



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: **QP2012-035**
Expiration Date: **SEP 10 2017**
Installation ID: **510-2433**
Project Number: **2010-11-008**

Installation Name and Address

New World Pasta
611 East Marceau Street
St. Louis, MO 63111
County - City of St. Louis

Parent Company's Name and Address

New World Pasta
85 Shannon Road
Harrisburg, PA 17112

Installation Description:

New World Pasta is a pasta producing facility. Flour and other powdered ingredients are mixed with water to form a paste. This paste is then extruded through various dies to form the different styles and thicknesses of pasta. The pasta is dried, packaged and shipped to distributors. New World Pasta is a major source because it has the potential to emit more than ten (10) tons per year of bromomethane (methyl bromide) and more than one hundred (100) tons per year of particulate matter less than or equal to ten microns (PM₁₀), and was issued a Part 70 operating permit (OP2006-016). New World Pasta has accepted voluntary, federally enforceable emission limitations limiting the emissions of bromomethane to less than the major source level of ten (10) tons per year and PM₁₀ emissions to less than major source level to qualify for this permit.

SEP 11 2012

Effective Date

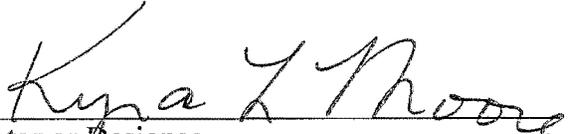

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

New World Pasta is a pasta producing facility. Flour and other powdered ingredients are mixed with water to form a paste. This paste is then extruded through various dies to form the different styles and thicknesses of pasta. The pasta is dried, packaged and shipped to distributors. New World Pasta is a major source because it has the potential to emit more than ten (10) tons per year of bromomethane (methyl bromide) and more than one hundred (100) tons per year of particulate matter less than or equal to ten microns (PM₁₀), and was issued a Part 70 operating permit (OP2006-016). New World Pasta has accepted voluntary, federally enforceable emission limitations limiting the emissions of bromomethane to less than the major source level of ten (10) tons per year and PM₁₀ emissions to less than major source level to qualify for this permit.

The reported actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.80	0.87	1.02	0.97	1.02
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.80	0.87	1.02	0.97	1.02
Sulfur Oxides (SO _x)	0.02	0.03	0.03	0.03	0.03
Nitrogen Oxides (NO _x)	3.93	5.28	5.61	5.46	5.58
Volatile Organic Compounds (VOC)	0.21	0.29	0.30	0.30	0.30
Carbon Monoxide (CO)	3.30	4.44	4.71	4.58	4.69
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)*	4.40	4.40	4.40	0.00	0.00
Ammonia (NH ₃)	0.12	0.16	0.17	0.17	0.17

* Bromomethane (methyl bromide), CAS 74-83-9

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 #	EQ Reference #	Description of Emission Unit
EU0010	EP-05	Flour Silo Load System Filter House (F01 – F08)
EU0020	EP-25	T03 Re grind Filter House – Hammermill
EU0030	EP-26	T04 Re grind Filter House – Hammermill
EU0500	EP-33	Plant Fumigation

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.

Emission Unit #	EQ Reference #	Description of Emission Unit
EU0080	EP-01	Flour Weigh Silo T01 Bag Filter Line 1 – Pneumatic Transfer (vents indoors)
EU0090	EP-02	Flour Weigh Silo T01 Bag Filter Line 2 – Pneumatic Transfer (vents indoors)
EU0100	EP-03	Flour Weigh Silo T02 Bag Filter Line 2 – Pneumatic Transfer (vents indoors)
EU0110	EP-04	Flour Weigh Silo T02 Bag Filter Line 1 – Pneumatic Transfer (vents indoors)
EU0120	EP-06	#1 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0130	EP-07	#2 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0140	EP-08	#3 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0150	EP-09	#4 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0160	EP-10	#5 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0170	EP-12	#7 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0180	EP-13	#8 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0190	EP-14	#9 Press Feed – Pneumatic Powdered Material Transfer (vents indoors)
EU0200	EP-16	#1 Press Recycle – Pneumatic Transfer (vents indoors)
EU0210	EP-17	#2 Press Recycle – Pneumatic Transfer (vents indoors)
EU0220	EP-18	#3 Press Recycle – Pneumatic Transfer (vents indoors)
EU0230	EP-19	#5 Press Recycle – Pneumatic Transfer (vents indoors)
	EP-20	Four (4) 8.369 MMBtu/hr each Natural Gas-fired Boilers (Brunham, Model 3PW-200-50-G-PF (200HP), Installed January 2012.
EU0240	EP-21	Non-Egg Tailing Recycle Storage Silo (T05) – Pneumatic Transfer
EU0250	EP-23	Non-Egg Tailing Recycle Storage Silo (T04) – Pneumatic Transfer (vents indoors)
EU0260	EP-24	Non-Egg Tailing Recycle Storage Silo (T03) – Pneumatic Transfer (vents indoors)
EU0270	EP-27	Non-Egg Re grind Silo Load System (R01) – Pneumatic Transfer (vents indoors)
EU0280	EP-28	Non-Egg Re grind Silo Load System (R02) – Pneumatic Transfer (vents indoors)
EU0290	EP-29	Non-Egg Re grind Silo Load System (R03) – Pneumatic Transfer (vents indoors)
EU0300	EP-30	White Flour (Non-Egg, Non HH) Re grind Silo Load System (R04) – Pneumatic Transfer (vents indoors)
EU0310	EP-34	#4 Press Recycle – Pneumatic Transfer (vents indoors)
EU0320	EP-35	Non-Egg Ingredient Tailing Recycle Storage Silo (E05) – Pneumatic Transfer (vents indoors)

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0340	EP-37	200 gallon Used Oil Storage Tank
EU0350	EP-38	250-hp Temporary Air Compressor
EU0360	EP-39	200 gallon Temporary Air Compressor Diesel Tank
EU0370	EP-40	Healthy Harvest Sifter Receiver 14 (vents indoors)
EU0380	EP-41	Healthy Harvest Sifter Receiver 15 (vents indoors)
EU0390	EP-42	Non-egg Ingredient TO-6 Tailing Recycling Storage Silo (vents indoors)
EU0400	EP-43	01007 Cyclone Collector (vents indoors)
EU0410	EP-44	02010 Cyclone Collector (vents indoors)
EU0420	EP-45	02012 Vacuum System with In-Line Cartridge Filter (2) (vents indoors)
EU0430	EP-46	04010 Vacuum System with In-Line Cartridge Filter (vents indoors)
EU0440	EP-47	05011 Vacuum System with In-Line Cartridge Filter (vents indoors)
EU0450	EP-48	06005 Cyclone Collector (vents indoors)
EU0460	EP-49	06007 Vacuum System with In-Line Cartridge Filter (vents indoors)
EU0470	EP-50	Regrind Filter House – Egg Ingredient Pasta Hammermill (vents indoors)
EU0480	EP-51	T1 Based on Blower Limitation
EU0490	EP-52	T2 Based on Blower Limitation

II. Plant Wide Emission Limitations

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

Permit Condition PW001

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

Emission Limitation:

New World Pasta shall emit less than ten tons of methyl bromide in any consecutive 12-month period.

Monitoring/Recordkeeping:

New World Pasta shall maintain an accurate record of the usage of methyl bromide during plant fumigation (EP33). Plant fumigation using methyl bromide is the major source of HAP emissions. New World Pasta will limit their methyl bromide usage to 19,272 pounds per any consecutive 12-month period to keep the HAPs emissions below 10 tons per year. Example form is attached as Attachment A. New World Pasta may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the HAPs emission limitation (less than 10 tons in any consecutive 12-month period).

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after any exceedance or deviation from this permit condition.

Permit Condition PW002

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

Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 100 tons of particulate matter with an aerodynamic diameter of less than or equal to ten microns (PM₁₀) in any consecutive 12-month period.

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of emissions of PM₁₀ emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the PM₁₀ emissions from this installation. Example form is attached as Attachment B (Plant-wide Emissions Tracking Record). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the PM₁₀ emission limitation (less than 100 tons per consecutive 12-month period of PM₁₀).

Reporting:

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 any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

III. Emission Unit Specific Emission Limitations

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

EU0010 - Flour Silo Load System Filter House (F01 – F08) EU0020 - T03 Regrind Filter House Hammermill EU0030 - T04 Regrind Filter House Hammermill		
Emission Unit	Description	Emission Point #
EU0010	Flour Silo Load System Filter House (F01-08) – Pneumatic transfer of flour to one of the eight storage silos. All storage silos’ emissions are controlled by a common baghouse.	EP-05
EU0020	T03 Regrind Filter House Hammermill – Non-Egg ingredient pasta (HH, ST, 7G). Recycled pasta,, not containing eggs, is ground to a flour consistency for reuse in production. Process emissions controlled by a baghouse.	EP-25
EU0030	T04 Regrind filter house Hammermill. – White Pasta (non-Egg, non –HH). Typically used for non-egg product. Process emissions controlled by a baghouse.	EP-26

<p>Permit Condition EU0010-001, EU0020-001 and EU0030-001</p> <p>10 CSR 10-6.400</p> <p>Restriction of Emission of Particulate Matter From Industrial Processes</p>
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Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of:
 - a) 45.18 pounds per hour (lb/hr) from EU0010;
 - b) 4.10 lb/hr from EU0020; and
 - c) 8.56 lb/hr from EU0030.
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

Monitoring:

Operation of the emission units shall only occur with the baghouses (cartridge filters) in operation. To insure the proper function of the baghouses, the following shall be done:

- 1) The baghouses shall be maintained such that the pressure drop remains in the normal operating range (2.0 inches of water to 8.0 inches of water), whenever the emission unit(s) is in operation. A pressure drop reading of less than two inches may be observed for a period following the installation of a new bag.
- 2) All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacturer’s specifications and recommendations.

- 3) Check and document the baghouses' pressure drop weekly, whenever the emission unit(s) is in operation. If the pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal.
- 4) Check and document the cleaning sequence of the dust collector every six months.
- 5) Inspect bags for leaks and wear every six months.
- 6) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months..

Recordkeeping:

The permittee shall maintain records to verify compliance with the baghouse monitoring. These records shall include weekly baghouse pressure drop indicator readings and all dates of filter replacement, and all baghouse instrumentation calibrations (see Attachments C and D).

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 that the unit(s) deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the operating pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

Permit Condition EU0010-002, EU0020-002 and EU0030-002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20 percent.
- 2) Exception:
 - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lb/hr) of particulate matter shall be limited to 40 percent opacity.
 - b) 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 an opacity up to 40 percent.

Monitoring:

- 1) The permittee shall conduct opacity readings on the emission unit(s) 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(s) 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) Observations must be made once per month. If a violation is noted, then

- b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment E), 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 Method 9 test performed in accordance with this permit condition. (See Attachment F)

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 annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

IV. Core Permit Requirements

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

City of St. Louis Ordinance 68657, §16 Open Burning Restrictions

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

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

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

the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) 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 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

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

- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.

- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

- 1) Recordkeeping
 - 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, recordkeeping, 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 semi-annually (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 recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

**Attachment F: Method 9 Opacity Emissions Observation
 10 CSR 10-6.220 Compliance Demonstration**

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

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 November 2, 2010; revised May 2, 2012;
- 2) 2011 Emissions Inventory Questionnaire, received April 27, 2012;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) City of St Louis Air Pollution Control Program Construction Permits and Source Registration Permits:

Permit Number	Description
H018, H019 & H020	16.74 MMBtu/hr each Industrial Boilers (Boiler #1, Boiler #2 and Boiler #3)
04-06-011	Replaces Permit #s H018, H019 & H20
04-06-011A	Amendment to Permit #04-06-011
SR10.035	Replacement of Existing Production Line 5 with a new Production Line 5
SR11.006	Installation of a New Production Line 6

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645.
These ordinances were reviewed and considered at the time the application for this permit was submitted. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 68657. The only section of Ordinance 65645 that corresponds to a rescinded ordinance included in the State SIP and therefore federally enforceable is Section 16 - Open Burning

Restrictions. This section of the new ordinance is the only section included in the operating permit at this time.

Construction Permit Revisions

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

- 1) City of St. Louis Construction Permit #04-06-011, 04-06-011A and H018, H019 & H020:
Since the three (3) 16.74 MMBtu/hr each Industrial Boilers (Boiler #1, Boiler #2 and Boiler #3) are removed and replaced with four new boilers, each with maximum rated capacity of 8.369 MMBtu/hr, the conditions of the construction permits are not applicable to the facility.

The new boilers are considered as like kind replacement per state rule 10 CSR 10-6.061(3)(B)3. Furthermore, each boiler (natural gas-fired) less than ten MMBtu/hr is exempt from construction permit requirements.

- 2) The construction permits issued to New World Pasta by the City of St. Louis APCP required the installation to report emissions yearly on the Emissions Inventory Questionnaire. Since the emission reporting [10 CSR 10-6.110, *Submission of Emission Data, Emission Fees and Process Information*] is included in the core permit requirements section of this permit, the yearly emissions reporting conditions of the construction permits are not included in the operating permit.

New Source Performance Standards (NSPS) Applicability

40 CFR §60 Subpart Dc—*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*

Subpart Dc applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

Subpart Dc does not apply to this installation. The maximum rated capacity of each boiler is below the applicability threshold of the subpart Dc (< 10 MMBtu/hr)

Maximum Achievable Control Technology (MACT) Applicability

- 1) 40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*
The Subpart applies to a facility that owns or operates a industrial boilers, institutional boilers, commercial boilers, and process heaters that is a major source, or is located at a major source, or is part of a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water.

New World Pasta is an area source of HAPs, therefore the provisions of 40 CFR Part 63, Subpart DDDDD do not apply to this installation.

2) 40 CFR Part 63, Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers - Area Sources*

This regulation applies to boilers at area source facilities that burn coal, oil, biomass, or non-waste materials. Boilers burning natural gas as defined in this regulation would not be affected by this rule.

This regulation does not apply to the boilers because these boilers are natural gas fired boilers. The rule exempts natural gas fired boilers. According to this rule, gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M - *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

This regulation has been included in the operating permit because it applies to any demolition or renovation (as outlined in 40 CFR 61.145) of buildings containing asbestos at the installation. containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Other Regulatory Determinations

- 1) With the acceptance of permit condition PW001, which limits the emissions of methyl bromide, New World Pasta no longer has the potential to emit more than ten (10) tons per year of bromomethane (methyl bromide), CAS 74-83-9, which is classified as a hazardous air pollutant (HAP). The bromomethane emissions are as a result of plant wide space fumigation and are considered fugitive in nature. There are currently no federal regulations to mitigate bromomethane emissions from pasta manufacturing installations.
- 2) EU0350 is typically brought on site once per quarter for five days at a time for use when permanent electric air compressors are undergoing maintenance. EU0360 is the temporary diesel tank with containment associated with EU0350.
- 3) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*.
The four boilers use exclusively pipeline grade natural gas as defined in 40 CFR 72.2. They are exempt from this rule as per 10 CSR 10-6.260(1)(A)(2).
- 4) 10 CSR 10-6.405, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*.
According to 10 CSR 10-6.405(1)(C), an installation is exempt from this rule if all of the installation's applicable units are fueled only by landfill gas, propane, natural gas, fuel oils #2 through #6 (with less than one and two-tenths percent (1.2 %) sulfur), or other gases (with hydrogen sulfide levels less than or equal to four (4) parts per million volume as measured using ASTM D4084, or equivalent and mercury concentrations less than forty (40) micrograms per cubic meter as measured using ASTM D5954, or ASTM D6350, or equivalent or any combination of these fuels.

All the indirect heating sources operated at this installation exclusively combust natural gas, therefore the installation is not subject to this rule.

- 5) 10 CSR 10-6.400, *Control of Emission of Particulate Matter From Industrial Processes*.
The following two tables provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate including particulate emission control equipment. Potentials to emit (PTE) presented below were calculated based on each sources maximum hourly design rates (MHDR).

Table 1 indicates that EU0010 can meet the allowable hourly mass emission limit without considering controls. However, as indicated in Table 2, this emission unit cannot meet the allowable grain loading limit unless controls are considered. EU0020 and EU0030 cannot meet either the allowable hourly mass emission limit or the allowable grain loading limit without considering controls. Therefore, pressure drop monitoring was included as an applicable requirement in the operating permit for all three of these emission units.

For Table 1: Potential to Emit:

$$\text{Uncontrolled PTE} \left(\frac{\text{lb}}{\text{hr}} \right) = \text{MHDR} \left(\frac{\text{tons}}{\text{hr}} \right) \times \text{Emission Factor} \left(\frac{\text{lb}}{\text{ton}} \right)$$

$$\text{Controlled PTE} \left(\frac{\text{lb}}{\text{hr}} \right) = \text{MHDR} \left(\frac{\text{tons}}{\text{hr}} \right) \times \text{Emission Factor} \left(\frac{\text{lb}}{\text{ton}} \right) \times (1 - \text{Control Efficiency})$$

Allowable PM Emissions:

For process weight rates of 60,000 pounds per hour (lb/hr) or less: $E = 4.10P^{0.67}$

and for process weight rates greater than 60,000 lb/hr: $E = 55.0P^{0.11} - 40$

where:

E = rate of emission in lb/hr; and

P = process weight rate in tons per hour (tons/hr)

Table 1

Emission Unit #	Maximum Design Rate (tons/hr)	PM Emission Factor (lb/ton)	Control Device Efficiency (%)	PM Potential Emissions (lbs/hr)		PM Allowable Emission Rate (lb/hr)
				Uncontrolled	Controlled	
EU0010	53.33	0.46 ¹	99.35	24.53	0.16	45.18
EU0020	1.00	52.69 ²	99.35	52.69	0.34	4.10
EU0030	3.00	52.69 ²	99.35	158.08	1.03	8.56

¹ AP42 Table 11.12-2 (6/06)

² Stack Test - 09/08/2004

Table 2 can be used to verify compliance with the limit of 0.3 grains/dscf.

$$SCFM = ACFM \left(\frac{T_{s \text{ tandard}}}{T_{actual}} \right) \left(\frac{P_{actual}}{P_{s \text{ tandard}}} \right)$$

EPA-defined standard conditions of temperature and pressure are 68°F (20°C) and 14.7 psia (760 mm Hg).

$$Emission\ Rate\left(\frac{grains}{dscf}\right) = \left(\frac{Emission\ Rate\left(\frac{lb}{hr}\right)}{Stack\ Flow\ Rate\left(\frac{scf}{min}\right) \times 60\left(\frac{min}{hr}\right)} \times 7000\left(\frac{grains}{lb}\right) \right)$$

Table 2

Emission Unit #	Uncontrolled PTE (lb/hr)	Controlled PTE (lb/hr)	Stack Temp. (°F)	Stack Flow Rate		Uncontrolled PTE (gr/scf)	Controlled PTE (gr/scf)
				ACFM	SCFM		
EU0010	24.53	0.16	100 ²	3000 ²	2636	1.09	0.01
EU0020	52.69	0.34	109 ¹	-----	1342 ¹	4.58	0.03
EU0030	158.08	1.03	109 ¹	-----	3356 ¹	5.50	0.04

¹ Stack Test - 09/08/2004

² Plant personnel estimate

Exemptions to 10 CSR 10-6.400 are shown below.

- a) The emission units listed below are exempt from this rule under 10 CSR 10-6.400(1)(B)7 because their emissions are fugitive to the building.

Table 3

Emission Unit	Emission Point	Description
EU0080	EP-01	Flour Weigh Silo T01 Bag Filter Line 1
EU0090	EP-02	Flour Weigh Silo T01 Bag Filter Line 2
EU0100	EP-03	Flour Weigh Silo T02 Bag Filter Line 2
EU0110	EP-04	Flour Weigh Silo T02 Bag Filter Line 1
EU0120	EP-06	#1 Press Feed
EU0130	EP-07	#2 Press Feed
EU0140	EP-08	#3 Press Feed
EU0150	EP-09	#4 Press Feed
EU0160	EP-10	#5 Press Feed
EU0170	EP-12	#7 Press Feed
EU0180	EP-13	#8 Press Feed
EU0190	EP-14	#9 Press Feed
EU0270	EP-27	Egg Regrind Silo Load System (R01)
EU0280	EP-28	Non-Egg Regrind Silo Load System (R02)
EU0290	EP-29	Non-Egg Regrind Silo Load System (R03)
EU0300	EP-30	Non-Egg Regrind Silo Load System (R04)
EU0370	EP-40	Healthy Harvest Sifter Receiver 14
EU0380	EP-41	Healthy Harvest Sifter Receiver 15
EU0400	EP-43	01007 Cyclone Collector (vents indoors)
EU0410	EP-44	02010 Cyclone Collector (vents indoors)
EU0420	EP-45	02012 Vacuum System with In-Line Cartridge Filter (2)
EU0430	EP-46	04010 Vacuum System with In-Line Cartridge Filter
EU0440	EP-47	05011 Vacuum System with In-Line Cartridge Filter
EU0450	EP-48	06005 Cyclone Collector

EU0460	EP-49	06007 Vacuum System with In-Line Cartridge Filter
EU0470	EP-50	Regrind Filter House – Egg Ingredient Pasta Hammermill

- b) The emission units listed below are exempt from this rule under 10 CSR 10-6.400(1)(B)7 because their emissions are fugitive to the building. They also have an uncontrolled potential to emit of less than one-half (0.5) pounds per hour of particulate matter at maximum design capacity and are therefore also exempt under 10 CSR 10-6.400(1)(B)11.

Table 4

Emission Unit	Emission Point	Description	MHDR (ton/hr)	PM Emission Factor ¹ (lb/ton)	Uncontrolled PTE (lb/hr)
EU0200	EP-16	#1 Press Recycle	0.2134	0.061	0.01
EU0210	EP-17	#2 Press Recycle	0.1992	0.061	0.01
EU0220	EP-18	#3 Press Recycle	0.1992	0.061	0.01
EU0230	EP-19	#5 Press Recycle	0.1067	0.061	0.01
EU0250	EP-23	Non-Egg Tailing Recycle Storage Silo (T04)	2.53	0.061	0.15
EU0260	EP-24	Egg Tailing Recycle Storage Silo (T03)	2.53	0.061	0.15
EU0310	EP-34	#4 Press Recycle	0.1423	0.061	0.01
EU0320	EP-35	Egg Tailing Recycle Storage Silo (E03)	2.53	0.061	0.15
EU0390	EP-42	Non-egg Ingredient TO-6 Tailing Recycling Storage Silo	0.5	0.061	0.03

¹ AP42 Table 9.9.1-1

- c) The emission unit listed below are exempt from this rule under 10 CSR 10-6.400(1)(B)11 because its uncontrolled potential to emit is less than one-half (0.5) pounds per hour of particulate matter at maximum design capacity.

Table 5

Emission Unit Number	Emission Point Number	Description	MHDR	PM Emission Factor	Uncontrolled PTE (lb/hr)
EU0240	EP-21	Non-Egg Tailing Recycle Storage Silo (T05)	1.0963 tons	0.061 lb/ton ¹	0.07
EU0480	EP-51	T1 Based on Blower Limitation	31260 cft	3.86E-07 lb/cft ²	0.0121
EU0490	EP-52	T2 Based on Blower Limitation	31260 cft	3.86E-07 lb/cft ²	0.0121

¹ AP42 Table 9.9.1-1

² Stack Test - 09/08/2004

6) Emission Units Without Limitations:

The emission units listed as units without limitations are not subject to any specific rule except the installation wide requirement of Permit Condition PW001 and PW002, 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s).

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

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

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

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

Prepared by:

Berhanu A. Getahun
Environmental Engineer

CERTIFIED MAIL: 70093410000193532191
RETURN RECEIPT REQUESTED

Mr. Chris Getsfred
New World Pasta
611 East Marceau Street
St. Louis, MO 63111

Re: New World Pasta, 510-2433
Permit Number: **OP2012-035**

Dear Mr. Getsfred:

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 do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/bgk

Enclosures

c: St. Louis Regional Office
PAMS File: 2010-11-008

MEMORANDUM

DATE: August 24, 2012

TO: 2010-11-008, New World Pasta

FROM: Berhanu A. Getahun, Environmental Engineer

SUBJECT: Response to Public Comments

The draft Intermediate Operating Permit for New World Pasta was public noticed on the Department's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on July 16, 2012 for a 30-day comment period. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.

BAG/kjc