

Air Pollution Control Program

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

PART 70

PERMIT TO OPERATE

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

Operating Permit Number: OP2018-070
Expiration Date: AUG 06 2023
Installation ID: 147-0005
Project Number: 2018-04-007

Installation Name and Address

Northwest Missouri State University
West 9th Street
Maryville, MO 64468
Nodaway County

Installation Description:

Northwest Missouri State University is an educational institution for higher learning. The installation operates a power plant consisting of three natural gas-fired boilers, a paper pellet/animal waste boiler, and a wood chip/animal waste boiler. Additional equipment includes wood chip, pellet, and ash storage piles, waste paper grinding, mixing and pelletizing animal waste with paper/wood chips, fuel storage tanks, parts cleaners, small heaters and boilers, crucible furnaces, aluminum and bronze casting, two natural gas-fired kilns, a wood-fired kiln, and ceramic glazing. The installation is a major source of sulfur oxides (SO_x), Nitrogen Oxides (NO_x), and Carbon Monoxide (CO).

Prepared by
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Operating Permit Unit

Director or Designee
Department of Natural Resources

AUG 06 2018

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Point	Description	Control Device ¹
EP-01	Boiler #1: fuel oil/natural gas-fired; 26 MMBtu/hr; installed 1958	-
EP-02	Boiler #2: natural gas/fuel oil-fired; 30 MMBtu/hr; installed 1962, modified 2014	-
EP-03	Boiler #3: fuel oil/natural gas-fired, 26 MMBtu/hr; installed 1966	-
EP-04	Boiler #4: paper pellet/animal waste-fired, 26 MMBtu/hr; installed 1966, modified 1993	CD-02 (Two-Stage Ash Collector Cyclone)
EP-05	Boiler #5: wood chip/animal waste-fired, 36 MMBtu/hr; installed 1981	CD-01 (High Efficiency Wet Scrubber)
EP-08	Waste Paper Grinder: 3 ton/hr	-
EP-09	Pelletizer: 3 ton/hr	-
EP-10	Gasoline Storage Tank (991 gal)	-
EP-14	Hammermill: 1.5 ton/hr	Cyclone
EP-15	Diesel Emergency Generator: 1.877 MMBtu/hr, installed 1976	-
EP-18B	Crucible Furnaces – Process: 0.10035 ton/hr	-
EP-19	Casting (Aluminum or Bronze): 0.005 ton/hr	-
EP-20B	Wood-fired Clay Kiln: 0.3 MMBtu/hr	-
EP-20C	Clay Kilns (Process): 0.10035 ton/hr	-

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Point	Description
EP-06	Wood Chip and Waste Paper Hauling (Haul Road)
EP-07	Wood Chip Storage Pile: 15 ton/hr
EP-11	Four (4) Diesel Storage Tanks (15,000 gal, 100 gal, 570 gal, and 991 gal)
EP-12	Parts Cleaners
EP-13	Natural Gas Combustion – Small Heaters/Boilers: 11.21 MMBtu/hr total
EP-14A	Mixer: 1.5 ton/hr
EP-14B	Animal Waste Pelletizer: 3 ton/hr
EP-16	Pellet Storage Pile (inside Pelletizing Plant building)
EP-17	Ash Storage: 0.1456 ton/hr
EP-18A	Crucible Furnaces – Natural Gas Combustion: 0.435 MMBtu/hr total
EP-20A	Two Natural Gas-Fired Clay Kilns: 0.55 MMBtu/hr total
EP-21	Ceramic Glazing: 0.02 ton/hr

¹ This table lists only control devices that are considered federally enforceable in this operating permit.

II. Plant Wide Emission Limitations

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

None.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001		
10 CSR 10-6.060 Construction Permits Required Construction Permit 122002-008, issued November 8, 2002		
Emission Point	Description	Control Device
EP-04	Boiler #4: paper pellet/animal waste-fired, 26 MMBtu/hr; installed 1966, modified 1993	CD-02 (Two-Stage Ash Collector Cyclone)
EP-05	Boiler #5: wood chip/animal waste-fired, 36 MMBtu/hr; installed 1981	CD-01 (High Efficiency Wet Scrubber)

Emission Limitations:

- 1) The permittee shall emit less than 40 tons of NO_x from the combustion of animal waste/paper pellets in EP-04 Boiler #4 and animal waste/wood chips in EP-05 Boiler #5 in any consecutive 12-month period. [Special Condition 1A]
- 2) The permittee shall emit less than 15 tons of PM₁₀ from the combustion of animal waste/paper pellets in EP-04 Boiler #4 and animal waste/paper pellets in EP-05 Boiler #5 in any consecutive 12-month period. [Special Condition 1B]

Monitoring/Recordkeeping:

- 1) The permittee shall use Attachments A and B or equivalent forms to demonstrate compliance with the NO_x and PM₁₀ limitations. [Special Condition 1C]
- 2) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the emission limitations have been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 002		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 122002-008, issued November 8, 2002		
Construction Permit 102000-029, issued October 4, 2000		
Emission Point	Description	Control Device
EP-04	Boiler #4: paper pellet/animal waste-fired, 26 MMBtu/hr; installed 1966, modified 1993	CD-02 (Two-Stage Ash Collector Cyclone)
EP-05	Boiler #5: wood chip/animal waste-fired, 36 MMBtu/hr; installed 1981	CD-01 (High Efficiency Wet Scrubber)
EP-14	Hammermill: 1.5 ton/hr	Cyclone

Operational Limitations:

- 1) The control devices associated with the emission points of this permit condition shall be use at all times the emission points are in operation. [122002-008 S.C. 2A, 3A & 102000-029 S.C. 1A]
- 2) The permittee shall operate and maintain the control devices and any related instrumentation or equipment in accordance with the manufacturer’s specifications. [122002-008 S.C. 2A, 3A & 102000-029 S.C. 1A]
- 3) The permittee shall inspect the control devices at least once every six (6) months and at a minimum conduct the following activities: [122002-0008 S.C. 2B, 3B & 102000-029 S.C. 1B]
 - a) Check the cleaning sequence of the control devices for proper operation;
 - b) Inspect all components of the control system that are not subject to wear or plugging, including structural components, housing, ducts, hoods, etc.; and
 - c) If leaks or abnormal conditions are found during these inspections, the appropriate remedial actions shall be implemented before restarting the equipment.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an operating, maintenance and inspection log for the control devices (using Attachment E or an equivalent form) which shall include the following: [122002-008 S.C. 2C, 3C & 102000-029 S.C. 1C]
 - a) Incident of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on emissions due to the malfunction;
 - b) Any maintenance activities conducted on the units, such as replacement of equipment, etc.; and
 - c) A written record of regular inspection schedules, the date and the results of all inspections including any actions or maintenance activities that result from that inspection.
- 2) The permittee shall keep a copy of the manufacturer’s specifications for the control devices on-site.
- 3) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources’ personnel upon request.

Reporting:

- 1) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 003		
10 CSR 10-6.060 Construction Permits Required Construction Permit 0792-038, issued July 28, 1992 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units		
Emission Point	Description	Control Device
EP-04	Boiler #4: paper pellet/animal waste-fired, 26 MMBtu/hr; installed 1966, modified 1993	CD-02 (Two-Stage Ash Collector Cyclone)

Operational Limitation:

- 1) The permittee shall not combust paper pellets in EP-04 Boiler #4 in excess of 7,999 tons per consecutive 12-month period. [Special Condition 1]

Monitoring/Recordkeeping:

- 1) The permittee shall maintain records of the amount of paper pellets combusted in Boiler #4 daily and calculate monthly the total amount of paper pellets burned during each consecutive 12-month period using Attachment C. [Special Condition 2, §60.48c(g)(1)]
- 2) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the operational limitation has been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 004	
10 CSR 10-6.060 Construction Permits Required Construction Permit 042014-004, issued April 17, 2014 10 CSR 10-6.065(6)(C) Operating Permits (Voluntary Limitations)	
Emission Point	Description
EP-01	Boiler #1: fuel oil/natural gas-fired; 26 MMBtu/hr; installed 1958
EP-02	Boiler #2: modified 2014; 30 MMBtu/hr; combusts natural gas and ultra-low sulfur fuel oil No. 2
EP-03	Boiler #3: fuel oil/natural gas-fired, 26 MMBtu/hr; installed 1966

Operational Limitations:

- 1) The permittee shall combust exclusively either fuel oil no. 2 containing less than 15 parts per million by weight sulfur or natural gas in Boiler #2 (EP-02). [Special Condition 1A, Voluntary]
- 2) Fuel oil no. 2 shall only be combusted 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 per boiler during any calendar year. [Special Condition 1B, Voluntary]

Monitoring/Recordkeeping:

- 1) Fuel supplier certifications per each shipment of fuel oil shall be used to demonstrate compliance with Special Condition 1A. [Special Condition 1C, Voluntary]
- 2) The permittee shall keep monthly records showing fuel oil usage amount (gallons), fuel oil operating hours, and reason for fuel oil usage to demonstrate compliance using Attachment G or an equivalent. [Special Condition 1D, Voluntary]
- 3) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the operational limitations have been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 005	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart CCCCCC – National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	
Emission Point	Description
EP-10	Gasoline Storage Tank (991 gal)

Applicability:

- 1) The permittee with a GDF with a monthly throughput of less than 10,000 gallons of gasoline must comply with the requirements in §63.11116. [§63.11111(b)]
- 2) The permittee shall, upon request by the Administrator, demonstrate the monthly throughput is less than 10,000 gallons. [§63.11111(e)]
- 3) If the throughput of the GDF ever exceeds an applicable throughput threshold, the permittee shall remain subject to the requirements for sources above the threshold, even if the throughput later falls below the applicable throughput threshold. [§63.11111(i)]

Management Practices:

- 1) The permittee must, at all times, operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.11115(a)]
- 2) The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)]
 - a) Minimize gasoline spills; [§63.11116(a)(1)]
 - b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(3)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11116(a)(4)]

- 3) The permittee is not required to submit notifications or reports, but the permittee shall have records available within 24 hours of a request by the Administrator to document the installation's gasoline throughput. [§63.11116(b)]
- 4) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel.

General Provisions:

- 1) The permittee shall comply with the applicable General Provisions in Table 3 to MACT CCCCCC. [§63.11130]

Recordkeeping:

The permittee shall keep records as specified in §63.11125(d)(1) and (2). [§63.11125(d)]

- 1) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.11125(d)(1)]
- 2) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.11125(d)(2)]
- 3) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall submit applicable reports as specified in §63.11225 to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

PERMIT CONDITION 006		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart JJJJJ – National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources		
Emission Point	Description	Control Device
EP-04	Boiler #4: paper pellet/animal waste-fired, 26 MMBtu/hr; installed 1966, modified 1993	CD-02 (Two-Stage Ash Collector Cyclone)
EP-05	Boiler #5: wood chip/animal waste-fired, 36 MMBtu/hr; installed 1981	CD-01 (High Efficiency Wet Scrubber)

Standards:

- 1) The permittee shall comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to 40 CFR Part 63, Subpart JJJJJ that applies. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to 40 CFR Part 63, Subpart JJJJJ satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. [§63.11201(b)]

- 2) These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time the permittee comply only with Table 2 to 40 CFR Part 63, Subpart JJJJJ. [§63.11201(d)]
- 3) The permittee shall conduct a tune-up of the boilers biennially as specified in §63.11223. [Table 2 of MACT JJJJJ]
- 4) The permittee shall have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment shall include the following with extent of the evaluation for items a) to d) appropriate for the on-site technical hours listed in §63.11237: [Table 2 to MACT JJJJJ]
 - 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 permittee,
 - d) A review of available architectural and engineering plans, facility operation.
 - 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.

General Compliance Requirements:

At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11205(a)]

Continuous Compliance Requirements:

- 1) The permittee shall conduct a performance tune-up according to §63.11223(b) and keep records as required in §63.11225(c) to demonstrate continuous compliance. The permittee shall conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223(a)]
- 2) Except as specified in §63.11223(c) through (f), the permittee shall conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in §63.11223(b)(1) through (7). Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [§63.11223(b)]

- a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(1)]
- b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
- c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [§63.11223(b)(3)]
- d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [§63.11223(b)(4)]
- e) Measure the concentrations in the effluent stream of CO in ppmv and O₂ in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [§63.11223(b)(5)]
- f) Maintain on-site and submit, if requested by the Administrator, a report containing the following information: [§63.11223(b)(6)]
 - i) The concentrations of CO in the effluent stream in ppmv and O₂ in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
 - ii) A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]
 - iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [§63.11223(b)(6)(iii)]
- g) If the unit is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 days of startup. [§63.11223(b)(7)]

General Provisions:

- 1) The permittee shall comply with Table 8 to 40 CFR Part 63, Subpart JJJJJ for 40 CFR Part 63, Subpart A, as applicable.

Notification, Recordkeeping, and Reporting:

- 1) The permittee shall prepare, by March 1 of each year, and submit to EPA upon request, an annual compliance certification report for the previous calendar year containing the information specified in §63.11225(b)(1) through (4). The permittee shall submit the report by March 15 if any instance described by §63.11225(b)(3) occurred. For boilers that are subject only to a requirement to conduct a biennial tune-up according to §63.11223(a) and not subject to emission limits or operating limits, the permittee may prepare only a biennial compliance report as specified in §63.11225(b)(1) and (2). [§63.11225(b)]
 - a) Company name and address. [§63.11225(b)(1)]
 - 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 40

- CFR Part 63, Subpart JJJJJ. The notification shall include the following certification(s) of compliance, as applicable, and signed by a responsible official: [§63.11225(b)(2)]
- i) “This facility complies with the requirements in §63.11223 to conduct a biennial tune-up, as applicable, of each boiler.” [§63.11225(b)(2)(i)]
 - ii) For units that do not qualify for a statutory exemption as provided in §129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” [§63.11225(b)(2)(ii)]
 - 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. [§63.11225(b)(3)]
- 2) The permittee shall maintain the following records: [§63.11225(c)]
- a) As required in §63.10(b)(2)(xiv), the permittee shall keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. [§63.11225(c)(1)]
 - b) The permittee shall keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as follows: [§63.11225(c)(2)]
 - i) Records shall 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. [§63.11225(c)(2)(i)]
 - ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1), the permittee shall keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), the permittee shall keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1). If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c), the permittee shall keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, the permittee shall keep records documenting that the material is a listed non-waste under §241.4(a). [§63.11225(c)(2)(ii)]
 - iii) For each boiler required to conduct an energy assessment, the permittee shall keep a copy of the energy assessment report. [§63.11225(c)(2)(iii)]
 - c) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [§63.11225(c)(4)]
 - d) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [§63.11225(c)(5)]
- 3) Records shall be in a form suitable and readily available for expeditious review. The permittee shall keep each record for five years following the date of each recorded action. The permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least two years after the date of each recorded action. The permittee may keep the records off site for the remaining three years. [§63.11225(d)]

- 4) If the permittee intends to commence or recommence combustion of solid waste, the permittee shall provide 30 days prior notice of the date upon which the permittee will commence or recommence combustion of solid waste. The notification shall identify: [§63.11225(f)]
 - a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice. [§63.11225(f)(1)]
 - b) The currently applicable subcategory under 40 CFR Part 63, Subpart JJJJJJ. [§63.11225(f)(2)]
 - c) The date on which the permittee became subject to the currently applicable emission limits. [§63.11225(f)(3)]
 - d) The date upon which the permittee will commence combusting solid waste. [§63.11225(f)(4)]
- 5) If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJJ or in the boiler switching out of 40 CFR Part 63, Subpart JJJJJJ due to a change to 100 percent natural gas, the permittee shall provide notice of the date upon which the permittee switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification shall identify: [§63.11225(g)]
 - a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice. [§63.11225(g)(1)]
 - b) The date upon which the fuel switch, physical change, or permit limit occurred. [§63.11225(g)(2)]
- 6) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall submit applicable reports as specified in §63.11225 to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

PERMIT CONDITION 007A		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Emission Point	Description	Control Device
EP-01	Boiler #1: fuel oil/natural gas-fired; 26 MMBtu/hr; installed 1958	-
EP-02	Boiler #2: natural gas/fuel oil-fired; 30 MMBtu/hr; installed 1962, modified 2014	-
EP-03	Boiler #3: fuel oil/natural gas-fired, 26 MMBtu/hr; installed 1966	-
EP-05	Boiler #5: wood chip/animal waste-fired, 36 MMBtu/hr; installed 1981	CD-01 (High Efficiency Wet Scrubber)
EP-08	Waste Paper Grinder: 3 ton/hr	-
EP-09	Pelletizer: 3 ton/hr	-

Emission Limitations:

- 1) The permittee shall follow the emission limitations for the associated emission point:

Emission Point	Limitation
EP-01	The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 40 percent for any continuous six-minute period.
EP-03	
EP-02	
EP-05	The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period.
EP-08	
EP-09	

- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent for any continuous six-minute period.
- 3) Failure to demonstrate compliance with the opacity limitations solely because of the presences of uncombined water shall not be a violation.

Monitoring:

- 1) Monitoring schedule:
- a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
 - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
 - (1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
- 2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
- 3) Observations are only required when the emission units are operating and when the weather conditions allow.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.

- 5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
- 6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results for each emission unit using Attachments D1 and D2 or equivalent forms.
- 2) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the emission limitations have been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 007B	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Point	Description
EP-18B	Crucible Furnaces – Process: 0.10035 ton/hr
EP-20B	Wood-fired Clay Kiln: 0.3 MMBtu/hr
EP-20C	Clay Kilns – Process: 0.10035 ton/hr

Emission Limitations:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period.
- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent for any continuous six-minute period.
- 3) Failure to demonstrate compliance with the opacity limitations solely because of the presences of uncombined water shall not be a violation.

Monitoring/Recordkeeping:

Not required. See Statement of Basis.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no

later than ten (10) days after the end of the month during which any records indicate that the emission limitations have been exceeded.

- 2) The permittee shall report any deviations from the reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 008A	
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions	
Emission Point	Description
EP-15	Diesel Emergency Generator: 1.877 MMBtu/hr, installed 1976

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement²

Operational Limitation:

- 1) The permittee shall use fuel oil with a sulfur content of less than 35,249 ppm_w for distillate fuel oil.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain fuel purchase receipts indicating the sulfur content of the fuel used.
- 2) The permittee shall keep all records for at least five (5) years, and shall make all records immediately available to any of The Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the operational limitation has been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 008B		
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds ³		
Emission Point	Description	Status ⁴
EP-15	Diesel Emergency Generator: 1.877 MMBtu/hr, installed 1976	Existing
EP-18B	Crucible Furnaces – Process: 0.10035 ton/hr	New
EP-19	Casting (Aluminum or Bronze): 0.005 ton/hr	New

Emission Limitation:

² This regulation has not yet been adopted into Missouri's SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action on the part of the permittee is needed to revise the operating permit.

³ This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 10-6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, Permit Condition 009B shall no longer be enforceable.

⁴ 'Existing' means as defined in 10 CSR 10-6.020.

- 1) The permittee shall not cause or permit the emission into the atmosphere of gases containing more than 500 ppm_v of SO₂ or more than 35 mg/m³ of H₂SO₄ or SO₃ or any combination of these gases averaged on any consecutive three-hour time period for new emission sources.
- 2) The permittee shall not cause or permit the emission into the atmosphere of gases containing more than 2,000 ppm_v of SO₂ or more than 70 mg/m³ of H₂SO₄ or SO₃ or any combination of these gases averaged on any consecutive three-hour time period for existing emission sources.

Monitoring/Recordkeeping:

Not required. See Statement of Basis.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records indicate that the emission limitation has been exceeded.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 008C		
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds ³		
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions		
Emission Point	Description	Control Device
EP-01	Boiler #1: fuel oil/natural gas-fired; 26 MMBtu/hr; installed 1958	-
EP-02	Boiler #2: natural gas/fuel oil-fired; 30 MMBtu/hr; installed 1962, modified 2014	-
EP-03	Boiler #3: fuel oil/natural gas-fired, 26 MMBtu/hr; installed 1966	-
EP-04	Boiler #4: paper pellet/animal waste-fired, 26 MMBtu/hr; installed 1966, modified 1993	CD-02 (Two-Stage Ash Collector Cyclone)
EP-05	Boiler #5: wood chip/animal waste-fired, 36 MMBtu/hr; installed 1981	CD-01 (High Efficiency Wet Scrubber)

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement²

Emission Limitation:

- 1) The permittee shall not cause or allow emissions of SO₂ into the atmosphere from any indirect heating source in excess of 8 lb/MMBtu actual heat input averaged on any consecutive three-hour time period.

Monitoring/Recordkeeping:

No monitoring or recordkeeping required. See Statement of Basis.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no

later than ten (10) days after the end of the month during which any records indicate that the emission limitation has been exceeded.

- 2) The permittee shall report any deviations from the reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

PERMIT CONDITION 009		
10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating		
Emission Point	Description	Control Device
EP-01	Boiler #1: fuel oil/natural gas-fired; 26 MMBtu/hr; installed 1958	-
EP-02	Boiler #2: natural gas/fuel oil-fired; 30 MMBtu/hr; installed 1962, modified 2014	-
EP-03	Boiler #3: fuel oil/natural gas-fired, 26 MMBtu/hr; installed 1966	-
EP-04	Boiler #4: paper pellet/animal waste-fired, 26 MMBtu/hr; installed 1966, modified 1993	CD-02 (Two-Stage Ash Collector Cyclone)
EP-05	Boiler #5: wood chip/animal waste-fired, 36 MMBtu/hr; installed 1981	CD-01 (High Efficiency Wet Scrubber)
EP-20B	Wood-fired Clay Kiln: 0.3 MMBtu/hr	-

Emission Limitation:

- 1) The permittee shall not emit PM in excess of 0.37 lb/MMBtu from existing emission units: EP-01 Boiler #1 and EP-03 Boiler #3.
- 2) The permittee shall not emit PM in excess of 0.24 lb/MMBtu from new emission units: EP-02 Boiler #2, EP-04 Boiler #4, EP-05 Boiler #5, and EP-20B Wood-fired Clay Kiln.

Monitoring/Recordkeeping:

Monitoring and recordkeeping is not required. See Statement of Basis.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which any records indicate that the emission limitation has been exceeded.
- 2) The permittee shall report any deviations from the reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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

10 CSR 10-6.170

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

Emission Limitation:

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

Monitoring:

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

The permittee shall maintain the following monitoring schedule:

- 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 F, or its equivalent, noting the following:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

This is a State Only permit requirement.

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)
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- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed

refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

V. General Permit Requirements

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

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

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Stacy R. Carrick, Vice President of Finance. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the

source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

Attachment D1

Method 22 Visible Emissions Observations					
Installation Name			Observer Name		
Location			Date		
Sky Conditions			Wind Direction		
Precipitation			Wind Speed		
Time			Emission unit		
<p>Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.</p>					
Minute	Seconds				Comments
	0	15	30	45	
	Visible Emissions Yes (Y) or No (N)				
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment D2

Method 9 Opacity Observations									
Installation Name:						Sketch of the observer's position relative to the emission unit			
Emission Point:									
Emission Unit:									
Observer Name and Affiliation:									
Observer Certification Date:									
Method 9 Observation Date:									
Height of Emission Point:									
Time:						Start of observations	End of observations		
Distance of Observer from Emission Point:									
Observer Direction from Emission Point:									
Approximate Wind Direction:									
Estimated Wind Speed:									
Ambient Temperature:									
Description of Sky Conditions (Presence and color of clouds):									
Plume Color:									
Approximate Distance Plume is Visible from Emission Point:									
Minute	Seconds				1-minute Avg. % Opacity ¹²	6-minute Avg. % Opacity ¹³	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity) ¹⁴								
0					N/A				
1					N/A				
2					N/A				
3					N/A				
4					N/A				
5									
6									
7									
8									
9									
10									
11									
12									

¹² 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
¹³ 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
¹⁴ Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									

The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%.
Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 60%.

Was the emission unit in compliance at the time of evaluation (yes or no)? _____

Signature of Observer

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Northwest Missouri State University is an educational institution for higher learning. The installation operates a power plant consisting of three natural gas boilers, a paper pellet/animal waste boiler, and a wood chip/animal waste boiler. Additional equipment includes wood chip, pellet, and ash storage piles, waste paper grinding, mixing and pelletizing animal waste with paper/wood chips, fuel storage tanks, parts cleaners, small heaters and boilers, crucible furnaces, aluminum and bronze casting, two natural gas-fired kilns, a wood-fired kiln, and ceramic glazing. The installation is a major source of sulfur oxides (SO_x), Nitrogen Oxides (NO_x), and Carbon Monoxide (CO). The installation is not on the List of Named Installations.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)¹⁵
PM ₁₀	61.27
PM _{2.5}	7.75
Sulfur Oxides (SO _x)	744.59
Nitrogen Oxides (NO _x)	198.51
Volatile Organic Compounds (VOCs)	23.70
Carbon Monoxide (CO)	135.98
Hazardous Air Pollutants (HAPs)	11.78
Hydrogen Chloride (7647-01-0)	5.08
Formaldehyde (50-00-0)	1.26
Benzene (71-43-2)	1.12
Acrolein (107-02-8)	1.07
Hexane (110-54-3)	0.92
Styrene (100-42-5)	0.51
Manganese Compounds (20-12-2)	0.43
Lead Compounds (20-11-1)	0.29
Toluene (108-88-3)	0.26
Acetaldehyde (75-07-0)	0.22
Chlorine (7782-50-5)	0.21
Hydrogen Fluoride (7664-39-3)	0.21
Dichloromethane (75-09-2)	0.08
Naphthalene (91-20-3)	0.03
Propionaldehyde (123-38-6)	0.02
Phenol (108-95-2)	0.01
Polycyclic Organic Matter (TP15)	0.01

¹⁵ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. Calculations were obtained from OP2013-051 and Construction Permit 042014-004. Fugitives were included in the PTE.

- Emissions from EP-01 Boiler #1, EP-02 Boiler #2, and EP-03 Boiler #3 are based upon the worst-case fuel for each pollutant.
- Emissions from EP-04 Boiler #4 and EP-05 Boiler #5 were limited to 40 tpy NO_x and 15 tpy PM₁₀ per Permit Condition 001. The emissions from EP-04 Boiler #4 and EP-05 Boiler #5 were calculated using stack testing data from January 2002 – EP-04’s cyclone and EP-05’s wet scrubber were in use during the stack testing and are included in the calculated potential emissions.
- Annual emissions from EP-04 Boiler #4 were limited by the 7,999 tpy paper pellet combustion limit per Permit Condition 003.
- EP-15 Emergency Generator was evaluated at 500 hours of annual operation

Reported Air Pollutant Emissions, tons per year

Pollutants	2017	2016	2015	2014	2013
Particulate Matter ≤ Ten Microns (PM ₁₀)	1.61	1.72	1.87	1.90	1.97
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	1.40	1.51	1.63	1.65	1.71
Sulfur Oxides (SO _x)	0.35	0.30	0.41	0.37	0.43
Nitrogen Oxides (NO _x)	15.57	16.87	18.09	18.33	19.05
Volatile Organic Compounds (VOC)	1.08	1.22	1.25	1.32	1.32
Carbon Monoxide (CO)	37.99	41.74	44.18	46.65	46.43
Lead (Pb)	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Hazardous Air Pollutants (HAPs)	1.25	1.34	1.45	1.53	1.53

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received April 3, 2018;
- 2) 2017 Emissions Inventory Questionnaire, received March 20, 2018;
- 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 042014-004, issued April 17, 2014;
- 6) Construction Permit 122002-008, issued November 8, 2002;
- 7) Temporary Construction Permits 082001-012 and 022001-010;
- 8) Construction Permit 102000-029, issued October 4, 2000;
- 9) Construction Permit 0792-038, issued July 28, 1992;
- 10) Construction Permit 0881-001, issued August 1, 1981;
- 11) Construction Permit 0679-001, issued June 1, 1979.

Construction Permit History

Construction Permit 042014-004, issued April 17, 2014

This de minimis construction permit is for the replacement of two existing dual fuel (natural gas and fuel oil) fired burners on Boiler #2 (EP-02) that have a combined capacity of 26 MMBtu/hr with one new 30 MMBtu/hr natural gas fired burner with No. 2 fuel oil back-up. It contains 2 special conditions.

- Special Condition 1 contains several fuel restriction requirements on EP-02. They have been incorporated into the operating permit.

- Special Condition 2 contains general recordkeeping requirements. They have been incorporated into the operating permit.

Construction Permit 092003-008, issued August 13, 2003

This de minimis construction permit is for the installation of EP-06 Haul Road, EP-16 Pellet Storage Pile, and EP-17 Ash Storage Pile. This permit contains no special conditions.

Construction Permit 122002-008, issued November 8, 2002

This de minimis construction permit is for the combustion of animal waste as an alternative fuel in EP-04 Boiler #4 and EP-05 Boiler #5. It contains 3 special conditions.

- Special Condition 1 contains NO_x and PM₁₀ limitations along with recordkeeping and reporting requirements. They have all been incorporated into the operating permit.
- Special Condition 2 requires use of the two-stage ash collector cyclone on EP-04 Boiler #4 along with monitoring and recordkeeping. It has been added to the operating permit.
- Special Condition 3 requires use of the wet scrubber on EP-05 Boiler #5 along with monitoring and recordkeeping. It has been added to the operating permit.

Temporary Construction Permits 082001-012 and 022001-010

These temporary construction permits have all expired.

Construction Permit 102000-029, issued October 4, 2000

This de minimis construction permit is for the addition of EP-14 Hammermill, EP-14A Mixer, and EP-14B Animal Waste Pelletizer. It contains 1 special condition.

- Special Condition 1 requires the use of the cyclone associated with EP-14 Hammermill along with monitoring and recordkeeping requirements. It has been added to the operating permit.

Construction Permit 0792-038, issued July 28, 1992

This construction permit is for the retrofit of EP-04 Boiler #4 to allow for the combustion of pelletized recycled paper and wood chips and the installation of a paper baler, EP-08 Waste Paper Grinder, EP-09 Pelletizer, bucket elevator, fuel storage vessel, hopper, stoker, ash pit, ash removal augers, two-stage ash collector, and fuel and ash conveyor systems. It contains 4 special conditions.

- Special Condition 1 limits the amount of paper and wood chips burned in EP-04 Boiler #4. It has been added to the operating permit.
- Special Condition 2 contains recordkeeping requirements for the amount of paper and wood chips burned. It has been added to the operating permit.
- Special Condition 3 contains general reporting requirements that have been incorporated in the operating permit.
- Special Condition 4 requires the facility to obtain a new construction permit under 10 CSR 10-6.060 if 0792-038 is violated. 10 CSR 10-6.060 has already been incorporated into Section IV. Core Permit Requirements. In order to streamline this operating permit, Special Condition 4 was not included.

Construction Permit 0881-001, issued August 1, 1981

This construction permit is for the installation of EP-05 Boiler #5. It contains 1 special condition.

- Special Condition 1 required a one-time stack test on the boiler, which has already been conducted. As a result, this condition was not added in the operating permit.

Construction Permit 0679-001, issued June 1, 1979

This construction permit is for the installation of an incinerator. The incinerator is no longer located at the facility; therefore, this construction permit is no longer applicable to the installation.

Missouri Code of State Regulations (CSR) Applicability

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

This rule applies and has been incorporated into the permit. EP-15 Emergency Generator is exempt from this regulation per (1)(A) as an internal combustion engine. EP-04 Boiler #4 and EP-02 Boiler #2 is exempt from this regulation per (1)(H) as they are regulated under 10 CSR 10-6.070. EP-06 Haul Road is exempt per (1)(K) due to being a fugitive emission source. EP-13 Small Heaters/Boilers and EP-20A Two Clay Kilns are exempt per (1)(L) due to being fueled by natural gas only.

The following emissions are exempt due to only emitting within a building space per (1)(O):

Emission Point	Description
EP-14	Hammermill
EP-14A	Mixer
EP-14B	Animal Waste Pelletizer
EP-16	Pellet Storage Pile
EP-21	Ceramic Glazing

The following units are subject to the regulation, but due to potential PM emissions being less than 0.5 lb/hr, no visible PM emissions are expected, so no further monitoring, recordkeeping, or reporting is required at this time:

Emission Point	Description	MHDR	PM Emission Factor	Emission Factor Source	PM PTE (lb/hr)
EP-18	Crucible Furnaces	0.005 ton/hr	1.9 lb/ton	SCC 30400102	0.11
		0.005 ton/hr	21 lb/ton	SCC 30400219	0.01
EP-20B	Wood-fired Clay Kiln	0.3 MMBtu/hr	0.347 lb/ MMBtu	SCC 10200908	0.10
EP-20C	Clay Kilns – Process	0.10035 ton/hr	0.067 lb/ton	SCC 30500856	0.01

The emission points subject to Permit Condition 007A have a potential to emit particulate matter above 0.5 lb/hr and thus require monitoring for visible emissions.

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

This rule is applicable to the installation and has been applied within this permit. EP-13, EP-18A, and EP-20A are exempt from this regulation per (1)(A)2 as they exclusively combust pipeline grade natural gas. EP-20B is exempt from this regulation per (1)(C) as it is an indirect heating source less than 0.35 MMBtu/hr.

The following emission sources are subject to the rule but are always in compliance, and thus do not need any monitoring/recordkeeping due to having a potential to emit SO₂ below the 8 lb/MMBtu limit:

Emission Point	SO ₂ Emission Factor ¹⁶	Emission Factor Source	Potential SO ₂ Emissions (lb/MMBtu)	SO ₂ limit (lb/MMBtu)
EP-01	157S lb/1000gal	AP-42 Table 1.3-1	2.09	8
EP-02	142S lb/1000gal		0.0015	8
EP-03	157S lb/1000gal		2.09	8
EP-04	2.28 lb/ton	January 2002 stack test	0.19	8
EP-05	0.09 lb/ton		0.008	8

EP-15, EP-18B, and EP-19 are subject to the rule but do not have the potential to reach the 500 ppm_v SO₂ limit nor the 35 mg/m³ H₂SO₄ or SO₃ limit. The following are calculations for EP-15 Emergency Engine:

SO₂:

$$\text{Fuel Oil SO}_2 \text{ Emission Factor (lbs/MMBtu)} = \frac{142(3.5249)\text{lb}/10^3\text{gal}}{140 \text{ MMBtu}/10^3\text{gal}} = 3.58 \text{ lb/MMBtu}$$

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

$$\text{ppmv SO}_2 = \left(\frac{3.58 \text{ lb}}{\text{MMBtu}}\right) \times \left(\frac{\text{MMBtu}}{10,320 \text{ wscf}}\right) \times \left(\frac{\text{ppmw}}{1.660E^{-7} \text{ lb/scf}}\right) \times \left(\frac{0.45\text{ppmv}}{\text{ppmw}}\right) = 939 \text{ ppmv}$$

(Appendix A-7 to Part 60)

939 ppm_v is less than the 2,000 ppm_v limit.

SO₃

All SO₃ is assumed to convert to SO₂.

The following calculations demonstrate that EP-18B and EP-19 are in compliance with the rule:

Emission Unit	MHDR (tph)	SO _x Emission Factor (lb/ton)	Potential SO ₂ Concentration (ppm _v)	SO ₂ Concentration Limit (ppm _v)	Potential SO ₃ Concentration (mg/m ³)	SO ₃ Concentration Limit (mg/m ³)
EP-18B	0.005	0.5	0.06	500	0.17	35
EP-19	0.005	0.02	0.003	500	0.007	35

¹⁶ Assumes worst case fuel oil combustion for EP-01, 02, and 03. Assumes a maximum sulfur content of 2% as obtained from the Title V application for residual oil. EP-02 is limited to burning at worst case distillate oil with a sulfur content of 0.0015%. A heating value of 150 MMBtu/1000gal for residual oil and 140 MMBtu/1000gal for distillate oil was obtained from AP-42 Appendix A. Boilers #4 and 5 used the consumption rates from the January 2002 stack test of 2.16 tph and 3.1 tph, respectfully, and dividing them by their respective MHDRs of 26 MMBtu/hr and 35 MMBtu/hr.

The SO_x emission factor for EP-18B was obtained from FIRE for Process SCC 30400219. A conversion factor of 1 ppm_v SO₂ = 2,160 µg/m³ was taken from AP-42 Appendix A. EP-18B was listed as having a stack flowrate of 5,364 acfm at 258°F in the installation's 2017 EIQ.

The SO_x emission factor for EP-19 was obtained from FIRE for Process SCC 30400114. A conversion factor of 1 ppm_v SO₂ = 2,610 µg/m³ was taken from AP-42 Appendix A. EP-19 shares a stack with EP-18B.

As a result, monitoring and recordkeeping is not required.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This rule applies and has been added in this permit. It applies to sulfur-emitting emission sources. However, the rule's limitations are only applicable to fuel-burning emission sources. While nothing explicitly exempts EP-18B Crucible Furnaces – Process and EP-19 Casting, they do not involve fuel burning; because of this no limitations in the rule apply to these emission sources.

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

This rule is not applicable to the installation. The following emission units are exempt from this regulation per (1)(B)6 due to burning fuel for indirect heating:

Emission Point	Description
EP-01	Boiler #1
EP-02	Boiler #2
EP-03	Boiler #3
EP-04	Boiler #4
EP-05	Boiler #5
EP-13	Natural Gas Combustion – Small Heaters/Boilers
EP-18A	Crucible Furnaces – Natural Gas-fired Clay Kilns
EP-20A	Two Natural Gas-fired Clay Kilns
EP-20B	Wood-fired Clay Kiln

The following emission units are exempt from this regulation per (1)(B)12 due to having potential PM emissions of less than 0.5 lb/hr:

Emission Point	Description	MHDR (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor Source	Potential PM Emissions (lb/hr)
EP-14	Hammermill	1.5	0.034	Project No. 2000-08-002	0.05
EP-14A	Mixer	1.5	0.017		0.03
EP-16	Pellet Storage Pile	3.0	0.083	Eng. Calc.	0.25
EP-18B	Crucible Furnaces – Process	0.005	1.9	SCC 30400102	0.11
		0.005	21	SCC 30400219	0.01
EP-20B	Wood-fired Clay Kiln	0.3 MMBtu/hr	0.347 lb/ MMBtu	SCC 10200908	0.10
EP-20C	Clay Kilns – Process	0.10035	0.067	SCC 30500856	0.01
EP-21	Ceramic Glazing	0.02	19	SCC 30500845	0.38

The following emission sources are exempt per (1)(B)16 for having the potential to emit below the process weight limitation:

Emission Point	Description	MHDR (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor Source	Potential PM Emission (lb/hr)	Process Weight Limit (lb/hr)
EP-08	Waste Paper Grinder	3	0.35	SCC 30700802	1.05	8.56
EP-09	Pelletizer	3	0.35	SCC 30700802	1.05	8.56
EP-14B	Animal Waste Pelletizer	3	0.61	Project No. 2000-08-002	1.83	8.56

The following emission sources are exempt per (1)(B)7 due to being fugitive emission sources:

Emission Point	Description
EP-06	Wood Chip and Waste Paper Hauling (Haul Road)
EP-07	Wood Chip Storage Pile
EP-17	Ash Storage Pile

EP-15 Emergency Generator combusts diesel which does not meet the definition of process weight in 10 CSR 10-6.020. The definition of process weight in 10 CSR 10-6.020 excludes 'liquids and gases used solely as fuels and air introduced for purposes of combustion.'

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*

This rule applies and has been incorporated into the operating permit. EP-13, EP-18A, and EP-20A have been deemed in compliance with this regulation per (1)(C) as they are fueled by natural gas. The following demonstrates that EP-01, EP-02, and EP-03 are in compliance with the rule:

Emission Unit	MHDR (MMBtu/hr)
EP-01	26
EP-02	30
EP-03	26
EP-04	26
EP-05	36
EP-13	11.21
EP-18A	0.435
EP-20A	0.55
EP-20B	0.3
Total Q	156.495

Allowable PM emission limitation for existing indirect heating sources at an installation having a total capacity greater than 10 MMBtu/hr and less than 10,000 MMBtu/hr is calculated by the following equation:

$$E = 0.90Q^{-0.174}$$

$$E = 0.90(152.495)^{-0.174} = 0.37 \text{ lb/MMBtu}$$

Emission Point	Fuel ¹⁷	Emission Factor	Emission Factor Source	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)
EP-01	Fuel Oil #5	11.5 lb/1000 gal	SCC 10300402	0.08	0.37
EP-03					

The table demonstrates that the existing boilers meet the emission limitation and thus do not require monitoring/recordkeeping.

Allowable PM emission limitation for new indirect heating sources at an installation having a total capacity greater than 10 MMBtu/hr and less than 2,000 MMBtu/hr is calculated by the following equation:

$$E = 1.31Q^{-0.338}$$

$$E = 1.31(152.495)^{-0.338} = 0.24 \text{ lb/MMBtu}$$

Emission Point	Fuel	Emission Factor	Emission Factor Source	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)
EP-02	Fuel Oil #5 ¹⁷	11.5 lb/1000 gal	SCC 10300402	0.08	0.24
EP-04	Paper Pellets / Animal Waste	2.74 lb/ton ¹⁸	January 2002 stack testing	0.23	
EP-05	Wood Chips / Animal Waste	1.79 lb/ton ¹⁸		0.16	
EP-20B	Wood	0.49 lb/ton	SCC 30500850	0.05	

The table demonstrates that the new indirect heating sources meet the emission limitation and thus do not require monitoring/recordkeeping.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts D, Da, and Db – *Standards of Performance for Steam Generating Units*
 These subparts do not apply. These regulations apply to boilers that are ≥ 100 MMBtu/hr. The boilers at this installation are below that rating.

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart applies and has been incorporated into the operating permit. EP-04 Boiler #4 was modified in 1991 to combust paper pellets/wood chips, thus becoming subject to this subpart. Subpart Dc’s monitoring/recordkeeping in §60.48c(g) is identical to the requirements of Construction Permit 0792-038 and thus this subpart was incorporated with 0792-038’s special conditions. 0792-038’s special conditions do not have allowances for §60.48c(g)’s alternative recordkeeping requirements; as a result, these alternative recordkeeping options were not included.

EP-02 Boiler #2 was modified in 2014, thus also pulling it into applicability. Boilers #1, 3, and 5 are not subject to this regulation as they were constructed prior to June 9, 1989.

¹⁷ Calculations use Fuel Oil #5 due to it resulting in the highest PM emissions out of the fuel types used in the boilers.

¹⁸ Controlled emission factor.

EP-02 Boiler #2 is subject to the fuel limitation of less than 0.5 weight percent sulfur in this subpart; however; Construction Permit 042014-004 contains a more stringent sulfur limitation of 15 ppm. In order to streamline this operating permit, Subpart Dc was not applied to EP-02 Boiler #2. If at any time the fuel limitation in Construction Permit 042014-004 is superseded by a less stringent limitation, the permittee shall comply with the fuel limitation of Subpart Dc for EP-02.

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This subpart does not apply. All the tanks at the installation are below the 75 m³ (19,812 gallon) threshold capacity of this regulation.

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This subpart does not apply. EP-15 Emergency Generator is a 1976 model year engine, which is prior to the earliest model years subject to this regulation.

40 CFR Part 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Combustion Engines*

This subpart does not apply. This subpart applies to spark-ignition engines. The emergency generator is a combustion-ignition engine.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart does not apply. EP-15 Emergency Generator is an existing institutional emergency stationary RICE located at an area source of HAP emissions and thus does not have to meet the requirements of this regulation per §63.6585(f)(3).

40 CFR Part 63, Subpart CCCCCC – *National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

This subpart applies to the installation because they store gasoline in their tanks. This subpart has been incorporated into this operating permit.

40 CFR Part 63, Subpart JJJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources*

This subpart is applicable to boilers EP-04 and EP-05, and has been incorporated into the operating permit. The applicable boilers have completed the energy assessment for compliance with this subpart. EP-01, EP-02, and EP-03 are not subject to this subpart because it meets the definition of a gas-fired boiler per subpart JJJJJJ due to the fuel oil limitation included in Permit Condition 004.

40 CFR Part 63, Subpart RRRRRR – *National Emission Standards for Hazardous Air Pollutants for Clay Ceramics Manufacturing Area Sources*

This subpart does not apply. The installation is not subject to this regulation as the definition of clay ceramics facility within §63.11444 states: 'For the purposes of this area source rule, the following types of facilities are not part of the regulated category: artisan potters, art studios, school and

university ceramic art programs, and any facility that uses less than 50 ton/yr of wet clay.' The installation meets this exemption.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

40 CFR Part 64 is not applicable. While control devices are used on some of the emission points of this installation to control particulate matter, none of them have pre-control emissions that exceed or are equivalent to the major source threshold for particulate matter.

Greenhouse Gas Emissions

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

Other Regulatory Determinations

None.

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 ACP'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 ACP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft was put up on public notice on June 29, 2018 for a period of 30 days. During this time public comments were received from Mark Smith of EPA Region 7. The comments are addressed in the order in which they appear within the letter.

Comment #1:

Permit Condition 003 incorporates special conditions from Permit to Construct 0792-038, issued July 28, 1992, that apply to Emission Point EP-04, Boiler #4. Permit Condition 004 incorporates applicable requirements from 40 CFR Part 60, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam generating Units, that also apply to Emission Point EP-04, Boiler #4. Both Permit Condition 003 and Permit Condition 004 require the permittee record and maintain records of fuel combusted daily, and therefore, it appears MoDNR may have an opportunity to streamline this Part 70 operating permit by combining Permit Condition 003 and Permit Condition 004 into one single permit condition. EPA suggests MoDNR investigate additional opportunities to streamline permit conditions.

Response #1:

MoDNR agrees that this appears to be a good opportunity to streamline this operating permit. Permit Condition 004 has been incorporated into Permit Condition 003. The other permit conditions have been renumbered as a result. Subpart Dc has been updated under the Statement of Basis.

Comment #2:

Permit Condition 005 incorporates special conditions from Permit to Construct 042014-004, issued April 17, 2014, authorizing the replacement of two existing dual fuel burners on Boiler #2, with a combined capacity of 26 MMBtu per hour, with one new 30 MMBtu per hour natural gas-fired burner with #2 fuel oil back-up. Permit Condition 005 references Emission Point EP-01 (Boiler #1), Emission Point EP-02 (Boiler #2) and Emission Point EP-03 (Boiler #3), however, Permit to Construct 042014-004 only authorized the modification to Boiler #2. All special conditions apply only to Boiler #2, therefore, EPA recommends MoDNR consider whether or not the reference to Boiler #1 and Boiler #3 are appropriate.

Response #2:

While Construction Permit 042014-004's special conditions only apply to EP-02 Boiler #2, the permittee also wished to accept identical voluntary limitations on EP-01 Boiler #1 and EP-03 Boiler #3 in order to meet the definition of *gas-fired boiler* in 40 CFR Part 63, Subpart JJJJJ. In order to streamline this operating permit, the requirements were combined into Permit Condition 004 (formerly Permit Condition 005). The voluntary limitations are denoted in the permit condition by the word "Voluntary" in between the square brackets, which is meant to differentiate between the accepted voluntary limitations and the construction permit limitations (which are differently denoted by "Special Condition..." in the square brackets).

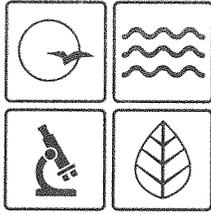
Comment #3:

Permit Condition 006 incorporates requirements from 40 CFR Part 63, Subpart CCCCC-National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities and Permit Condition 007 incorporates applicable requirements from 40 CFR Part 63, Subpart JJJJJ-

National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. Permit Condition 006 and Permit Condition 007 are both Maximum Achievable Control Technology (MACT) standards for area source of hazardous air pollutants (HAPs). 10 CSR 10-6.075 indicates that MoDNR relies on the EPA for the enforcement of area source MACT standards, therefore, it may be more appropriate to have the permittee submit deviation reports to the Missouri Air Compliance Coordinator at EPA, Region 7.

Response #3:

The reporting requirements for Permit Conditions 005 (formerly 006) and 006 (formerly 007) have been corrected.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

AUG 06 2018

Mr. Stacy R. Carrick
Northwest Missouri State University
West 9th Street
Maryville, MO 64468

Re: Northwest Missouri State University, 147-0005
Permit Number: OP2018-070

Dear Mr. Carrick:

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

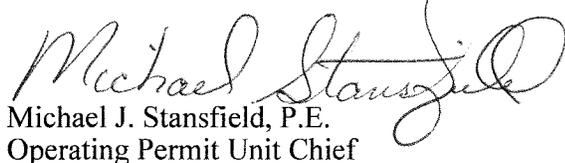
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:kwj

Enclosures

c: PAMS File: 2018-04-007



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