



**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

# **PART 70**

## **PERMIT TO OPERATE**

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

**Operating Permit Number:** OP2016-018  
**Expiration Date:** **AUG 29 2021**  
**Installation ID:** 031-0126  
**Project Number:** 2011-10-046

**Installation Name and Address**

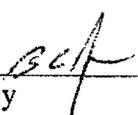
Mid-South Steel Products, Inc.  
2071 Corporate Circle  
Cape Girardeau, MO 63703  
Cape Girardeau County

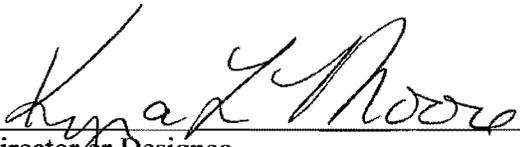
**Parent Company's Name and Address**

Mid-South Steel Products, Inc.  
2071 Corporate Circle  
Cape Girardeau MO, 63703

**Installation Description:**

Mid-South Steel Products is a specialty above ground and underground petroleum storage tank fabrication shop. All sizes of horizontal, vertical and specialty tanks are fabricated. Sheets of steel are formed together by shears, rollers and welding. The fabricated tanks are cleaned, pressure tested and some are coated or painted. Mid-South Steel is a synthetic minor source for hazardous air pollutants. It is subject to MACTs MMMM and XXXXXX.

  
Prepared by  
Bern Johnson  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

**AUG 29 2016**

Effective Date

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Mid-South Steel Products, Inc is a petroleum equipment company located in the Missouri-Illinois area that manufactures steel tanks. It was founded in 1954 in an industrial area located near the Mississippi River in the City of Cape Girardeau. Mid-South Steel is not a named source and fugitive emissions do not count in potential-to-emit calculations. Mid-South Steel is a synthetic minor source for hazardous air pollutants. It is subject to MACT MMMM and XXXXXX.

The installation is bottlenecked such that only one tank can be built at a time. Sheets of steel are brought into the building. The tanks are fabricated from the sheets by shears and rollers and welding. The facility has a total of fifteen welders on site, all but two of which are inert gas/plasma units with no emissions. The tanks are cleaned, tested, and some are coated or painted. The spray booth is a 50' by 60' room with a 4' opening at the top under the roof line for ventilation. The room is 22' high. There are two spray guns in the room. The spray guns spray either primer or paint. There is no separate area for drying.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2015	2014	2013	2012	2011
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.03	0.01	0.01	0.19	0.23
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.00	0.00	0.00	0.02	0.02
Volatile Organic Compounds(VOC)	8.52	9.90	9.90	6.93	7.44
Hazardous Air Pollutants* (HAPs)	4.53	5.26	5.26	2.62	2.89

\* - HAP emissions not reported separately in MOEIS. Emissions are a mass-balance calculation.

### 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.

2014 EIQ Emission Point #	Description
EU-01	Spray Painting – MHDR 13.0 gal/hr
EU-02	Sand Blasting – MHDR 600 lbs/hr
EU-03	Welding (15 units) – MHDR 0.43 lbs/hr

### EMISSION UNITS WITHOUT LIMITATIONS

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

None

## II. Plant Wide Emission Limitations

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

<p style="text-align: center;"><b>PERMIT CONDITION PW001</b> 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)</p>
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### **Emissions Limitations:**

- 1) The permittee shall emit less than 10 tons of each individual HAP from the entire installation in any period of 12 consecutive months.
- 2) The permittee shall emit less than 25 tons of any combination of HAPs from the entire installation in any period of 12 consecutive months.

### **Monitoring/Recordkeeping:**

- 1) The permittee shall calculate and record monthly and 12-month rolling emissions of individual HAPs and combined HAPs.
- 2) The permittee shall use Attachments F and G, or their equivalents, to demonstrate compliance with the HAP limitations.
- 3) The permittee shall maintain all records required by this permit for not less than five years and shall make such records available to any Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

### **Reporting:**

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

### 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.

<b>PERMIT CONDITION 1</b>	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart M MMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products	
Emission Unit	Description
EP-01	Hand Spray booth – installed 1954

**Emission Limitations:**

The permittee shall limit organic HAP emissions to no more than 0.31 kg / liter (2.6 lb / gallon) organic HAP coating solids used during each 12-month compliance period. [§63.3890(b)(1)]

**Compliance Methods:**

- 1) The permittee must include all coatings, thinners and/or other additives, and cleaning materials used in EP-01 when determining whether the organic HAP emission rate is equal to or less than the emission limit above. To make this determination, the permittee has chosen to use the complaint material option. If the permittee switches between compliance options for any coating operation or group of coating operations, it must document this switch and must report it in the next semiannual compliance report [§63.3891]
  - a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to emission limit above, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the following requirements: [§63.3891(a)]
    - i) the permittee must use no coating for which the organic HAP content exceeds the emission limit above, and use no thinner and/or other additive, or cleaning material that contains organic HAP. A compliance period consists of 12 months
    - ii) As part of each semiannual compliance report, the permittee must identify the coating operation(s) for which it used the compliant material option. If there were no deviations from the emission limit above, the permittee shall a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because no coatings were used for which the organic HAP content exceeded the emission limit above, and no thinner and/or other additive, or cleaning material that contained organic HAP, was used. [§63.3942(c)]

**Recordkeeping:**

- 1) The permittee must collect and keep records of the following data and information. Failure to collect and keep these records is a deviation from the applicable standard. [§63.3930]
  - a) A copy of each notification and report submitted to comply with Subpart M MMM, and the documentation supporting each notification and report. [§63.3930(a)]

- b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the information used is provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
- c) For each compliance period: [§63.3930(c)]
  - i) A record of the coating operations used for each compliance option and the time periods (beginning and ending dates and times) used. [§63.3930(c)(1)]
  - ii) a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941. [§63.3930(c)(2)]
- d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. The permittee may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
- e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
- f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
- g) The permittee must keep records of the date, time, and duration of each deviation. [§63.3930(j)]
- h) The permittee's records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
- i) The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
- j) The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. It may keep the records off-site for the remaining 3 years. [§63.3931(c)]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month in which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.
  - a) If there were no deviations from the emission limitation, the semiannual compliance report must include a statement that there were no deviations from the emission limitation during the reporting period. [§63.3920(a)(4)]
  - b) If there was a deviation from the emission limit, the semiannual compliance report must contain the following information: [§63.3920(a)(5)]
    - i) Identification of each coating used that deviated from the emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [§63.3920(a)(5)(i)]

- ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating that deviated from the emission limit. The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports). [§63.3920(a)(5)(ii)]
- iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material. The permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports). [§63.3920(a)(5)(iii)]
- iv) A statement of the cause of each deviation. [§63.3920(a)(5)(iv)]

<b>PERMIT CONDITION 2</b>		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart XXXXXX Area Source Standards for Nine Metal Fabrication and Finishing Source Categories		
Emission Unit	Description	Manufacturer & Model
EU-03	Welding (15 units)	various

**Operational Limitation:**

- 1) The permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer’s instructions [63.11516(f)(1)].
- 2) The permittee shall implement one or more of the following management practices to minimize emissions of metal fabrication HAPs (MFHAP), as practicable, while maintaining the required welding quality through the application of sound engineering judgment:
  - a) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)— also called metal inert gas welding (MIG)) [63.11516(f)(2)(i)];
  - b) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates [63.11516(f)(2)(ii)];
  - c) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation [63.11516(f)(2)(iii)];
  - d) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated [63.11516(f)(2)(iv)]; or
  - e) Use a welding fume capture and control system, operated according to the manufacturer’s specifications [63.11516(f)(2)(v)].

**Conditional Operational Limitation:**

If the permittee uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), it must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs 63.11516(f)(3) through (8) [63.11516(f)].

**Monitoring/Recordkeeping**

The permittee shall keep records of welding rod usage, calculated on a rolling 12-month basis (Attachment E or equivalent) [63.11516(f)].

**Reporting:**

The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

<b>PERMIT CONDITION 3</b>		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Sources Installed before September 24, 1971		
Emission Unit	Description	
EP-01	Hand Spray booth – installed 1954	custom
EU-02	Sand-blasting – installed 1954	custom
EU-03	Welding (15 units)	various

**Emission Limitation:**

- 1) The permittee shall not cause or allow emissions with an opacity greater than 40% to be discharged into the atmosphere from any of the existing sources listed.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If no visible emissions are observed using Method 22, then no further observations are required. For emission units with visible emissions, the permittee shall have a certified observer conduct a Method 9 opacity observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. Issuance of this permit does not trigger a monitoring schedule reset.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results, noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units, and
  - b) All emission units from which visible emissions occurred.
  - c) The permittee shall maintain records of any equipment malfunctions.

- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition.
- 3) Attachments B, C, and D contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance / Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

<b>PERMIT CONDITION 4</b>		
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes		
Emission Unit	Description	Manufacturer/Model #
EU-02	Sand-blasting – installed 1954	custom

note – EP-02 is conditionally exempt from 10 CSR 10-6.400 with this operational limitation. Therefore the emission limits have not been specified in this condition.

**Operational Limitation:**

- 1) The permittee shall not operate EU-02 without fabric filter in place.
- 2) The permittee shall operate the fabric filter in accordance with manufacturer’s instructions.

**Monitoring:**

- 1) The permittee shall inspect filters for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 2) The permittee shall follow the manufacturer’s recommendations with regard to installation and frequency of replacement of the filters.
- 3) The fabric filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device.
- 4) The permittee shall monitor and record the operating pressure drop across the fabric filters at least once every 24 hours that EU-02 is in operation, using Attachment H or equivalent. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty

**Record Keeping:**

- 1) The permittee shall maintain a log of control device maintenance and inspections, including when they occur (see Attachment D).
- 2) The permittee shall maintain all records onsite for a minimum of five years and shall be made available to Department of Natural Resources’ personnel upon request.

**Reporting:**

The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual monitoring report required by Section V of this permit.

## 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 is only an excerpt from the regulation or code, and is provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of

the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

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

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

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

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

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

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

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

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

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

- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

**10 CSR 10-6.150 Circumvention**

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

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

**This requirement is not federally enforceable.**

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

**10 CSR 10-6.170**

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

**Emission Limitation:**

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

- b) Paving or frequent cleaning of roads, driveways and parking lots;
- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

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

**Recordkeeping:**

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

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

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

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement

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

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

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

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

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

- 
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
    - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
    - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
    - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
    - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
    - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
  - 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
  - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
  - 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

## V. General Permit Requirements

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

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

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

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

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. 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, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

#### **10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)**

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

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

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

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

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

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

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

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

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

**10 CSR 10-6.065(6)(C)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, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

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

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The 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, 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, 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 day 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 application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This 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 Ron Underwood, Vice-President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 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) MDNR 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 B**  
 Opacity Emission Observations

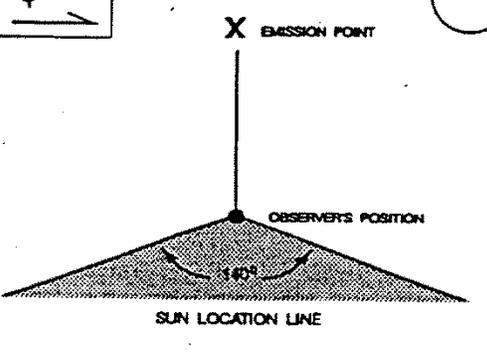
FUGITIVE OR SMOKE EMISSION INSPECTION INDOOR LOCATION			
Company Location Company Rep.	Observer Affiliation Date		
Precipitation	Wind Speed		
Industry	Process Unit		
Light type (fluorescent, incandescent, natural) _____			
Light location (overhead, behind observer, etc.) _____			
Illuminance (must be greater than or equal to 100 lux or 10 foot candles)			
Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.			
<b>OBSERVATIONS</b>	<b>Clock Time</b>	<b>Observation period duration, minutes:seconds</b>	<b>Accumulated emission time, minutes:seconds</b>
Begin Observation	_____	_____	_____
To complete this form, record the following:			
• the initial clock time			
• the total time of the observation (from SW1)			
• the total time of emissions (from SW2), and			
• the final clock time.			
For more details on recording this data and taking breaks, see #7 and #10 above.			
End Observation	_____	_____	_____

FUGITIVE OR SMOKE EMISSION INSPECTION OUTDOOR LOCATION			
Company Location Company Rep.	Observer Affiliation Date		
Sky Conditions	Wind Direction		
Precipitation	Wind Speed		
Industry	Process Unit		
Sketch process unit; indicate observer position relative to source; indicate potential emission points and/or actual emission points.			
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>			
<b>OBSERVATIONS</b>			
	Clock Time	Observation period duration, minutes:seconds	Accumulated emission time, minutes:seconds
Begin Observation	_____	_____	_____
To complete this form, record the following:	_____	_____	_____
• the initial clock time	_____	_____	_____
• the total time of the observation (from SW1)	_____	_____	_____
• the total time of emissions (from SW2), and	_____	_____	_____
• the final clock time.	_____	_____	_____
For more details on recording this data and taking breaks, see #7 and #10 above.	_____	_____	_____
_____	_____	_____	_____
End Observation	_____	_____	_____

Attachment C

Visible Emission Form

VISIBLE EMISSION OBSERVATION FORM

COMPANY NAME		
LOCATION		
LOCATION		
CITY	STATE	ZIP
PROCESS EQUIPMENT		OPERATING MODE
CONTROL EQUIPMENT		OPERATING MODE
DESCRIBE EMISSION POINT		
HEIGHT ABOVE GROUND LEVEL		HEIGHT RELATIVE TO OBSERVER
		START                  END
DISTANCE FROM OBSERVER		DIRECTION FROM OBSERVER
START                  END		
VERTICAL ANGLE TO PLUME		HORIZONTAL ANGLE TO PLUME
DESCRIBE EMISSIONS		
START                  END		
EMISSION COLOR		IF WATER DROPLET PLUME
START                  END		ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/> NA <input type="checkbox"/>
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED		
START                  END		
DESCRIBE PLUME BACKGROUND		
START                  END		
BACKGROUND COLOR		SKY CONDITIONS
START                  END		START                  END
WIND SPEED		WIND DIRECTION
START                  END		START                  END
AMBEINT TEMP		WET BULB TEMP      RH percent
START                  END		
STACK WITH PLUME  SUN  WIND 	SOURCE LAYOUT SKETCH  DRAW NORTH ARROW 	
ADDITIONAL INFORMATION		

OBSERVATION DATE		START TIME				END TIME
SEC	MIN	0	15	30	45	COMMENTS
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						

OBSERVER'S NAME (PRINT)	
OBSERVER'S SIGNATURE	DATE
ORGANIZATION	
CERTIFIED BY	DATE

CONTINUED ON VEO FORM NUMBER				
------------------------------	--	--	--	--



**Attachment E**  
 Monthly Welding Rod Usage Worksheet

Month/Year \_\_\_\_\_

Emission Point	Description	<sup>1</sup> Welding Rod type	Monthly Usage (tons)
EU-03	Steel Welding Booth		
<sup>2</sup> Total Monthly Welding Rod Usage			
<sup>3</sup> Total welding rod usage for 12-month rolling			

<sup>1</sup>List welding rods that contain “compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead.” [63.11514(b)]  
<sup>2</sup>Total monthly Welding Rod Usage is the sum of the total monthly emissions for each emission point.  
<sup>3</sup>Total 12-Month Rolling Welding Rod Usage = sum of twelve most recent Monthly Welding Rod Usage Worksheets.  
**12-Month Rolling Total Welding Rod Usage more than 2,000 tons/yr results in additional requirements in 63.11516(f)(3)-(8) and a significant Part 70 modification to the operating permit.**

**Attachment F**

**Combined HAPs Compliance Worksheet**

This worksheet covers the period from \_\_\_\_\_ to \_\_\_\_\_  
 (month/year) (month/year)

Emission Point	Description	<sup>1</sup> Monthly Usage	Units	<sup>2</sup> Emission Factor (lbsHAP/ unit)	<sup>3</sup> Total Monthly Emissions (tons/month)
EU-01	Spray booth		gal	2.7 lbs xylene	
				0.25 lbs methyl alcohol	
				0.001 lbs methyl isobutyl ketone	
				1.53 lbs methylene(B)4-phenylisocyanate	
				0.001 lbs Styrene	
				1.48 lbs Toluene	
EU-03	6011 electrode (SCC 30905132)		1000 lbs	0.01 lb Cr	
				0.001 lb Co	
				1.00 lb Mn	
				0.005 lb Ni	
	7024 electrode (SCC 30905148)		1000 lbs	0.001 lb Cr	
				0.63 lb Mn	
<b><sup>4</sup>Total Monthly Installation-Wide HAP Emissions (tons)</b>					
<b><sup>5</sup>Total 12-Month Rolling Installation-Wide HAP Emissions (tons)</b>					

<sup>1</sup> Enter total amount of welding rod (indicated in the next column) used in month.  
<sup>2</sup> Emission factor sources are MSDS for paint booths, using the highest HAP content if different coatings are used; and WebFIRE for welding. If a coating is used that has a different or higher HAP factor than this table, add name and factor to the worksheet in the space provided.  
<sup>3</sup> Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.  
<sup>4</sup> Total installation emissions are the sum of the total monthly emissions for each emission point.  
<sup>5</sup> 12-Month Rolling HAP Emissions = Sum of twelve most recent Combined HAPs Compliance Worksheets + start-up, shutdown, and malfunction emissions.  
**12-Month Rolling Total Combined HAP Emissions less than 25 tons/yr indicates compliance.**

**Attachment G**  
 Individual HAP Compliance Worksheet

HAP Name: Isomers of Xylene CAS No.: 1330-20-7

This worksheet covers the period from \_\_\_\_\_ to \_\_\_\_\_  
 (month/year) (month/year)

Emission Point	Description	<sup>1</sup> Monthly Usage	Units	<sup>2</sup> Emission Factor (lbsHAP/ unit)	<sup>3</sup> Total Monthly Emissions (tons/month)
EP-01	Spray Booth		gal	2.7 lbs Xylene/gal	
<b><sup>4</sup>Total Monthly Installation-Wide HAP Emissions (tons)</b>					
<b><sup>5</sup>Total 12-Month Rolling Installation-Wide HAP Emissions (tons)</b>					

<sup>1</sup> Enter total amount of material (indicated in the next column) used in month. Note: emission point, description, unit, and emission factors are found in Attachment F.

<sup>2</sup> Emission factor sources are MSDS for paint booths, using the highest HAP content if different coatings are used; and WebFIRE for welding. If a coating is used that has a different or higher HAP factor than this table, add name and factor to the worksheet. At the time this permit was written, Isomers of xylene is the only HAP with PTE greater than 10 tons/year.

<sup>3</sup> Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

<sup>4</sup> Total installation emissions are the sum of the total monthly emissions for each emission point.

<sup>5</sup> 12-Month Rolling HAP Emissions = Sum of twelve most recent Individual HAP Compliance Worksheets.

**12-Month Rolling Total Individual HAP Emissions less than 10 tons/yr indicates compliance.**



**APPENDIX A**

Abbreviations and Acronyms

<b>%</b> ..... percent	<b>Mgal</b> ..... 1,000 gallons
<b>°F</b> ..... degrees Fahrenheit	<b>MW</b> ..... megawatt
<b>acfm</b> ..... actual cubic feet per minute	<b>MHDR</b> ..... maximum hourly design rate
<b>BACT</b> ..... Best Available Control Technology	<b>MMBtu</b> ..... Million British thermal units
<b>BMPs</b> ..... Best Management Practices	<b>MMCF</b> ..... million cubic feet
<b>Btu</b> ..... British thermal unit	<b>MSDS</b> ..... Material Safety Data Sheet
<b>CAM</b> ..... Compliance Assurance Monitoring	<b>NAAQS</b> ..... National Ambient Air Quality Standards
<b>CAS</b> ..... Chemical Abstracts Service	<b>NESHAPs</b> ... National Emissions Standards for Hazardous Air Pollutants
<b>CEMS</b> ..... Continuous Emission Monitor System	<b>NO<sub>x</sub></b> ..... nitrogen oxides
<b>CFR</b> ..... Code of Federal Regulations	<b>NSPS</b> ..... New Source Performance Standards
<b>CO</b> ..... carbon monoxide	<b>NSR</b> ..... New Source Review
<b>CO<sub>2</sub></b> ..... carbon dioxide	<b>PM</b> ..... particulate matter
<b>CO<sub>2e</sub></b> ..... carbon dioxide equivalent	<b>PM<sub>2.5</sub></b> ..... particulate matter less than 2.5 microns in aerodynamic diameter
<b>COMS</b> ..... Continuous Opacity Monitoring System	<b>PM<sub>10</sub></b> ..... particulate matter less than 10 microns in aerodynamic diameter
<b>CSR</b> ..... Code of State Regulations	<b>ppm</b> ..... parts per million
<b>dscf</b> ..... dry standard cubic feet	<b>PSD</b> ..... Prevention of Significant Deterioration
<b>EQ</b> ..... Emission Inventory Questionnaire	<b>PTE</b> ..... potential to emit
<b>EP</b> ..... Emission Point	<b>RACT</b> ..... Reasonable Available Control Technology
<b>EPA</b> ..... Environmental Protection Agency	<b>RAL</b> ..... Risk Assessment Level
<b>EU</b> ..... Emission Unit	<b>SCC</b> ..... Source Classification Code
<b>fps</b> ..... feet per second	<b>scfm</b> ..... standard cubic feet per minute
<b>ft</b> ..... feet	<b>SDS</b> ..... Safety Data Sheet
<b>GACT</b> ..... Generally Available Control Technology	<b>SIC</b> ..... Standard Industrial Classification
<b>GHG</b> ..... Greenhouse Gas	<b>SIP</b> ..... State Implementation Plan
<b>gpm</b> ..... gallons per minute	<b>SMAL</b> ..... Screening Model Action Levels
<b>gr</b> ..... grains	<b>SO<sub>x</sub></b> ..... sulfur oxides
<b>GWP</b> ..... Global Warming Potential	<b>SO<sub>2</sub></b> ..... sulfur dioxide
<b>HAP</b> ..... Hazardous Air Pollutant	<b>tph</b> ..... tons per hour
<b>hr</b> ..... hour	<b>tpy</b> ..... tons per year
<b>hp</b> ..... horsepower	<b>VMT</b> ..... vehicle miles traveled
<b>lb</b> ..... pound	<b>VOC</b> ..... Volatile Organic Compound
<b>lbs/hr</b> ..... pounds per hour	
<b>MACT</b> ..... Maximum Achievable Control Technology	
<b>µg/m<sup>3</sup></b> ..... micrograms per cubic meter	
<b>m/s</b> ..... meters per second	

## STATEMENT OF BASIS

### 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.

Mid-South Steel Products has been in operation since 1954, but apparently operated without a permit for over thirty years. Due to an apparent misunderstanding of their obligations, construction and Basic operating permit applications were submitted in 2010. A “no permit required” determination was made since there was no new construction. The facility was informed that it was a major source for VOCs and HAPs, and submitted a Part 70 application on January 9, 2012. Due to some confusion over application fee payments and necessary signatures, technical review of the application was delayed. The fee and signature issues were settled and the application deemed complete on January 26, 2012.

After a long delay, technical review was started in July 2015. Mid-South Steel Products stated that nothing in its operations had changed and the information in the application was still current. During the current technical review, the Air Program determined that, due to bottlenecks which limit production to one tank at a time, Mid-South Steel is not a major source for VOCs. It is a major source for xylene and combined HAPs.

- 1) Initial Part 70 Operating Permit Application, received January 9, 2012;
- 2) 2014 Emissions Inventory Questionnaire, received April 20, 2014;
- 3) WebFIRE; and
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

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

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

### Construction Permit History

The following revisions were made to construction permits for this installation:

None

### **New Source Performance Standards (NSPS) Applicability**

None

### **Maximum Achievable Control Technology (MACT) Applicability**

40 CFR Part 63 Subpart MMMM – National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products – this rule applies to coatings of a variety of metal products and metal parts. The compliance date for existing sources is January 2, 2007. Despite it's accepting a 10/25 voluntary limit in Permit Condition 1, Mid-South Steel is subject to Subpart MMMM (see Permit Condition 1) under the "once in, always in" principle, because it's PTE for xylene and combined HAPs are over the major source levels currently and there is no evidence this was not the case at the compliance date. Mid-South Steel complies with the subpart through the Compliant Materials option.

40 CFR Part 63 Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* – this subpart applies to various spray booth operations at area sources of the target HAPs: compounds of chromium, lead, manganese, nickel, or cadmium. EU-02 is not a paint stripping operation that uses methylene chloride nor uses coatings that contain any target HAP. Therefore, Subpart HHHHHH does not apply to this installation. If a coating that contains any target HAP is used, Mid-South Steel must comply with Subpart HHHHHH.

40 CFR Part 63 Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* – this subpart applies to area sources that are primarily engaged in any of nine source categories. This subpart applies to EU-03, welding units. EU-03 uses welding rods that contain one or more metal fabrication HAPs in percentages greater than those specified in the Subpart.

- steel welding units – annual throughput is less than 2,000 lbs/year. If throughput ever exceeds 2,000 lbs/year, there are significant additional requirements such as visible emissions monitoring.
- visible determination of fugitive emissions [63.11517] – these requirements are the same as those required by 10 CSR 10.6.220. Therefore, they are not repeated in Permit Conditions 2.
- the installation uses metal inert gas (MIG) and pulsed-current (GMAW) techniques to comply with this subpart.

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

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should

undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

**Compliance Assurance Monitoring (CAM) Applicability**

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

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

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

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>	VOC HAP	Potential to Emit (tons/yr) <sup>1</sup>	Metal HAP	Potential to Emit (tons/yr) <sup>1</sup>
CO	0	Isomers of xylene	12.19	Cobalt	0.000
HAP	27.68	Methyl alcohol	1.20	Chromium	0.000
NO <sub>x</sub>	0	Methyl isobutyl ketone	0.01	Manganese	0.004
PM <sub>10</sub>	0.397	Methylene(B)4-phenylisocyanate	7.26	Nickel	0.000
PM <sub>2.5</sub>	0.028	Styrene	0.01		
SO <sub>x</sub>	0	Toluene	7.02		
VOC	52.05				

<sup>1</sup>The installation is capable of building only one tank at a time – estimated time 12 hours total. Spray painting (EP-01) was evaluated at 730 hours (1 hour coating). Sand-blasting (EP-02) was evaluated at 730 hours of controlled annual operation (1 hour). Welding (EP-03) was evaluated at 1095 (1.5 hours welding).

**Other Regulatory Determinations**

10 CSR 10-6.400 –*Restriction of Particulate Matter Emissions from Industrial Processes* – all three emission units are exempt. EU-01 is exempt under (1)(B)7; spray coating of large tanks takes place in a large enclosed building and particulates cannot reasonably be controlled by a stack. EU-02 is exempt under (1)(B)15; Permit Condition 4 requires use of the existing fabric filter while sand-blasting is in operation. EU-03 is exempt under (1)(B)12.

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

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

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

5. The rule is only for administrative purposes.

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

## Response to Public Comments

A draft of the Part 70 Operating Permit for Mid-South Steel Products was placed on public notice on April 22, 2016, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency and Mr. Peter Muzio of the Northeast Regional Office of MDNR. The comments are addressed in the order in which they appear within the letters.

### Mr. Peter Muzio

#### Comment #: 1

OP Title Page

“Installation Description:

Mid-South Steel Products is a specialty..... Mid-South Steel is a major source for hazardous air pollutants. It is subject to MACTs MMMM and XXXXXX.

Then on Page 3, I. Installation Description and Equipment Listing

“Installation Description:

Mid-South Steel Products, Inc. is a petroleum equipment company ..... Mid-South Steel is a synthetic minor source for hazardous air pollutants. It is subject to MACT MMMM.”

Question: Can a plant be a major and synthetic minor source of HAP?

#### Response to Comment:

Mid-South Steel’s potential-to-emit (PTE) for xylene is over 10 tons per year, which would make it a major source except that it accepted a voluntary limit to make it a synthetic minor source for xylene. The title page description was correct to reflect this fact.

#### Comment #: 2

The operations of the paint booth, blasting and welding are grouped requiring Method 22’s. My interpretation of Subpart 6X is that it has specific Tiers (1-3) for emissions and a Method 9 requirement within a Tier if a facility uses 2,000 lbs. or more of wire/rod in a 12 month period. I’m assuming that the paint does not have metal HAP(s), just the welding.

Recommendations:

1) Separate the painting and blasting (assuming they have stacks leading outdoors) as one 10-6.220 requirement.

2) Make the welding process a new Permit Condition under 10-6.220 and §63.11517 What are my monitoring requirements? under Subpart 6X. Then address the <2,000lbs requirements and >2,000lbs Tier requirements i.e.

Tier 1. The first tier for welding compliance requires visual determinations of fugitive emissions using EPA Method 22

Tier 2. The second tier for welding compliance must be implemented if visible emissions are detected for the second time in any consecutive 12- month period. The second tier requires corrective action and documentation of the detection of visible emissions and the corrective action taken. Corrective action must take place immediately after the failed Method 22 test. In addition, the second tier for welding

compliance requires a facility to perform a visual determination of emissions opacity using EPA Method 9 (40 CFR part 60, appendix A-4) within 24 hours of the failed Method 22 test.

Tier 3. The third tier for welding compliance includes the development and implementation of a Site-specific Welding Emissions Management Plan (SWMP) within 30 days and submittal of the SWMP to the delegated authority. The SWMP must be kept at the facility in a readily accessible location for inspector review. Also, the facility must report any exceedance of the 20 percent opacity limit on an annual basis along with their annual certification and compliance report. The purpose of the SWMP is to ensure that no visible emissions occur in the future from this process, as determined by EPA Method 22 tests or 20 percent opacity or less by EPA Method 9.

**Response to Comment:**

It is correct that Subpart XXXXXX has significant additional requirements, including an opacity limit of 20% instead of the 40% in Permit Condition 3, if the installation uses more than 2,000 lbs of welding rod. However, Mid-South Steel typically uses much less than 2,000 lbs of welding rod. Rather than include a Permit Condition for a circumstance that will likely never occur, these additional requirements are mentioned in the Statement of Basis only.

**Comment #: 3**

Comment: The sample Method 9 Field Data Sheet has no "blank" area to document position of observer, wind direction, stacks, etc. (see Appendix A of enclosed Method 9/22 Manual)

Recommendation: Include a blank area in the sample field data sheet.

Comment: The permit does not have an outdoor sample Method 22 field data sheet.

Recommendation: Include a sample outdoor field data sheet (fig. 22-1 of attached manual, and Page 5 of attached EPA Method 22 Q and A).

**Response to Comment:**

Attachments B(Method 22) and C (Method 9) were replaced with the more complete forms provided by the commenter.

**Mr. Robert Cheever**

**Comment #: 1**

Permit Condition 1 incorporates the applicable requirements from 40 CFR Part 63, Subpart M MMM: "*National Emission Standards for Hazardous Air Pollutants for the Surface Coating of Miscellaneous Metal Parts and Products*" (MACT MMMM). It appears that MDNR is attempting to streamline Permit Condition 1 by "incorporating by reference" (IBR) many of the applicable requirements from MACT MMMM.

EPA strongly supports and encourages the permitting authority use of IBR and has issued guidance that describes EPA's recommended approach. This guidance says that IBR, in operating permits, may be appropriate and useful under several circumstances including referencing of test method procedures; inspection and maintenance plans; and compliance determination calculation methodology. EPA's guidance further recommends that all emission limits, operational requirements, compliance determinations, and monitoring, recordkeeping, and reporting, applicable to the specific emission unit(s), must be clearly incorporated into the permit. There is value to be

gained by the permittee and the permitting authority through review of all the specific requirements and extraction of those which are applicable and translating these applicable requirements in a logical fashion as appropriate operating permit conditions.

Therefore, EPA strongly encourages MDNR to include the applicable 40 CFR part 63, Subpart Mmmm specific operational, continuous compliance, monitoring, record keeping and reporting tasks as requirements in Permit Condition 1 and recommends the following revisions:

- Emission limitation of "0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each 12-month compliance period" in place of "the applicable emission limit in §63.3890" in:
  - Compliance Method 1);
  - Compliance Method 1 ) a);
  - Compliance Method 2);
  - Compliance Method 4);
  - General Compliance Requirement 1a); and
  - Reporting requirement 2)e);
- The detailed requirements of §§63.3940, 63.3941, and 63.3942, should be spelled out in Compliance Method 1)a);
- Specify the initial compliance period in Compliance Method 2);
- Statement of Basis says the permittee has chosen to use option a); *Compliant Material Option*, for compliance verification and yet Compliance Method 3) and Record keeping requirement 2)e) both begin by saying: "If the permittee chooses to comply with the emission limitations by using the compliant material option;"
- In as much as the Statement of Basis indicates the permittee has selected the compliant material option, EPA recommends that Compliance Method 1) be revised to so indicate and the other extraneous compliance options should be deleted;
- Compliance Method 3) refers to "criteria specified in paragraph (a) of this section," however, operating permits do not have sections.
- Compliance Method 1) says: "The permittee must include all coatings, thinners and/or other additives, and cleaning materials used in the affect source when ...." EPA suggest replacing "affected source" with the emission unit EP-01 which is subject to the requirement.

Finally, 40 CFR 63 Subpart Mmmm had a compliance date of January 2, 2007 and therefore it would appear that Notification requirement 1) has already been completed and the requirement may no longer be applicable and should be removed from the operating permit.

**Response to Comment:**

Permit Condition 1 was revised to incorporate the specific recommendations in the comment. In addition, the entire text of Permit Condition 1 was reviewed and several sections of unnecessary or repetitive text was removed.

Mr. Ron Underwood  
Mid-South Steel Products, Inc.  
2071 Corporate Circle  
Cape Girardeau, MO 63703

Re: Mid-South Steel Products, Inc., 031-0126  
Permit Number: OP2016-018

Dear Mr. Underwood:

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:bjj

Enclosures

c: PAMS File: 2011-10-046