



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

JAN 11 2016

Mr. Jeff Davis
Missouri Hardwood Flooring Company
P.O. Box 117
Birch Tree, MO 65438

Re: Missouri Hardwood Flooring Company, 203-0005
Permit Number: OP2015-026

Dear Mr. Davis:

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in black ink that reads "Michael J. Stansfield". The signature is written in a cursive style.

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

MJS/jw

Enclosures

c: PAMS File: 2014-12-004



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2015-026
Expiration Date: JAN 1 1 2021
Installation ID: 203-0005
Project Number: 2014-12-004

Installation Name and Address

Missouri Hardwood Flooring Company
Highway 99 North
Birch Tree, MO 65438
Shannon County

Parent Company's Name and Address

Missouri Hardwood Flooring Company
Highway 99 North
Birch Tree, MO 65438

Installation Description:

Missouri Hardwood Flooring Company operates a flooring manufacturing plant in Birch Tree, Missouri. Processes include wood sawing, lumber treatment, storage and hauling. The facility has taken a voluntary limit on PM₁₀ emissions to below the major level in order to obtain the Intermediate Operating Permit. This wood fired boiler at this facility is subject to 40 CFR Part 63 Subpart JJJJJ.

Prepared by:
Jill Wade, PE
Operating Permit Unit

Director or Designee
Department of Natural Resources

JAN 1 1 2016

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Missouri Hardwood Flooring Company operates a flooring manufacturing plant in Birch Tree, Missouri. Processes include wood sawing, lumber treatment, storage and hauling. The facility has taken a voluntary limit on PM₁₀ emissions to below the major level in order to obtain the Intermediate Operating Permit. This source is not a named source, therefore fugitive emissions do not count toward major source applicability.

In the last five years this facility has submitted full Emissions Inventory Questionnaire's in 2011 and 2009. The following actual emissions were reported:

Reported Air Pollutant Emissions, tons per year		
Pollutants	2011	2009
Particulate Matter ≤ Ten Microns (PM ₁₀)	1.83	2.29
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.22	0.50
Sulfur Oxides (SO _x)	0.32	0.71
Nitrogen Oxides (NO _x)	6.36	14.04
Volatile Organic Compounds(VOC)	0.22	0.48
Carbon Monoxide (CO)	7.78	17.20
Hazardous Air Pollutants (HAPs)	0.79	0.79

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU-1-1 through EU-1-8	Process Line #1
EU-2-1 through EU-2-8	Process Line #2
EU-3-1 through EU-3-8	Process Line #2
EU-04	Wood Fired Boiler
EU-07	Silo Storage
EU-08	Wood Waste Storage Bin
EP-14	Microbicide Dip Tank

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

- EP-09 Haul Road Rough Lumber
- EP-10 Haul Road/Moving Finished Lumber
- EP-11 Haul Road for Sawdust

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. Plant wide emission limits apply to all emission units at the facility including emission units with limitations, emission units without limitations and insignificant units.

PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

The permittee shall not cause or allow the emission of particulate matter of a diameter of less than or equal to 10 microns (PM₁₀) in excess of 100 tons in any consecutive 12-month period.

Monitoring/Record Keeping:

- 1) The permittee shall maintain an accurate record of actual monthly throughput for all emission units which emit PM₁₀.
- 2) The monthly emissions of PM₁₀ for each emission unit shall be calculated by tracking the monthly throughput of each point source of PM₁₀ and multiplying by the emission factor (from the Emissions Inventory Questionnaire), and any applicable control device efficiency. Emissions of PM₁₀ from all sources are to be summed monthly.
- 3) The permittee shall calculate the rolling 12-month total of PM₁₀ emissions by summing the monthly emissions of each emission unit for the last 12 months.
- 4) The permittee shall maintain records of all information used to demonstrate compliance with the PM₁₀ emission limit and include the source of the emission factors used and verification of the control device efficiency used.
- 5) All records shall be kept for no less than five years and be made available to Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the date that records show that the installation exceeded the PM₁₀ emission limitation.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants
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Emission Unit	Description	
EU-01 Process Line #1		
EU-1-1	Log Sawing; MHDR = 36.2 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-01)
EU-1-2	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-3	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-4	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-5	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-6	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-7	Log Sawing; MHDR = 10.0 tons/hr	
EU-1-8	Log Sawing; MHDR = 36.2 tons/hr	
EU-01 Process Line #2		
EU-2-1	Log Sawing; MHDR = 36.2 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-1)
EU-2-2	Log Sawing; MHDR = 20.3 tons/hr	
EU-2-3	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-4	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-5	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-6	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-7	Log Sawing; MHDR = 10.0 tons/hr	
EU-2-8	Log Sawing; MHDR = 36.2 tons/hr	
EU-01 Process Line #3		
EU-3-1	Log Sawing; MHDR = 36.2 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-02)
EU-3-2	Log Sawing; MHDR = 19.7 tons/hr	
EU-3-3	Log Sawing; MHDR = 17.5 tons/hr	
EU-3-4	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-5	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-6	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-7	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-8	Log Sawing; MHDR = 10.0 tons/hr	
Wood Boiler		
EU-04	15.1 MMBtu/hr Wood Fired Boiler (20% moisture); MHDR = 0.76 tons/hr	Controlled by Multi-cyclone with fly ash reinjection: 80% control efficiency (CD-03)

Storage Units		
EU-07	Silo Storage; MHDR = 5 tons/hr	Controlled with closed loop cyclone system: 90% control efficiency (CD-05)
EU-08	Wood Waste Storage Bin; MHDR = 5 tons/hr	Partial Enclosure: 50% control efficiency

Emission Limitation:

No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with opacity greater than 20%.

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

Monitoring:

- 1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment B), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment D)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments B, C and D contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification, as required by as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 002
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Unit	Description	
EU-01 Process Line #1		
EU-1-1	Log Sawing; MHDR = 36.2 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-01)
EU-1-2	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-3	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-4	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-5	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-6	Log Sawing; MHDR = 36.2 tons/hr	
EU-1-7	Log Sawing; MHDR = 10.0 tons/hr	
EU-1-8	Log Sawing; MHDR = 36.2 tons/hr	
EU-01 Process Line #2		
EU-2-1	Log Sawing; MHDR = 36.2 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-1)
EU-2-2	Log Sawing; MHDR = 20.3 tons/hr	
EU-2-3	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-4	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-5	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-6	Log Sawing; MHDR = 36.2 tons/hr	
EU-2-7	Log Sawing; MHDR = 10.0 tons/hr	
EU-2-8	Log Sawing; MHDR = 36.2 tons/hr	
EU-01 Process Line #3		
EU-3-1	Log Sawing; MHDR = 36.2 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-02)
EU-3-2	Log Sawing; MHDR = 19.7 tons/hr	
EU-3-3	Log Sawing; MHDR = 17.5 tons/hr	
EU-3-4	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-5	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-6	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-7	Log Sawing; MHDR = 36.2 tons/hr	
EU-3-8	Log Sawing; MHDR = 10.0 tons/hr	

Storage Units		
EU-07	Silo Storage; MHDR = 5 tons/hr	Controlled with closed loop cyclone system: 90% control efficiency (CD-05)
EU-08	Wood Waste Storage Bin; MHDR = 5 tons/hr	Partial Enclosure: 50% control efficiency

Emission Limitation:

- 1) The permittee shall not cause, allow or permit the emission of particulate matter from sawing and storage operations in excess of the amounts, in pounds per hour, listed for each emission unit in the table below.
- 2) The emission rates were calculated using one of the following equations:
 - a) For process weight rates of 60,000 lb/hr or less:
 $E = 4.10(P)^{0.67}$
 Where:
 E = rate of emission in lb/hr
 P = process weight rate in tons/hr
 - b) For process weight rates greater than 60,000 lb/hr:
 $E = 55.0(P)^{0.11} - 40$
 Where:
 E = rate of emission in lb/hr
 P = process weight rate in tons/hr
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Emission Unit	Description	PM Emission Limit (pounds/hour)
EU-1-1	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-1-2	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-1-3	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-1-4	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-1-5	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-1-6	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-1-7	Log Sawing; MHDR = 10.0 tons/hr	19.2
EU-1-8	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-2-1	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-2-2	Log Sawing; MHDR = 20.3 tons/hr	30.8
EU-2-3	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-2-4	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-2-5	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-2-6	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-2-7	Log Sawing; MHDR = 10.0 tons/hr	19.2
EU-2-8	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-3-1	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-3-2	Log Sawing; MHDR = 19.7 tons/hr	30.2
EU-3-3	Log Sawing; MHDR = 17.5 tons/hr	27.9
EU-3-4	Log Sawing; MHDR = 36.2 tons/hr	41.6

Emission Unit	Description	PM Emission Limit (pounds/hour)
EU-3-5	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-3-6	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-3-7	Log Sawing; MHDR = 36.2 tons/hr	41.6
EU-3-8	Log Sawing; MHDR = 10.0 tons/hr	19.2
EU-07	Silo Storage; MHDR = 5 tons/hr	12.1
EU-08	Wood Waste Storage Bin; MHDR = 5 tons/hr	12.1

Monitoring/Recordkeeping:

1. The permittee shall retain the potential to emit calculations in Attachment E which demonstrate that the above emission limitations will not be exceeded.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be kept for a period of five years.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 003
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit No. 112000-009, Issued November 3, 2000

Emission Unit	Description	
EU-01 Process Line #1		
EU-1-7	Log Sawing; MHDR = 10.0 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-01)
Storage Unit		
EU-08	Wood Waste Storage Bin; MHDR = 5 tons/hr	Partial Enclosure: 50% control efficiency
Haul Road		
EU-11	Haul Road for Sawdust	

Emission Limitation:

- 1) The permittee shall not discharge into the atmosphere from the Williams Crusher (EU-1-7), the Storage Bin (EU-08) and the Haul Road (EU-11) particulate matter less than ten micron (PM₁₀) in excess of 15 tons in any consecutive 12-month period. [Special Condition 1.A]
- 2) The permittee shall control emissions from the Williams Crusher (EU-1-7) using baghouses. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources personnel may easily observe them. Replacement filters for the baghouses and drum filters shall be

kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance and abrasion resistance). [Special Condition 2.A]

Monitoring/Record Keeping:

- 1) The permittee shall use Attachment F or an equivalent for approved by the Air Pollution Control Program to record emissions of PM₁₀ in order to demonstrate compliance with the PM₁₀ emission limit. The permittee shall maintain all records for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition 1.B]
- 2) The permittee shall monitor and record the operating pressure drop across the baghouses and drum filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition 2.B]
- 3) The permittee shall maintain an operating and maintenance log for the baghouses and drum filters which shall include the following: [Special Condition 2.C]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probably cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions and replacements, etc.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicated that the source exceeds the PM₁₀ emission limit.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 004
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit No. 112000-009, Issued November 3, 2000

Emission Unit	Description	
EU-01 Process Line #3		
EU-3-3	Log Sawing; MHDR = 17.5 tons/hr	Controlled by low temperature Fabric Filter:49.5% control efficiency (CD-02)
EU-3-8	Log Sawing; MHDR = 10.0 tons/hr	

Operational Limitation:

Baghouses shall be in use at all times when the cut-off saw (EU-3-3) and Williams Hog (EU-3-8) are in operation, and shall be operated and maintained in accordance with the manufacturer’s specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources personnel may easily observe them. Replacement filters for the baghouses and drum filters shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance and abrasion resistance). [Special Condition 1]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition 2.B]
2. The permittee shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 005 10 CSR 10-6.405 Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating
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Emission Unit	Description	
	Wood Boiler	
EU-04	15.1 MMBtu/hr Wood Fired Boiler (20% moisture); MHDR = 0.76 tons/hr	Controlled by Multi-cyclone with fly ash reinjection: 80% control efficiency (CD-03)

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.52 pounds per MMBtu of heat input from EU-04 Wood Fired Boiler.

Monitoring/Recordkeeping/Reporting:

The permittee shall maintain a copy of the Statement of Basis which contains calculations demonstrating that EU-04 Wood Fired Boiler will not exceed the particulate matter emission limit.

PERMIT CONDITION 006
 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Unit	Description	
Wood Boiler		
EU-04	15.1 MMBtu/hr Wood Fired Boiler (20% moisture); MHDR = 0.76 tons/hr	Controlled by Multi-cyclone with fly ash reinjection: 80% control efficiency (CD-03)

Emission Limitation:

The permittee shall not emit sulfur dioxide in excess of 8.0 pounds per MMBtu of heat input from EU-04 Wood Fired Boiler.

Monitoring/Recordkeeping/Reporting:

The permittee shall maintain a copy of the Statement of Basis which contains calculations demonstrating that EU-04 Wood Fired Boiler will not exceed the sulfur dioxide emission limit.

PERMIT CONDITION 007
 10 CSR 10-7.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources

Emission Unit	Description	
Wood Boiler		
EU-04	15.1 MMBtu/hr Wood Fired Boiler (20% moisture); MHDR = 0.76 tons/hr	Controlled by Multi-cyclone with fly ash reinjection: 80% control efficiency (CD-03)

Operational Limitations:

- 1) The permittee must conduct an initial tune-up as specified in §63.11214 and conduct a tune-up of the boiler biennially as specified in §63.11223. [§63.11201(b) From Table 2 of Subpart JJJJJJ]
- 2) The boiler must have a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include the following: [§63.11201(b) From Table 2 of Subpart JJJJJJ]
 - a) A visual inspection of the boiler system;
 - b) An evaluation of operating characteristics of the affected boiler systems specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints;
 - c) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator;
 - d) A review of applicable architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - e) A list of major energy conservation measures that are within the facility’s control;
 - f) A list of the energy savings potential of the energy conservation measures identified; and
 - g) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

- 3) At all times, the permittee must operate and maintain the boiler in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.11205(a)]

Compliance Requirements:

- 1) The permittee must demonstrate initial compliance no later than the compliance date that is specified in §63.11196 (March 21, 2014) and according to the applicable provisions in §63.7(a)(2). [§63.11210 (c)]
- 2) The permittee must conduct a performance tune-up according to §63.112239b) and must submit a signed statement in the Notification of Compliance Status report that indicates that a tune-up of the boiler was conducted and that an energy assessment of the boiler and its energy uses systems was completed. [§63.11214(b) and (c)]
- 3) In order to demonstrate continuous compliance the permittee must keep records as required in §63.11225(c) and must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223(a)]

Notification/Reporting/Record Keeping Requirements:

- 1) The permittee must prepare and submit a biennially by March 1 a compliance certification containing the following information: [§63.11225(b)(1) through (4)]
 - a) Company name and address;
 - b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - i. "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler," and
 - ii. "No secondary materials that are solid waste were combusted in any affected unit."
 - c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- 2) The permittee must keep a copy of each notification and report that is submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted. [§63.11225(c)(1)]
- 3) The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required: [§63.11225(c)(2)]
- 4) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- 5) All records must be in a form suitable and readily available for expeditious review. Records must be kept for 5 years following the date of each recorded action. Records must be kept on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. Records may be kept off site for the remaining 3 years. [§63.11225(d)]
- 6) The permittee shall submit reports to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.
- 7) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 008
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 0387-009A, Issued March 23, 1987

Emission Unit	Description	
Wood Boiler		
EU-04	15.1 MMBtu/hr Wood Fired Boiler (20% moisture); MHDR = 0.76 tons/hr	Controlled by Multi-cyclone with fly ash reinjection: 80% control efficiency (CD-03)

Special Condition:

The permittee shall operate a particulate matter control system which shall be at least 70 percent efficient at removing the particulate emissions generated by the operation of the wood fired boiler. This control device shall be operated at any time that the boiler is in operation.

PERMIT CONDITION 009
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 112011-003, Issued November 2, 2011

Emission Unit	Description	
Dip Tank		
EU-14	Microbicide Dip Tank; MHDR = 3750 board feet per hour or 56 gallons solution per hour and 1.1 gallons microbicide concentrate per hour	

Emission Limitation:

The permittee shall emit less than 5.0 tons of glycol ethers in any consecutive 12-month period from the open air dip tank. [Special Condition 1.A]

Monitoring/Record Keeping:

Attachment G or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitation. [Special Condition 1/B] The permittee shall maintain all records required for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon requires. These records shall include Material Safety Data Sheets (MSDS) for all materials used. [Special Condition 1.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 during which the records required by Special Condition 1.B show an exceedance of the emission limitation. [Special Condition 1.D]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.

- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170 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 the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) 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 10-6.165 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.

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*

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

V. General Permit Requirements

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

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

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None.

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

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

10 CSR 10-6.020(2)(R)12 Responsible Official

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment C

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

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

ATTACHMENT E

10 CSR 10-6.400 Compliance Demonstration for Permit Condition 002

Maximum allowable PM Emissions = $E \text{ (lb/hr)} = 4.1(P)^{0.67}$ for $P \leq 30 \text{ tons/hr}$
 $E \text{ (lb/hr)} = 55 (P)^{0.11} - 40$ for $P > 30 \text{ tons/hr}$

Where: P = Process weight (tons/hr)
 E = Allowable emission rate limit (lb/hr)

Potential PM Emission Rate =
 MHDR (tons/hr) x Emission Factor (lb/ton) x (1-Control Efficiency/100)

Emission Unit	Maximum Hourly Design Rate (tons/hr)	PM Emission Factor (lb/ton)	Control Device Efficiency (%)	Potential PM Emission Rate (lb/hr)	Allowable PM Emission Rate (lb/hr)
EU-1-1	36.2	0.20	49.5	3.66	41.62
EU-1-2	36.2	0.20	49.5	3.66	41.62
EU-1-3	36.2	0.20	49.5	3.66	41.62
EU-1-4	36.2	0.20	49.5	3.66	41.62
EU-1-5	36.2	0.20	49.5	3.66	41.62
EU-1-6	36.2	0.20	49.5	3.66	41.62
EU-1-7	10.0	0.20	49.5	1.01	19.18
EU-1-8	36.2	0.20	49.5	3.66	41.62
EU-2-1	36.2	0.20	49.5	3.66	41.62
EU-2-2	20.3	0.20	49.5	2.05	30.82
EU-2-3	36.2	0.20	49.5	3.66	41.62
EU-2-4	36.2	0.20	49.5	3.66	41.62
EU-2-5	36.2	0.20	49.5	3.66	41.62
EU-2-6	36.2	0.20	49.5	3.66	41.62
EU-2-7	36.2	0.20	49.5	3.66	41.62
EU-2-8	36.2	0.20	49.5	3.66	41.62
EU-3-1	36.2	0.20	49.5	3.66	41.62
EU-3-2	19.7	0.20	49.5	1.99	30.20
EU-3-3	17.5	0.20	49.5	1.77	27.90
EU-3-4	36.2	0.20	49.5	3.66	41.62
EU-3-5	36.2	0.20	49.5	3.66	41.62
EU-3-6	36.2	0.20	49.5	3.66	41.62
EU-3-7	36.2	0.20	49.5	3.66	41.62
EU-3-8	10.0	0.20	49.5	1.01	19.18
EU-07	5.0	0.58	90.0	0.29	12.05
EU-08	5.0	1.20	50.0	3.00	12.05

ATTACHMENT G
 Construction Permit No. 112011-003
 Permit Condition 009 Compliance Worksheet

This sheet covers the month of _____ in the year _____.

Column 1	Column 2	Column 3	Column 4 (a)	Column 5 (b)
Material Used (Name)	Amount of Material Used (Include Units)	Density (Pounds per Gallon)	Glycol Ether Content (Weight %)	Glycol Ether Emissions (Tons)
Busan 1009			60%	
Others....				
(c) Total Glycol Ether Emissions Calculated for this Month in Tons:				
(d) Last Month's 12-Month Glycol Ether Emissions Total, in Tons:				
(e) Previous Year's Monthly Glycol Ether Emissions Total, in Tons:				
(f) Current 12-month Total of Glycol Ether Emissions in Tons: [(c) + (d) - (e)]				

Instructions: This worksheet must include all materials containing glycol ethers used in the microbicide dip tank (EU-10)

- (a) Glycol ether content should be obtained from the Material Safety Data Sheet (MSDS). If the content is given as a range, then the maximum value should be used.
- (b) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
 2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
 3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5];
- (c) Summation of [Column 5] in Tons;
- (d) 12-Month glycol ether emissions (f) from last month's Attachment A in Tons;
- (e) 1-Month glycol ether emissions total (c) from the previous year's Attachment A in Tons; and
- (f) Calculate the new 12-month glycol ether emissions total. A 12-Month glycol ether emissions total (f) of less than **5.0** tons indicates compliance.

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received December 1, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received June 4, 2014; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) WebFIRE;
- 5) Construction Permit 0184-012, Issued January 5, 1984;
- 6) Construction Permit 0387-009, Issued March 30, 1987;
- 7) Construction Permit 0192-005, Issued January 13, 1992;
- 8) Construction Permit 0497-022, Issued April 21, 1997;
- 9) Construction Permit 0797-020, Issued July 17, 1997;
- 10) Construction Permit 112000-009, Issued November 16, 2000;
- 11) Construction Permit 112011-003, Issued November 2, 2011; and
- 12) Operating Permit OP2009-039, Issued December 1, 2009.

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.

40 CFR Part 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources* was applied to EU-04 Wood Fired Boiler.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

10 CSR 10-3.060 *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating* no longer applies to EU-05 Wood Fired Boiler. This regulation was rescinded October 30, 2011 and replaced by 10 CSR 10-6.405.

Construction Permit History

The following construction permits have been issued to this installation:

Permit No.	Date Issued	Description	Operating Permit Condition
0184-012	1/5/1984	Install new 10 MMBtu hardwood fired boiler	None
0387-009A	3/30/1987	To replace existing boilers with a new wood-fired boiler	Permit Condition 008
0192-005	1/13/1992	Add new processing line and replace sawdust storage building with a storage silo	None
0497-022	4/21/1007	Extension of the existing Peerless Bin	None
0797-020	7/17/1997	Cut-off saw and Williams hog	Permit Condition 004
112000-009	11/16/2000	Addition of a new wood crusher	Permit Condition 003
112011-003	12/1/2009	Addition of a microbicide dip tank for the treatment of green lumber	Permit Condition 009

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* does not apply to EU05, the 15.1 MMBtu wood fired boiler because it has a maximum heat input rate capacity less than 100.0 MMBtu/hr.

40 CFR Part 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* does not apply to EU05, the 15.1 MMBtu wood fired boiler because it did not commence construction after June 9, 1989.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters* does not apply to EU-05, the 15.1 MMBtu wood fired boiler because this facility is not a major source of HAPs.

40 CFR Part 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources* does apply to EU-05 the 15.1 MMBtu wood fired boiler. It is an existing source as defined by the subpart. For existing biomass boilers, the

requirements include an initial and biennial tune-ups and a one-time energy assessment. Operational, initial and continuing compliance, reporting, and record keeping requirements are included in the operating permit under Permit Condition 007.

40 CFR Part 63 Subpart DDDD, *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products* does not apply to this installation because it does not manufacture oak plywood and the facility is not a major source of HAP emissions.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	39.68
HAP	7.66
NO _x	32.4
PM ₁₀	<100
PM _{2.5}	N/D
SO _x	1.65
VOC	6.22

Potential to emit for CO, NO_x, and SO_x were calculated using emission factors from WebFIRE for SCC Code 10200908 for the Wood Fired Boiler assuming 8760 hours of operation per year at maximum heat capacity. Potential to emit for PM₁₀ is limited by the Plantwide emission limitation in Permit Condition PW001. Potential to emit for HAPs and VOC was determined by combining the conditioned PTE from the microbicide dip tank (from Construction Permit 112011-003) and the PTE from the wood fired boiler assuming 8760 hours of operation at maximum heat capacity.

Other Regulatory Determinations

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating*

The particulate matter emission limitation for EU-04 Wood Fired Boiler is:

$$E = 1.31Q^{-.338}, \text{ where } Q = 15.1$$

$$E = 1.31(15.1)^{-.338} = 0.52 \text{ lb/MMBtu}$$

The emission factor for particulate matter (uncontrolled) from WebFIRE for SCC code 10200908 is:

$$\text{EF PM}_{\text{filterable}} = 0.33 \text{ lb/MMBtu}$$

$$\text{EF PM}_{\text{condensable}} = 0.017 \text{ lb/MMBtu}$$

$$\text{Total PM Emission Factor} = \text{EF PM}_{\text{filt}} + \text{EF PM}_{\text{cond}} = 0.33 + 0.017 = 0.347 \text{ lb/MMBtu}$$

Since 0.347 lb/MMBtu is less than the emission limit of 0.52 lb/MMBtu, the boiler will never exceed the emission limitation, therefore no monitoring, recordkeeping or reporting is required for Permit Condition 005 for this emission unit.

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

The emission limitation under this rule for EU-04 Wood Fired Boiler is 8 lb of sulfur dioxide per MMBtu actual heat input.

The sulfur dioxide emission factor from WebFIRE for SCC code 10200908 is 0.025 lb/MMBtu. According to this emission factor, the boiler will never exceed the sulfur dioxide emission limit therefore no monitoring, recordkeeping or reporting is required for Permit Condition 006 for this emission unit.

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

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

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

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

Response to Public Comments

The draft Intermediate Operating Permit for Missouri Hardwood Flooring, (203-0005) was placed on public notice as of February 13, 2015 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: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. On February 26, 2015, the Air Pollution Control Program received comments from Mark Smith, EPA Region 7. The comments are addressed below in the order in which they appear within the e-mail.

Comments submitted by Mark Smith, USEPA:

Comment #1: The emission limitation in Permit Condition PW001 says “the permittee shall not cause or allow the emission of particulate matter of a diameter of less than or equal to 10 microns (PM10) in excess of 100 tons in any consecutive 12-month period.” Missouri Hardwood Flooring has taken this voluntary limit on PM10 emissions to remain below the major level in order to obtain the Intermediate State Permit to Operate. However this emission limitation as presented in this draft operating permit, fails to identify the emission units(s) subject to this limitation. Additionally, Permit Condition PW001 requires the permittee to maintain an accurate record of actual monthly throughput for all emission units and monthly emissions are calculated using Attachment H, or approved equivalent. Attachment H, however includes emission factors and control device efficiency factors which are neither referenced nor include any statement of basis supporting the use of these emission factors and efficiencies. Therefore, EPA would find Attachment H to not be enforceable from a practical matter.

To effectively limit Missouri Hardwood Flooring's PM10 emissions as specified, the PM10 must apply at all times to all actual emission units, and all actual PM10 emission units must be considered in determining compliance with the limit. The draft operating permit is unclear whether all actual PM10 emissions must be considered in determining compliance with these limits. In its response to a petition file against the Hua Honua Bioenergy Facility, the EPA reiterates that for purposes of determining the potential-to-emit (PTE) of a stationary source, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Thus, emissions for all emission units that are part of the sources physical and operational design (entire installation) must be included in calculating PTE for purposes of determining limitation compliance, including emission units that have been designated as “without limitation” and any designated “insignificant activities.” Similarly, EPA has previously explained that when a source accepts a source-wide limit for a pollutant, all actual emissions of that pollutant from the source must be considered in determining compliance with the limit. EPA recommends MDNR revise PW001 to ensure the source-wide PM10 emission limit is enforceable by including the list of emission units that make up “all emission units.” MDNR should also clarify in the operating permit that the limit applies at all times to all actual source-wide PM10 emissions and that all actual PM10 emission units must be considered in determining compliance with the limit. Finally, in order to assure the practical enforceability of Attachment H, EPA recommends MDNR provide references to both emission factors and control device efficiencies.

Response to Comment: The 100 ton per year PM10 limitation in Permit Condition PW001 is a “plant wide” permit condition. By definition this means that the PM10 limit applies plant wide to all emission sources of PM10, both emission units with unit specific limitations, emission units without specific limitations and all insignificant activities. A statement has been added to the permit on page 5 under Plant Wide Emission Limitations clarifying this. In order to clarify what is needed to demonstrate compliance Permit Condition PW001 has been improved to state the following:

Monitoring/Record Keeping:

- 1) The permittee shall maintain an accurate record of actual monthly throughput for all emission units which emit PM₁₀.
- 2) The monthly emissions of PM₁₀ for each emission unit shall be calculated by tracking the monthly throughput of each point source of PM₁₀ and multiplying by the emission factor (from the Emissions Inventory Questionnaire), and any applicable control device efficiency. Emissions of PM₁₀ from all sources are to be summed monthly.
- 3) The permittee shall calculate the rolling 12-month total of PM₁₀ emissions by summing the monthly emissions of each emission unit for the last 12 months.
- 4) The permittee shall maintain records of all information used to demonstrate compliance with the PM₁₀ emission limit and include the source of the emission factors used and verification of the control device efficiency used.
- 5) All records shall be kept for no less than five years and be made available to Department of Natural Resources personnel upon request.

Attachment H has been removed from the permit.

Comment #2: Permit Condition 001 and Permit Condition 002 both include a table identifying emission units subject to the opacity standard for emission of visible air contaminants and restriction of particulate matter from industrial processes, respectively. The tables also include a description of each emission unit and provides control device information. However, the draft operating permit fails to include a reference and/or any statement(s) regarding the basis of the control device efficiency. Attachment E, or an approved equivalent, has been included in the draft operating permit to be used by the permittee to calculate and verify compliance with Permit Condition 002. However as stated previously, Attachment E should include references for the control device efficiencies to ensure that Attachment E is practically enforceable. EPA recommends MDNR define the source of control device efficiency in Permit Conditions 001 and 002 and include on Attachment E.

Response to Comment: The control device efficiencies for the control equipment used with the emission units listed in Permit Condition 001 and 002 were provided by the permittee during the review process either in a construction permit, EIQ, or the previous operating permit. This application is signed by the responsible official certifying that the information submitted and reviewed is “true, accurate and complete.” The control device efficiencies for the equipment in question are reasonable and therefore the permittee was taken at its word that the information is accurate. If it is determined during inspection that the control device efficiencies are not accurate appropriate action will be taken by MDNR enforcement personnel. No changes have been made to the permit or the Attachment.

Comment #3: Permit Condition 003 establishes an emission limitation applicable to emission units EU-1-7, EU08 and EU-11 of 15 tons of particulate matter less than ten microns (PM10) in any consecutive 12-month period. The draft operating permit includes Attachment F, or approved equivalent, for the

permittee to record emissions of PM10 in order to demonstrate compliance. However, Attachment F only addresses emissions from the Williams Crusher, EU-1-7. Also, Attachment F includes as emission factor and Permit Condition 003 includes control device efficiencies which the EPA believes are not practically enforceable as described above. Therefore, EPA recommends MDNR include all emission units on Attachment F to demonstrate compliance with the emission limit and include references to support the validity of the emission factors and control device efficiency.

Response to Comment: The emission factor on Attachment F for the Williams Crusher (EU-1-7) is a composite emission factor that takes into account the emissions from the haul road and the storage bin based on the amount of material processed in the crusher. For this reason only the throughput of the crusher is needed to determine compliance with the 15 ton per year PM10 limit. A note was added on Attachment F to explain.

Comment #4: Permit Condition 004 includes operational limitations on emission units EU-3-3 and EU-3-8. However Permit Condition 004 does not include any monitoring and/or recordkeeping to be used by the permittee to validate compliance. EPA recommends MDNR include periodic monitoring and recordkeeping that allows Missouri Hardwood Flooring to verify compliance in Permit Condition 004.

Response to Comment: Monitoring and recordkeeping requirements have been added to Permit Condition 004.

Comment #5: Permit Condition 007 requires the permittee to conduct an initial tune-up of EU-04 (Wood-Fired Boiler) and conduct a tune-up biennially. Permit Condition 007 also requires the permittee to demonstrate compliance no later than March 21, 2014. Therefore, it appears that the initial tune-up is not an applicable requirement and more appropriately should be discussed in the Statement of Basis. Permit Condition 007 also requires the permittee to prepare and submit biennially by March 1 a compliance certification. Biennially signifies an activity that occurs every two years. Therefore, EPA believes it would be appropriate for MDNR to include the year the first certification is due. Finally, the notification/reporting/recordkeeping requirement #6, in Permit Condition 007, requires the permittee to submit compliance information to MDNR. The permit condition incorporates applicable MACT requirements associated with Industrial, Commercial and Institutional Boiler from area sources of hazardous air pollutants. EPA is tasked with the management of the compliance associated with the area source MACT for ICI boilers and therefore EPA should be listed as the primary recipient of compliance information associated with Permit Condition 007.

Response to Comment: EPA has been added as the recipient of compliance information associated with Permit Condition 007. Because the compliance demonstrations, and subsequent biennial compliance certifications do not come directly to the Air Program but are sent to EPA (as the primary recipient) it is not known the exact date on which the first tune-up was performed or when the compliance certification was submitted, therefore the permit has not been changed, other than to remove the March 21, 2014 date, which has passed and is no longer applicable. Enforcement of compliance with this area source MACT rests with EPA.