



Matt Blunt, Governor • Doyle Childers, Director

## DEPARTMENT OF NATURAL RESOURCES

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MAY 15 2007

Mr. James Jay Stoupe  
Director of Manufacturing  
Omnium, LLC  
1417 Lower Lake Road  
St. Joseph, MO 64504

Re: Omnium, LLC, 021-0045  
Permit Number: **OP2007-017**

Dear Mr. Stoupe:

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

If you have any questions or need additional information regarding this permit, please contact Andrea Collier at (816) 622-7600 or me at (573) 751-4817 or write the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in cursive script that reads "Michael J. Stansfield".

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

MJS: ack

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII  
Kansas City Regional Office  
PAMS File: 2006-04-022



## INTERMEDIATE STATE PERMIT TO OPERATE

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

**Intermediate Operating Permit Number:** OP2007-017  
**Expiration Date:** MAY 14 2012  
**Installation ID:** 021-0045  
**Project Number:** 2006-04-022

**Installation Name and Address**

Omnium, LLC  
1417 Lower Lake Road, P.O. Box 788  
St. Joseph, MO 64504  
Buchanan County

**Parent Company's Name and Address**

Agriliance, LLC  
PO Box 64089, MS 335  
St. Paul, MN 55164-0089

**Installation Description:**

Omnium, LLC is a herbicide and pesticide manufacturing facility. Process areas at the plant that are sources of emissions include: granular insecticide formulation and packaging (P1), liquid formulation and packaging (P2), herbicide synthesis (P4), liquid flowable formulation and shipping (P5), liquid flowable formulation (P6), wastewater treatment (P7), administration building boiler (P8), liquid flowable packaging (P9), neutralization process (P12), and liquid insecticide formulation and packaging (P13).

MAY 15 2007

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Omnium, LLC is a herbicide and pesticide manufacturing facility. Process areas at the plant that are sources of emissions include: granular insecticide formulation and packaging (P1), liquid formulation and packaging (P2), herbicide synthesis (P4), liquid flowable formulation and shipping (P5), liquid flowable formulation (P6), wastewater treatment (P7), administration building boiler (P8), liquid flowable packaging (P9), neutralization process (P12), and liquid insecticide formulation and packaging (P13).

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants <sup>1</sup> (HAPs)
2005	6.29	--	1.27	15.49	--	--	--
2004	5.12	--	1.69	12.84	--	--	--
2003	5.00	--	2.00	18.00	--	--	--
2002	2.41	--	--	--	--	--	--
2001	1.49	--	--	--	--	--	--

<sup>1</sup> HAPs reported as VOCs

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
<b>Process P1 – Granular Insecticide Formulation and Packaging (CC81)</b>	
EU0010	Rotex Undersize Screen
EU0020	Carrier Weigh Hopper
EU0030	Munson Mixer
EU0040	Rotex Oversize Screen
EU0050	Sesco 20 ft. Elevator
EU0060	Sesco 27 ft. Elevator
EU0070	Bagging Hopper #1
EU0080	Bagging Hopper #2
EU0090	Bag Filter #1
EU0100	Bag Filter #2
EU0110	Reject Elevator
EU0120	DMHP Storage Tank
EU0130	Chloral Storage Tank
EU0140	Trichlorfon Reactor
<b>Process P2 – Liquid Formulation and Packaging</b>	
EU0150	Trifluralin Drum Auger
<b>Process P4 – Herbicide Synthesis (CC10)</b>	
EU0160	Herbicide Technical Powder Charge
EU0170	Dispersion Tank

- EU0180 Product Dryer
- EU0190 Hammermill
- EU0200 Product Blender
- EU0210 Conveyor System to Product Dryer
- EU0220 Product Tote Filling Station/Auger
- Process P5 – Liquid Flowable Formulation and Shipping (CC50)**
- EU0230 Formulation Tank
- EU0240 Formulation Tank
- EU0250 Pregel (Raw Material) Tank
- Process P6 – Liquid Flowable Formulation (CC15)**
- EU0260 Technical Dump Station
- EU0270 Formulation Tank
- Process P12 – Dicamba Neutralization Process (CC03)**
- EU0280 Finished Product Conveyor Bagging
- EU0290 Dicamba Collection Hopper
- EU0300 Drum Auger
- EU0310 Tote Fill Conveyor
- EU0320 Littleford Blender
- EU0330 Technical Charge Tote Bag Filling

**EMISSION UNITS WITHOUT LIMITATIONS**

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

Equipment ID	EIQ Reference (2005)	Description of Emission Source
<b>Process P1 – Granular Insecticide Formulation and Packaging (CC81)</b>		
	1E1, 1E3	Truck Unloading to Clay/Cob Silos
TV203-TV205	1E7	3 Clay Storage Silos
TV206	1E6	Corn Cob Storage Silo
BH201		Underground Clay Bulk Unloading Belt Conveyor
BH245		Underground Cob Bulk Unloading Belt Conveyor
BH202		96' Bucket Elevator
BH246		70' Bucket Elevator
BH206-BH208	1E8	3 Belt Conveyors from Clay Storage Silos
BH209	1E9	Auger Conveyor from Cob Storage Silo
BH209		60' Belt Conveyor feed to 60' Bucket Elevator
BH210		60' Bucket Elevator
TV223	1E2	Trichlorfon Storage/Spray Tank (2,000 gal)
TV261		Premix Tech Storage Tank (10,000 gal)
TV201		Technical Day Tank (3,000 gal)
TV217		Technical Spray Weigh Tank (800 gal)
<b>Process P2 – Liquid Formulation and Packaging</b>		
TV424		Raw Material Storage Tank (12,000 gal)
TV425		Raw Material Storage Tank (12,000 gal)
TV426		Aromatic 100/200 Storage Tank (12,000 gal)
TV427		Aromatic 100/200 Storage Tank (12,000 gal)
TV430		Raw Material Storage Tank (12,000 gal)

TV431		Raw Material Storage Tank (12,000 gal)
TV434	2E4	Trifluralin Blend Tank (4,000 gal)
TV403		Trifluralin Product Storage Tank (10,000 gal)
TV408	2E3	Blend Tank (4,000 gal)
TV409	2E7	Blend Tank (4,000 gal)
TV410		Packaging Head Tank (4,000 gal)
TV405		Raw Material/Pre-Blend Product Storage Tank (10,000 gal)
	2E2	Open Top Packaging Feed Tank
	2E6	Filling Machine

**Process P4 – Herbicide Synthesis (CC10)**

TV722		25% Caustic Feed Tank (7,500 gal)
TV731		Reactor Feed Tank/Technical Slurry (8,400 gal)
TV711,TV712		MeSH Raw Material Storage Tank (13,111 gal)
TV743		MeSH Batch Tank (650 gal)
TV740-TV742	4E3	3 Herbicide Synthesis Reactors (6,000 gal)
TV760, TV761		2 Centrifuge Feed Tanks (8,400 gal)
SF762, SF763, SF764, SF765		4 Centrifuges
BH785	4E14	Bucket Elevator to Product Storage/Blender

**Process P5 – Liquid Flowable Formulation and Shipping (CC50)**

TV115	5E1	9.5 Nonyl Phenol Storage Tank (5,700 gal)
ML117, ML118	5E4	2 Open Head Bead Mills (60 gal)
ML183, ML184	5E4	2 Open Head Bead Mills (60 gal)
TV152, TV153	5E5	2 Intermediate Process Tanks (4,862 gal)
TV116	5E6	Raw Material Storage Tank (5,700 gal)

**Process P6 – Liquid Flowable Formulation (CC15)**

TV501		Mill Feed Tank (4,000 gal)
TV505, TV506		2 Intermediate Trim Tanks (4,000gal)
TV502		Raw Material Storage Tank (309 gal)
TV503		Raw Material Storage Tank (3,500 gal)
	6E3	Open-head Sandmills

**Process P8 – Administration Building Boiler (natural gas)**

	8E1	Space Heater (0.91 MMBtu/hr)
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**Process P9 – Liquid Flowable Packaging (CC70)**

TV162	9E1	Filling Line Storage/Feed Tank (11,965 gal)
TV163	9E3	Filling Line Storage/Feed Tank (11,965 gal)
TV164	9E4	Filling Line Storage/Feed Tank (11,965 gal)
	9E2	Filling Line Thiele Fillers

**Process P13 – Liquid Insecticide Formulation and Packaging**

TV600	13E3	Raw Material Storage Tank (7,220 gal)
TV601	13E4	Raw Material Storage Tank (9,500 gal)
TV602		Raw Material Storage Tank (9,500 gal)
TV603	13E2	Drum Rinse Tank (55gal)
TV604	13E2	Pack Line Tank (7,150 gal)
TV605	13E2	Formulation Tank (7,150 gal)
	13E2	Filler Head Tank (120 gal)
	13E2	Drum Fill Station
TV157		Pre-blend Product Tank (4,400 gal)

TV158

13E1

13E5

Pre-blend Product Tank (4,400 gal)

Fill Machine

Truck Unloading Area

**DOCUMENTS INCORPORATED BY REFERENCE**

The following document has been incorporated by reference into this permit:

Construction Permit #0498-001

## 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.

### Permit Condition PW001

10 CSR 10-6.065(2)(C)  
**Operating Permits**  
Voluntary Limitations

#### Emission Limitations:

- 1) The installation shall emit less than 100 tons of volatile organic compounds (VOC) in any consecutive 12-month period.
- 2) The installation shall emit less than 100 tons of particulate matter (PM<sub>10</sub>) in any consecutive 12-month period.
- 3) The installation shall emit less than 10 tons of any individual Hazardous Air Pollutant (HAP) in any consecutive 12-month period.
- 4) The installation shall emit less than 25 tons of combined HAPs in any consecutive 12-month period.

#### Monitoring/Recordkeeping:

- 1) The permittee shall calculate and record facility-wide emissions of VOCs, PM<sub>10</sub>, and HAPs on a rolling 12-month basis.
- 2) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

#### Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which causes an exceedance of this regulation. Any deviations from this permit condition shall be reported in the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

### 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.

**Process P1 – Granular Insecticide Formulation and Packaging (CC81)**

**EU0010 – EU0090**  
 Location: Building 18  
 EIQ Reference (2005): 1E2

Emission Unit	Equipment ID	Unit Description	Capacity
EU0010	VS211	Rotex Undersize Screen	4.5 tons/hr
EU0020	TV220	Carrier Weigh Hopper	
EU0030	MX221	Munson Mixer	
EU0040	VS223	Rotex Oversize Screen	
EU0050	BH222	Sesco 20 ft. Elevator	
EU0060	BH224	Sesco 27 ft. Elevator	
EU0070	TV213	Bagging Hopper #1	30 to 50 lb.
EU0080	TV221	Bagging Hopper #2	6 to 20 lb.
EU0090	PE240	Bag Filter #1	30 to 50 lb.
EU0100	PE270	Bag Filter #2	6 to 20 lb.
EU0110	BH243	Reject Elevator	

**Permit Condition EU0010-001 through EU0110-001**

10 CSR 10-6.220  
**Restriction of Emission of Visible Air Contaminants**  
 10 CSR 10-6.400  
**Restriction of Emission of Particulate Matter From Industrial Processes**

**Emission Limitations:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source, visible emissions with an opacity greater than 20%.
- 2) The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60%.
- 3) The permittee shall not emit particulate matter from these emission units in excess of 11.23 lb/hr.
- 4) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.3 grains per standard cubic feet of exhaust gases.

**Operational Requirements:**

- 1) The baghouse (SF250) associated with these units shall be operating at all times when any of EU0010 through EU0110 are operating. This requirement excludes periods of startup, shutdown, and malfunction.
- 2) The baghouse (SF250) associated with these units shall be operated within a pressure drop range of 0.7 inches water and 3.0 inches water, a range known by the permittee's experience to represent normal operation with essentially no visible emissions.
- 3) Should the pressure drop fall out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal. If corrective action can not be taken within eight (8) hours, the affected process unit(s) shall be shut down.

**Monitoring:**

- 1) Monitoring is required only when the emission unit(s) are operating.
- 2) The installation shall conduct a daily monitoring of baghouse pressure drops to ensure that the pressure drop is maintained within normal operating range.
  - a) If the pressure drop across the baghouse is observed to be less than 0.7 inches water or greater than 3.0 inches water, the permittee shall immediately conduct USEPA Test Method 22 on the baghouse stack. If the emission unit has visible emissions perceived or believed to exceed the applicable opacity standard, the source representative shall then conduct a Method 9 observation.
  - b) The permittee shall determine the reason that the baghouse pressure drop was outside of the normal operating range and take appropriate corrective action to return the baghouse pressure drop to within 0.7 and 3.0 inches water.
- 3) The permittee shall conduct annually an opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer while the emission unit is operating and the baghouse pressure drop is between 0.7 inches water and 3.0 inches water.
- 4) The permittee shall inspect all filter bags prior to installation to ensure that all seams are properly sewn and the fabric is free from tears, cuts, or other damage.

**Recordkeeping:**

- 1) The permittee shall maintain records of all visible emission test method results (see Attachments A, B and C), noting whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions and the action(s) taken to restore equipment to normal operation (see Attachment D).
- 3) The permittee shall maintain the records of daily pressure drop readings across the baghouse, and all inspections of filter bags, noting the number of bags that were replaced (see Attachments E and F).
- 4) Attachments A, B, C, D, E and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit or after any instance when the daily pressure drop reading was observed to be below 0.7 inches water or above 3.0 inches water. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit shall be submitted no later than the annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.B.

**EU0120 – EU0130**  
Location: Building 18

Emission Unit	Equipment ID	EIQ Reference (2005)	Unit Description	Capacity
EU0120	TV265	1E4	DMHP Storage Tank	8,000 gal
EU0130	TV266	1E5	Chloral Storage Tank	11,240 gal

**Permit Condition EU0120-001 through EU0130-001**  
10 CSR 10-6.060  
**Construction Permits Required (#0498-001)**

**Operational Requirements:**

The permittee shall install and use vapor recovery lines from each of the storage tanks back to the tank truck unloading area so that the vapor displaced during unloading may be recovered.

**Recordkeeping:**

- 1) The permittee shall record the date and time of each delivery of raw material to the tanks, identify the tank that was filled, and note whether the vapor recovery lines were used (see Attachment G).
- 2) Attachment G contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 3) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report any deviations of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

**EU0140**  
Location: Building 18

Emission Unit	Equipment ID	EIQ Reference (2005)	Unit Description	Capacity
EU0140	TV222	1E2	Trichlorfon Reactor	1,500 gal

**Permit Condition EU0140-001**  
10 CSR 10-6.060  
**Construction Permits Required (#0498-001)**

**Operational Requirements:**

The permittee shall vent the reactor vapor through the carbon absorber (SF251) when charging chloral to the reactor from the chloral storage tank (EU0110).

**Recordkeeping:**

- 1) The permittee shall record the date and time of each transfer of material to the reactor and note whether the carbon absorber used (see Attachment G).
- 2) Attachment G contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 3) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report any deviations of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

**Process P2 – Liquid Formulation and Packaging**

**EU0150**

Location: Building 18

<b>Emission Unit</b>	<b>EIQ Reference (2005)</b>	<b>Unit Description</b>	<b>Capacity</b>
EU0150	2E5	Trifluralin Drum Auger	11 drums/hr

**Permit Condition EU0150-001**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

**Emission Limitations:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source, visible emissions with an opacity greater than 20%.
- 2) The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct a visual emission observation on this emission unit once a month using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions were observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) Should a violation be observed, monitoring frequency will progress in the following manner:

- a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after the date of the initial violation. Should no violation of this regulation be observed during this period, then,
  - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period, then,
  - c) Observations must be made once per month.
- 3) The permittee shall have an annual Certified Method 9 Test performed on these emission units.

**Recordkeeping:**

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

**Reporting:**

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

**Process P4 – Herbicide Synthesis (CC10)**

**EU0160 – EU0220**

Location: Building 15

<b>Emission Unit</b>	<b>Equipment ID</b>	<b>EIQ Reference (2005)</b>	<b>Unit Description</b>	<b>Capacity</b>
EU0160		4E7	Herbicide Technical Powder Charge	0.6 ton/hr
EU0170	TV751	4E8	Dispersion Tank	
EU0180	DR781	4E15	Product Dryer	
EU0190	ML780		Hammermill	
EU0200	TV782	4E16	Product Blender	
EU0210	BH780, BH781, BH782	4E13	Conveyor System to Product Dryer	
EU0220	BH784	4E17	Product Tote Filling Station/Auger	

**Permit Condition EU0160-001 through EU0220-001**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

10 CSR 10-6.400

**Restriction of Emission of Particulate Matter From Industrial Processes**

**Emission Limitations:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source, visible emissions with an opacity greater than 20%.
- 2) The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60%.
- 3) The permittee shall not emit particulate matter from these emission units in excess of 2.91 lb/hr.
- 4) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.3 grains per standard cubic feet of exhaust gases.

**Operational Requirements:**

- 1) The scrubber (SC780) associated with these units shall be operating at all times when any of EU0160 through EU0210 are operating. This requirement excludes periods of startup, shutdown, and malfunction.
- 2) The scrubber (SC780) associated with these units shall be operated within a pressure drop range of 1.0 inches water and 5.0 inches water, a range known by the permittee's experience to represent normal operation with essentially no visible emissions.
- 3) Should the pressure drop fall out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal. If corrective action can not be taken within eight (8) hours, the affected process unit(s) shall be shut down.

**Monitoring:**

- 1) Monitoring is required only when the emission unit(s) are operating.
- 2) The installation shall conduct a daily monitoring of scrubber pressure drop to ensure that it is maintained within normal operating range.
  - a) If the pressure drop across the scrubber is observed to be less than 1.0 inches water or greater than 5.0 inches water, the permittee shall immediately conduct USEPA Test Method 22 on the scrubber stack. If the emission unit has visible emissions perceived or believed to exceed the applicable opacity standard, the source representative shall then conduct a Method 9 observation.
  - b) The permittee shall determine the reason that the scrubber pressure drop was outside of the normal operating range and take appropriate corrective action to return the pressure drop to within 1.0 and 5.0 inches water.
- 3) The permittee shall conduct annually an opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer while the emission unit is operating and the scrubber pressure drop is between 1.0 inches water and 5.0 inches water.

**Recordkeeping:**

- 1) The permittee shall maintain records of all visible emission test method results (see Attachments A, B and C), noting whether the visible emissions were normal for the process.

- 2) The permittee shall maintain records of any equipment malfunctions and the action(s) taken to restore equipment to normal operation (see Attachment D).
- 3) The permittee shall maintain the records of daily pressure drop readings across the scrubber, and records of all maintenance and inspections completed on this control device (see Attachments E and F).
- 4) Attachments A, B, C, D, E and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit or after any instance when the daily pressure drop reading was observed to be below 1.0 inches water or above 5.0 inches water. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit shall be submitted no later than the annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.B.

**Process P5 – Liquid Flowable Formulation and Shipping (CC50)**

**EU0230 – EU0250**

Location: Building 14

<b>Emission Unit</b>	<b>EIQ Reference (2005)</b>	<b>Equipment ID</b>	<b>Unit Description</b>	<b>Capacity</b>
EU0230	5E2	TV117	Formulation Tank	5,441 gal
EU0240	5E2	TV118	Formulation Tank	5,441 gal
EU0250	5E3	TV245	Pregel (Raw Material) Tank	500 gal

**Permit Condition EU0230-001 through EU0250-001**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

**Emission Limitations:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source, visible emissions with an opacity greater than 20%.
- 2) The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60%.

**Operational Requirements:**

- 1) The baghouse (CD15) associated with these units shall be operating at all times when any of EU0230 through EU0250 are operating. This requirement excludes periods of startup, shutdown, and malfunction.
- 2) The baghouse (CD15) associated with these units shall be operated within a pressure drop range of 1.5 inches water and 5.0 inches water, a range known by the permittee's experience to represent normal operation with essentially no visible emissions.
- 3) Should the pressure drop fall out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal. If corrective action can not be taken within eight (8) hours, the affected process unit(s) shall be shut down.

**Monitoring:**

- 1) Monitoring is required only when the emission unit(s) are operating.
- 2) The installation shall conduct a daily monitoring of baghouse pressure drops to ensure that the pressure drop is maintained within normal operating range.
  - a) If the pressure drop across the baghouse is observed to be less than 1.5 inches water or greater than 5.0 inches water, the permittee shall immediately conduct USEPA Test Method 22 on the baghouse stack. If the emission unit has visible emissions perceived or believed to exceed the applicable opacity standard, the source representative shall then conduct a Method 9 observation.
  - b) The permittee shall determine the reason that the baghouse pressure drop was outside of the normal operating range and take appropriate corrective action to return the baghouse pressure drop to within 1.5 and 5.0 inches water.
- 3) The permittee shall conduct annually an opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer while the emission unit is operating and the baghouse pressure drop is between 1.5 inches water and 5.0 inches water.
- 4) The permittee shall inspect all filter bags prior to installation to ensure that all seams are properly sewn and the fabric is free from tears, cuts, or other damage.

**Recordkeeping:**

- 1) The permittee shall maintain records of all visible emission test method results (see Attachments A, B and C), noting whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions and the action(s) taken to restore equipment to normal operation (see Attachment D).
- 3) The permittee shall maintain the records of daily pressure drop readings across the baghouse, and all inspections of filter bags, noting the number of bags that were replaced (see Attachments E and F).
- 4) Attachments A, B, C, D, E and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit or after any instance when the daily pressure drop reading was observed to be below 1.5 inches water or above 5.0 inches water. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit shall be submitted no later than the annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.B.

**Process P6 – Liquid Flowable Formulation (CC15)**

**EU0260 – EU0270**  
Location: Building 13

Emission Unit	EIQ Reference (2005)	Equipment ID	Unit Description	Capacity
EU0260	6E1		Technical Dump Station	130 gal/hr
EU0270	6E2	TV500	Formulation Tank	5,200 gal

**Permit Condition EU0260-001 through EU0270-001**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

**Emission Limitations:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source, visible emissions with an opacity greater than 20%.
- 2) The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60%.

**Operational Requirements:**

- 1) The baghouse (CD14) associated with these units shall be operating at all times when either EU0260 or EU0270 are operating. This requirement excludes periods of startup, shutdown, and malfunction.
- 2) The baghouse (CD14) associated with these units shall be operated within a pressure drop range of 1.0 inches water and 4.0 inches water, a range known by the permittee's experience to represent normal operation with essentially no visible emissions.
- 3) Should the pressure drop fall out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal. If corrective action can not be taken within eight (8) hours, the affected process unit(s) shall be shut down.

**Monitoring:**

- 1) Monitoring is required only when the emission unit(s) are operating.
- 2) The installation shall conduct a daily monitoring of baghouse pressure drops to ensure that the pressure drop is maintained within normal operating range.
  - a) If the pressure drop across the baghouse is observed to be less than 1.0 inches water or greater than 4.0 inches water, the permittee shall immediately conduct USEPA Test Method 22 on the baghouse stack. If the emission unit has visible emissions perceived or believed to exceed the applicable opacity standard, the source representative shall then conduct a Method 9 observation.
  - b) The permittee shall determine the reason that the baghouse pressure drop was outside of the normal operating range and take appropriate corrective action to return the baghouse pressure drop to within 1.0 and 4.0 inches water.

- 3) The permittee shall conduct annually an opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer while the emission unit is operating and the baghouse pressure drop is between 1.0 inches water and 4.0 inches water.
- 4) The permittee shall inspect all filter bags prior to installation to ensure that all seams are properly sewn and the fabric is free from tears, cuts, or other damage.

**Recordkeeping:**

- 1) The permittee shall maintain records of all visible emission test method results (see Attachments A, B and C), noting whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions and the action(s) taken to restore equipment to normal operation (see Attachment D).
- 3) The permittee shall maintain the records of daily pressure drop readings across the baghouse, and all inspections of filter bags, noting the number of bags that were replaced (see Attachments E and F).
- 4) Attachments A, B, C, D, E and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit or after any instance when the daily pressure drop reading was observed to be below 1.0 inches water or above 4.0 inches water. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit shall be submitted no later than the annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.B.

**Process P12 – Dicamba Neutralization Process (CC03)**

**EU0280 – EU0290**  
Location: Building 15

<b>Emission Unit</b>	<b>EIQ Reference (2005)</b>	<b>Unit Description</b>	<b>Capacity</b>
EU0280	12E5	Finished Product Conveyor and Bagging	0.07 ton/hr
EU0290	12E1	Dicamba Collection Hopper	

**Permit Condition EU0280-001 through EU0290-001**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

**Emission Limitations:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source, visible emissions with an opacity greater than 20%.
- 2) The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60%.

**Operational Requirements:**

- 1) The baghouse (CD27) associated with these units shall be operating at all times when either EU0260 or EU0270 are operating. This requirement excludes periods of startup, shutdown, and malfunction.
- 2) The baghouse (CD27) associated with these units shall be operated within a pressure drop range of 1.0 inches water and 6.0 inches water, a range known by the permittee's experience to represent normal operation with essentially no visible emissions.
- 3) Should the pressure drop fall out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal. If corrective action can not be taken within eight (8) hours, the affected process unit(s) shall be shut down.

**Monitoring:**

- 1) Monitoring is required only when the emission unit(s) are operating.
- 2) The installation shall conduct a daily monitoring of baghouse pressure drops to ensure that the pressure drop is maintained within normal operating range.
  - a) If the pressure drop across the baghouse is observed to be less than 1.0 inches water or greater than 6.0 inches water, the permittee shall immediately conduct USEPA Test Method 22 on the baghouse stack. If the emission unit has visible emissions perceived or believed to exceed the applicable opacity standard, the source representative shall then conduct a Method 9 observation.
  - b) The permittee shall determine the reason that the baghouse pressure drop was outside of the normal operating range and take appropriate corrective action to return the baghouse pressure drop to within 1.0 and 6.0 inches water.
- 3) The permittee shall conduct annually an opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer while the emission unit is operating and the baghouse pressure drop is between 1.0 inches water and 6.0 inches water.
- 4) The permittee shall inspect all filter bags prior to installation to ensure that all seams are properly sewn and the fabric is free from tears, cuts, or other damage.

**Recordkeeping:**

- 1) The permittee shall maintain records of all visible emission test method results (see Attachments A, B and C), noting whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions and the action(s) taken to restore equipment to normal operation (see Attachment D).
- 3) The permittee shall maintain the records of daily pressure drop readings across the baghouse, and all inspections of filter bags, noting the number of bags that were replaced (see Attachments E and F).
- 4) Attachments A, B, C, D, E and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit or after any instance when the daily pressure drop reading was observed to be below 1.0 inches water or above 6.0 inches water. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit shall be submitted no later than the annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.B.

**EU0300 – EU0330**

Location: Building 15

<b>Emission Unit</b>	<b>EIQ Reference (2005)</b>	<b>Unit Description</b>	<b>Capacity</b>
EU0300	12E2	Drum Auger	0.07 ton/hr
EU0310	12E2	Tote Fill Conveyor	
EU0320	12E3	Littleford Blender	
EU0330	12E6	Technical Charge Tote Bag Filling	

**Permit Condition EU0300-001 through EU0330-001**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants**

**Emission Limitations:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source, visible emissions with an opacity greater than 20%.
- 2) The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60%.

**Operational Requirements:**

- 1) The scrubber (CD19) associated with these units shall be operating at all times when any of EU0160 through EU0210 are operating. This requirement excludes periods of startup, shutdown, and malfunction.
- 2) The scrubber (CD19) associated with these units shall be operated within a pressure drop range of 5.0 inches water and 10.0 inches water, a range known by the permittee's experience to represent normal operation with essentially no visible emissions.
- 3) Should the pressure drop fall out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal. If corrective action can not be taken within eight (8) hours, the affected process unit(s) shall be shut down.

**Monitoring:**

- 1) Monitoring is required only when the emission unit(s) are operating.
- 2) The installation shall conduct a daily monitoring of scrubber pressure drop to ensure that it is maintained within normal operating range.

- a) If the pressure drop across the scrubber is observed to be less than 5.0 inches water or greater than 10.0 inches water, the permittee shall immediately conduct USEPA Test Method 22 on the scrubber stack. If the emission unit has visible emissions perceived or believed to exceed the applicable opacity standard, the source representative shall then conduct a Method 9 observation.
  - b) The permittee shall determine the reason that the scrubber pressure drop was outside of the normal operating range and take appropriate corrective action to return the pressure drop to within 5.0 and 10.0 inches water.
- 3) The permittee shall conduct annually an opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer while the emission unit is operating and the plate scrubber pressure drop is between 5.0 inches water and 10.0 inches water.

**Recordkeeping:**

- 1) The permittee shall maintain records of all visible emission test method results (see Attachments A, B and C), noting whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions and the action(s) taken to restore equipment to normal operation (see Attachment D).
- 3) The permittee shall maintain the records of daily pressure drop readings across the scrubber, and records of all maintenance and inspections completed on this control device (see Attachments E and F).
- 4) Attachments A, B, C, D, E and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit or after any instance when the daily pressure drop reading was observed to be below 5.0 inches water or above 10.0 inches water. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit shall be submitted no later than the annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.B.

## IV. Core Permit Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

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

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

**10 CSR 10-6.065 Operating Permits**

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

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

**10 CSR 10-6.150 Circumvention**

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

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

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

- a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
- b) Paving or frequent cleaning of roads, driveways and parking lots;
- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

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

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. Qualified personnel shall perform all tests.
- 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 10-2.100 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Omnium, LLC from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

#### **10 CSR 10-2.070 Restriction of Emission of Odors**

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 requirement is not federally enforceable.**

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

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

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

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

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

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

- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
  - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

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

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

## V. General Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

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

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

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

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

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

This permit may be reopened for cause if:

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

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

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

## VI. Attachments

Attachments follow.





**Attachment C**

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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

\_\_\_\_\_  
 Signature of Observer

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**Attachment D**

**Malfunction and Repair Log**

**Date:** \_\_\_\_\_

**Incident of Malfunction:** \_\_\_\_\_

**Impact on Emissions:** \_\_\_\_\_

**Duration of Event:** \_\_\_\_\_

**Probable Cause:** \_\_\_\_\_

**Corrective Actions:** \_\_\_\_\_







**Attachment H**

**Required Control Device Operating Ranges**

The following table provides a summary of control devices that support emission units subject to 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* and/or 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*.

Required Operating Ranges for Baghouses and Scrubbers		
Control Device	Process Number	Pressure Drop Range (inches of water)
Baghouse – SF250	CC81	0.7 to 3.0
Scrubber – SC780	CC10	1.0 to 5.0
Baghouse – CD15	CC50	1.5 to 5.0
Baghouse – CD14	CC15	1.0 to 4.0
Baghouse – CD27	CC03	1.0 to 6.0
Scrubber – CD19	CC03	5.0 to 10.0

## STATEMENT OF BASIS

### **Voluntary Limitations**

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

### **Permit Reference Documents**

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

- 1) Intermediate Operating Permit Application, received March 30, 2006;
- 2) 2005 Emissions Inventory Questionnaire, received March 31, 2006; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

#### *10 CSR 10-6.100, Alternate Emission Limits*

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

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

The boiler (0.91 MMBtu/hr) located in the administration building is natural gas fired and therefore is exempt from this rule. Also, the permittee purchases steam for process heat from St. Joseph Light & Power. Therefore, none of the processes are subject to the specific limitations of this regulation.

#### *10 CSR 10-2.320, Control of Emissions from Production of Pesticides and Herbicides,*

This rule applies only to sources in Clay, Jackson, and Platte Counties. This installation is located in Buchanan County.

### **Construction Permit Revisions**

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

#### *Construction Permit #0498-001*

The permittee applied for an amendment to Special Condition #2 of this permit, that states, "Omnium, LLC shall also install and use vapor recovery lines to recover vapor while charging the reactor vessel." This amendment was requested because the reactor vapor recovery system was not functioning properly and the permittee wanted to install alternate controls. In response to this application the Air Pollution Control Program (APCP) sent a letter on May 24, 2006, determining that no permit is required for

change in operation. As a result, the wording of this requirement was changed to reflect alternate controls.

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

40 CFR 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 rule applies to vessels with a storage capacity greater than or equal to 75m<sup>3</sup> (19,813 gal) constructed, reconstructed or modified after July 23, 1984. All of the facility's VOL storage tanks constructed after this date have capacity less than 75m<sup>3</sup>.

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

40 CFR Part 63, Subpart MMM

The installation originally had submitted a notification to EPA that they would be subject to this rule. However, prior to the compliance date (June 23, 2002), the installation ceased operation associated with xylene and methylisobutylketone in process P4. The process involving these two HAPs had caused the installation to be above the major source threshold for HAPs. Once those operations had ceased, the facility was not subject to the rule.

#### **Other Regulatory Determinations**

*Construction Permit #0381-003A, issued March 16, 1981*

This permit applied to the construction of equipment associated with soybean processing, which is no longer done at this facility. Therefore, no conditions in this construction permit are relevant to this installation.

*Construction Permit #0792-012, issued July 8, 1992*

This permit authorized construction of a packaging process that consisted of a feeding/densifying hopper and a polyvinyl alcohol-packaging machine. This equipment was installed but has since been removed.

*Construction Permit #1294-013, issued November 27, 1994*

This permit allowed the construction of a flare to burn gaseous ammonia, which was a waste stream of a reaction process in P4. The equipment associated with this permit is no longer operating. Therefore, the special conditions of this permit no longer apply.

*Construction Permit #1196-013, issued November 5, 1996*

This permit authorized construction of herbicide manufacturing equipment. The only special condition contained in the permit is a restatement of 10 CSR 10-2.070. Hence, no conditions from this permit are unique and need to be listed.

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

This rule applies to the non-indirect heating sources at this installation with the potential to emit particulate matter. This includes the emission units listed in the table below. The table contains data used in calculations of each emission unit's potential to emit PM (including the effect of emission controls) and the allowable PM emission rate based on maximum hourly process throughput. The results in the table demonstrate that none of these emission units can violate the limits of this rule when the installed control devices for each unit are operating properly. The remaining emission units that emit PM are exempt from this regulation because they have the potential to emit less than 0.5 lb/hr of PM, in accordance with 10 CSR 10-6.400(1)(B)11.

Emission Units	MHDR (ton/hr)	Emission Factor (lb/ton)	Uncontrolled Emission Rate (lb/hr)	Emission Limit (lb/hr) <sup>1</sup>
EU0010 through EU0100	4.5	0.14	0.63	11.23
EU0160 through EU0220	0.6	0.14	0.084	2.91

<sup>1</sup> As calculated in accordance with 10 CSR 10-6.400

**Particulate Matter Compliance Method**

All emission units at Omnium’s facility that are subject to PM emission limits are equipped with a baghouse or a scrubber, each of which controls the release of high-value product from its respective process. Hence, the company benefits materially by maximizing baghouse control efficiency and by reducing the probability of a baghouse malfunction or bag failure. Therefore, to increase monitoring flexibility without reducing environmental protection, the company requested that it be allowed to monitor baghouse performance as the method for demonstrating compliance with applicable PM emission limitations (10 CSR 10-6.400 and 10 CSR 10-6.220).

Based on its operating experience, the company believes that, if process baghouses and scrubbers are maintained and operated within a pressure drop range known to correspond to the highest achievable PM control efficiency, PM emissions will be reduced to the lowest possible rate and their visible opacity essentially will be zero. The APCP agrees with this principle and, therefore, has incorporated into the operating permit a method by which Omnium may demonstrate compliance with both the process weight (10 CSR 10-6.400) and opacity emission limits (10 CSR 10-6.220). This consists of daily readings of the pressure drop across each affected baghouse and scrubber. Omnium may use pressure drop readings to demonstrate ongoing compliance with the process weight and opacity emission limits only if the pressure drop of the control devices are maintained within the range associated with optimal control efficiency (see Attachment H). The acceptable pressure drop range for each control device is also specified within the permit conditions for each emission unit that requires this monitoring. This condition is consistent with Omnium’s assertions regarding baghouse and scrubber effectiveness within the pressure drop ranges prescribed for each associated control device.

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

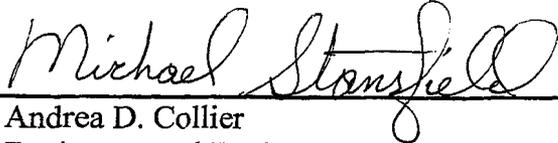
Any regulation that is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 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 that is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with

such regulation(s). If the installation is not in compliance with a regulation that was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

for/   
\_\_\_\_\_  
Andrea D. Collier  
Environmental Engineer