 2015-01-001