Missouri Department of NATURAL RESOURCES dnr.mo.gov

Michael L. Parson, Governor Carol S. Comer, Director

DEC 2 1 2018

Mr. Anu Singh
Precoat Metals
4301 South Spring Avenue
St. Louis, MO 63116

Re: Part 70 Operating Permit Renewal
Installation ID: 510-0027, Permit Number: OP2018-115

Dear Mr. Singh:

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bgj

Enclosures

c: PAMS File: 2016-02-005

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MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2018-115
Expiration Date: DEC 2 1 2023
Installation ID: 510-0027
Project Number: 2016-02-005

Installation Name and Address
Precoat Metals
4301 South Spring Avenue
St. Louis, MO 63116
City of St. Louis

Parent Company's Name and Address
Precoat Metals
1310 Papin Street; 3rd Floor
St. Louis MO, 63116

Installation Description:
Precoat Metals operates two continuous metal coil surface coating lines. Coil line 1 consists of an aqueous pretreatment section (cleaning, rinsing, chemical treatment), a prime coating section (coater and oven), a printer coater and ultraviolet curing station and a finish coating section (coater, oven and combined oxidizer for the prime and finish ovens and dual fired waste heat boiler). Coil line 2 consists of an aqueous pretreatment section (cleaning, scrubbing, rinsing, and chemical treatment), a prime coating section (coater, oven, and oxidizer) and a finish coating section (coater, oven, oxidizer, and combined waste heat boiler). The installation has six bulk solvent storage tanks, a gas-fired boiler, and a variety of maintenance activities including grinding, degreasing, and sandblasting.

DEC 2 1 2018
Effective Date

Director or Designee
Department of Natural Resources

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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 Unit #	EIQ Reference #	Description of Emission Unit
EU0010		Metal Coil Prime Coat Operation-Line #1
EU0020		Metal Coil Finish Coat Operation-Line #1
EU0040		Metal Coil Prime Coat Operation-Line #2
EU0050		Metal Coil Finish Coat Operation-Line #2
EU0060		Boiler
EU0070		Waste Heat Boiler – Line #1
EU0090		Maintenance Parts Washer
EU0110		Two (2) Natural Gas-fired Emergency Generators

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.

Description of Emission Source
0.82 MMBtu/hr Radiant Heaters
1.88 MMBtu/hr Space Heaters
6-560 gallon solvent storage tanks-no longer used
3-Natural gas burners for thermal oxidizers (2 for Line 2, 1 for Line 1)
Line 1 Prime Water Cooler
Line 1 Finish Water Cooler
Line 2 Prime Water Cooler
Line 2 Finish Water Cooler
Multiple open top tanks for alkaline cleaning of coil
Multiple open top tanks for water rinse of coil
Multiple open top tanks for inorganic chemical treatment of coil
Paint and solvent container storage vaults for Line 1
Paint and Solvent Storage vault with four (4) rooms
Roll grinder
Portable enclosed sand blaster
Solvent cleanup of coating applicators
Rub Test using Methyl Ethyl Ketone & Hexane
Printer Coat Operation with ultraviolet curing station (EU0030)
Core Cutter

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 Specific 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.

EU0010 and EU0020 – Coating Line 1
EU0040 and EU0050 – Coating Line 2

Both Coating lines are equipped with thermal oxidizers to control VOCs & HAPs

Emission Unit	Description	Manufacturer	2016 EIQ Reference #
EU0010	Line #1 Prime Coater and Curing Oven	Waldron-coater/Precoat-oven	EP-01/EP-02
EU0020	Line #1 Finish Coater and Curing Oven	Waldron-coater/Ross-oven	EP-04/EP-05
EU0040	Line #2 Prime Coater and Curing Oven	Faustel-coater/Mahon – oven	EP-07/EP-08
EU0050	Line #2 Finish Coater and Curing Oven	Faustel-coater/Mahon – oven	EP-10/EP-11

Permit Condition (EU0010, EU0020, EU0040 and EU0050) -001

10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No. 95-04-047F

Emission Limitation:

1) The permittee shall not allow VOC emissions from Coating Line #1 and Coating Line #2 combined to exceed 164.4 tons per rolling twelve (12)-month period.
2) The permittee shall limit the usage of paint plus reduction solvent VOC's at the installation to less than or equal to 10.1 million pounds per consecutive twelve (12)-month period.
3) Overall control efficiency for Coating Line #1 shall be 95.7% or greater as demonstrated during performance testing conducted December, 1997.
4) Overall control efficiency for Coating Line #2 shall be 95.7% or greater as demonstrated during performance testing conducted October, 1994.

Monitoring:

1) The permittee shall monitor the daily usage of coating and reduction solvent.
2) The permittee shall continuously monitor the combustion chamber temperatures of each thermal oxidizer when in operation.

Recordkeeping:

1) The permittee shall maintain a record of the daily usage of coating and reduction solvent for each coating operation.
2) The permittee shall maintain a record of the VOC emission calculations for Coating Line #1 and Coating Line #2.
   a) Emissions factors for VOC emissions may be obtained from the safety data sheet (SDS) for each material used; if a range of VOC contents are provided, the permittee shall use the highest value in the range to demonstrate compliance. If the VOC content is listed in percent by weight (wt%) the VOC content can be calculated using the following equation: (examples given for VOC's).

VOC content (lb/gal) = Density (lb/gal) x VOC content (wt%)

If specific gravity is listed the density can be calculated using the following equation:
Density (lb/gal) = Specific Gravity x 8.34 lb/gal

3) The permittee shall maintain a continuous record of the combustion chamber temperatures for each thermal oxidizer when in operation.

Reporting:

1) The permittee shall submit to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, or AirComplianceReporting@dnr.mo.gov, a quarterly report detailing the monthly paint and reduction solvent usage and the monthly VOC emissions. Overall control efficiency as determined by stack testing shall be used to calculate emissions.
2) The permittee shall also report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification as required by Section V of this permit.

Permit Condition (EU0010, EU0020, EU0040 and EU0050) -002

10 CSR 10-5.330
Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:

The permittee shall not cause, allow, or permit the discharge into the ambient air of any VOCs in excess of two and six-tenths (2.6) pounds of VOC per gallon of coating (minus water and exempt compounds) as delivered to the coating applicator(s). [10 CSR 10-5.330(3)(F)2.]

Method and Determination of Compliance: [10 CSR 10-5.330(3)(F)3.]

1) VOC content of coatings – The permittee shall determine the daily volume-weighted average VOC content of all coatings used in the surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), per 10 CSR 10-5.330(5)(C)3.A. The surface coating unit is in compliance if this value is less than or equal to the emission limits.
   a) The daily volume-weighted average VOC content of all coatings used in a surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), shall be calculated using the following equation:

$$DAVG_{VW} = \frac{\sum_{i=1}^{n}(A_i \times B_i)}{C}$$

Where:
$DAVG_{VW}$ = daily volume-weighted average VOC content, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
A = daily gallons of each coating used (minus water and exempt compounds) in a surface coating unit;
C = total daily gallons of coatings used (minus water and exempt compounds) in a surface coating unit;
n = number of coatings used in a surface coating unit; and

B = VOC content of the coating as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds).

b) VOC content of the coating as applied (B), expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). This is determined using the following equation per Subparagraph (5)(C)1.A. of 10 CSR 10-5.330.

$$B = \frac{D_c \times W_o}{1 - \left(\frac{D_c \times W_w}{8.33}\right) - \left(\sum_{j=1}^{m} \frac{D_c \times W_{Ej}}{D_{Ej}}\right)}$$

Where:
D_C = density of coating as applied, expressed as pounds per gallon;
W_O = weight fraction of regulated VOC in the coating, as applied. This value does not include the weight fraction of water or exempt compounds;
W_W = weight fraction of water in the coating, as applied;
W_E = weight fraction of exempt compounds in the coating, as applied;
D_E = density of each exempt compound, expressed as pounds per gallon;
m = number of exempt compounds in the coating; and
8.33 = density of water, expressed as pounds per gallon.

2) Combination of VOC content of coatings and add-on controls – The permittee shall calculate the required control system efficiency per 10 CSR 10-5.330(5)(C)4.. The surface coating unit is in compliance if the actual overall control system efficiency is greater than or equal to the required control system efficiency; or
3) Control system - The overall control system efficiency must be ninety percent (90%) or greater.

Recordkeeping:

1) The permittee shall keep records as necessary to determine compliance. Records kept should be appropriate for the facility, their products, and operations. These may include, as applicable, one (1) or more of the following:
   a) Current list of coatings used and the VOC content as applied;
   b) Daily volume usage of each coating;
   c) Records of the weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating VOC content;
   d) Annual VOC emissions from surface coating equipment cleaning; and
   e) All test results to determine coating properties.
2) Records such as daily production rates may be substituted for actual daily coating use measurements provided the permittee submits a demonstration, approved by the Director, that these records are adequate for the purposes of this rule.
3) The permittee may use Attachments A and B for recordkeeping 1 and 2, or equivalent forms of its own, so long as the forms used will accurately demonstrate compliance with the recordkeeping requirements of 1 and 2.
4) The permittee shall maintain daily records of key system operating parameters for emission control equipment including, but not limited to:
   a) Identification of the type of emissions control system used;
   b) Hours of operation;
   c) Routine and non-routine maintenance, including dates and duration of any outages;
   d) Records of test reports conducted;

e) For the thermal oxidizer the permittee shall comply with the following requirements:
   i) Continuous temperature monitoring and recording equipment shall be installed and operated to accurately measure the operating temperature(s) for the control device; and
   ii) The following information shall be collected and recorded each day of operation of the surface coating unit and the control device:
      (1) A log or record of the operating time for the control device, monitoring equipment, and the associated surface coating unit;
      (2) For thermal oxidizers, all three (3)-hour periods of operation during which the average combustion temperature was more than fifty degrees Fahrenheit (50 °F) below the average combustion temperature during the most recent emission test that demonstrated that the surface coating unit was in compliance;

5) The required records shall be retained by the permittee for a minimum of five (5) years. These records shall be made available to the director upon request.

Reporting:

1) The permittee shall provide a written report to the Missouri Department of Natural Resources Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than twenty (20) days after the permittee determined that the emission unit exceeded the emission limitation.
2) The permittee shall also report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification as required by Section V of this permit.

Permit Condition (EU0010, EU0020, EU0040 and EU0050) -003

10 CSR 10-6.065 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart SSSS National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

Emission Limitation:

The permittee must limit organic HAP emissions to the level specified in §63.5120(a)(1) or (a)(2) (listed below): [§63.5120(a)]

1) No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); [§63.5120(a)(1)] or
2) No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period. [§63.5120(a)(2)]

Operating Limitations:

For any coil coating line for which the permittee uses an add-on control device, the permittee must meet the applicable operating limits specified below (from Table 1 to 40 CFR 63 Subpart SSSS). The permittee must establish the operating limits during the performance test according to the requirements in §63.5160(d)(3). The permittee must meet the operating limits at all times. [§63.5121(a)]

For the following device …	The permittee must meet the following operating limit …	And the permittee must demonstrate continuous compliance with the operating limit by …
Thermal oxidizer	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.5160(d)(3)(i)	i. Collecting the combustion temperature data according to §63.5150(a)(3); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system	Develop a monitoring plan that identifies operating parameter to be monitored and specifies operating limits according to §63.5150(a)(4)	Conducting monitoring according to the plan §63.5150(a)(4).

General Requirements:

1) The permittee must be in compliance with the standards in this subpart at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart. If the permittee is complying with the emission standards of this subpart without the use of a capture system and control device, the permittee must be in compliance with the standards at all times, including periods of start-up, shutdown, and malfunction. [§63.5140(a)]
2) Table 2 to 40 CFR Part 63 Subpart SSSS provides cross references to Subpart A of 40 CFR Part 63, indicating the applicability of the General Provisions requirements to Subpart SSSS. [§63.5140(b)]

Monitoring/Compliance Demonstration:

1) Control Device Monitoring Requirements [§63.5150]:
   a) To demonstrate continuing compliance with the standards, the permittee must monitor and inspect each capture system and each control device required to comply with §63.5120 following the date on which the initial performance test of the capture system and control device is completed. The permittee must install and operate the monitoring equipment as specified §63.5150(a)(3) and (4). [§63.5150(a)]

i) *Temperature monitoring of oxidizers*. If the permittee is complying with the requirements of the standards in §63.5120 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, the permittee must comply with §63.5150(a)(3)(i) through (iii). [§63.5150(a)(3)]
   (1) Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. The permittee must replace the equipment either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 °Celsius, whichever is greater. [§63.5150(a)(3)(i)]
   (2) For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to §63.5160(d)(3)(i), the permittee must install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone. [§63.5150(a)(3)(ii)]

ii) *Capture system monitoring*. The permittee must develop a capture system monitoring plan containing the information specified in §63.5150(a)(4)(i) and (ii). The permittee must monitor the capture system in accordance with §63.5150(a)(4)(iii). The permittee must make the monitoring plan available for inspection by the permitting authority upon request. [§63.5150(a)(4)]
   (1) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures. [§63.5150(a)(4)(i)]
   (2) The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in §63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system. [§63.5150(a)(4)(ii)]
   (3) The permittee must conduct monitoring in accordance with the plan. [§63.5150(a)(4)(iii)]

b) Any deviation from the required operating parameters which are monitored in accordance with §63.5150(a)(3) and (4), unless otherwise excused, will be considered a deviation from the operating limit. [§63.5150(b)]

2) Compliance Demonstration [§63.5170]:
The permittee must include all coating materials (as defined in §63.5110) used in the affected source when determining compliance with the applicable emission limit in §63.5120. To make this determination, the permittee must use at least one of the four compliance options listed in Table 1 of §63.5170. The permittee may apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. The permittee may use different compliance options for different coil coating lines, or at different times on the same line. However, the permittee may not use different compliance options at the same time on the same coil coating line. If the permittee switches between compliance options for any coil coating line or group of lines, the permittee must document this switch as required by §63.5190(a), and the permittee must report it in the next semiannual compliance report required in §63.5180.

Table 1 to §63.5170—Compliance Demonstration Requirements Index

If the permittee chooses to demonstrate compliance by:	Then the permittee must demonstrate that:
1. Use of "as purchased" compliant coatings	a) Each coating material used during the 12-month compliance period does not exceed 0.046 kg HAP per liter solids, as purchased. [§63.5170(a)].
2. Use of "as applied" compliant coatings	a) Each coating material used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. [§63.5170(b)(1)] or
	b) Average of all coating materials used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. [§63.5170(b)(2)].
3. Use of a capture system and control device	Overall organic HAP control efficiency is at least 98 percent on a monthly basis for individual or groups of coil coating lines; or overall organic HAP control efficiency is at least 98 percent during initial performance test and operating limits are achieved continuously for individual coil coating lines; or oxidizer outlet HAP concentration is no greater than 20 ppmv and there is 100 percent capture efficiency during initial performance test and operating limits are achieved continuously for individual coil coating lines. [§63.5170(c)].
4. Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate	Average equivalent emission rate does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. [§63.5170(d)].

a) *As-purchased compliant coatings*. If the permittee elects to use coatings that individually meet the organic HAP emission limit in §63.5120(a)(2) as-purchased, to which the permittee will not add HAP during distribution or application, the permittee must demonstrate that each coating material applied during the 12-month compliance period contains no more than 0.046 kg HAP per liter of solids on an as-purchased basis. [§63.5170(a)]
   i) Determine the organic HAP content for each coating material in accordance with §63.5160(b) and the volume solids content in accordance with §63.5160(c). [§63.5170(a)(1)]
   ii) Combine these results using Equation 1 of this section and compare the result to the organic HAP emission limit in §63.5120(a)(2) to demonstrate that each coating material contains no more organic HAP than the limit. [§63.5170(a)(2)]

$$H_{siap} = \frac{C_{hi} D_i}{V_{si}} \qquad (Eq.1)$$

Where:

H_{siap} = as-purchased, organic HAP to solids ratio of coating material, i, kg organic HAP/liter solids applied.

C_{hi} = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

D_i = density of coating material, i, kg/l.
V_{si} = volume fraction of solids in coating, i, l/l.

b) *As-applied compliant coatings*. If the permittee chooses to use "as-applied" compliant coatings, the permittee must demonstrate that the average of each coating material applied during the 12-month compliance period contains no more than 0.046 kg of organic HAP per liter of solids applied in accordance with §63.5170(b)(1), or demonstrate that the average of all coating materials applied during the 12-month compliance period contain no more than 0.046 kg of organic HAP per liter of solids applied in accordance with §63.5170(b)(2). [§63.5170(b)]

i) To demonstrate that the average organic HAP content on the basis of solids applied for each coating material applied, HSi yr, is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation 2 of §63.5170: [§63.5170(b)(1)]

$$H_{Si\,yr} = \frac{\sum_{y=1}^{12}\left[V_i\ D_i C_{ahi} + \sum_{i=1}^{q} V_j\ D_j C_{hij}\right]}{\sum_{y=1}^{12} V_i V_{si}} \qquad (Eq.\,2)$$

Where:

$H_{si\,yr}$ = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of material, i, kg organic HAP/liter solids applied.
V_i = volume of coating material, i, l.
D_i = density of coating material, i, kg/l.
C_{ahi} = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.
V_j = volume of solvent, j, l.
D_j = density of solvent, j, kg/l.
C_{hij} = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.
V_{si}= volume fraction of solids in coating, i, l/l.
y = identifier for months.
q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

ii) To demonstrate that the average organic HAP content on the basis of solids applied, $H_{S\,yr}$, of all coating materials applied is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation 3 of §63.5170: [§63.5170(b)(2)]

$$H_{S\,yr} = \frac{\sum_{y=1}^{12}\left[\sum_{i=1}^{p} V_i\ D_i C_{ahi} + \sum_{j=1}^{q} V_j\ D_j C_{hij}\right]}{\sum_{y=1}^{12}\left[\sum_{i=1}^{q} V_i V_{si}\right]} \qquad (Eq.\,3)$$

Where:

$H_{S\,yr}$ = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of all materials applied, kg organic HAP/liter solids applied.

V_i = volume of coating material, i, l.

D_i = density of coating material, i, kg/l.

C_{ahi} = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

V_j = volume of solvent, j, l.

D_j = density of solvent, j, kg/l.

C_{hij} = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

V_{si} = volume fraction of solids in coating, i, l/l.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

y = identifier for months.

c) *Capture and control to reduce emissions to no more than the allowable limit.* If the permittee uses one or more capture systems and one or more control devices and demonstrate an average overall organic HAP control efficiency of at least 98 percent for each month to comply with §63.5120(a)(1), the permittee must follow one of the procedures in §63.5170(c)(2). Alternatively, the permittee may demonstrate compliance for an individual coil coating line by operating its capture system and control device and continuous parameter monitoring system according to the procedures in §63.5170(i). [§63.5170(c)]

   i) If the affected source uses one compliance procedure to limit organic HAP emissions to the level specified in §63.5120(a)(1) or (2) and has only always-controlled work stations, then the permittee must demonstrate compliance with the provisions of paragraph (f) of this section when emissions are controlled by one or more oxidizers. [§63.5170(c)(2)]

d) *Capture and control to achieve the emission rate limit.* If the permittee uses one or more capture systems and one or more control devices and limit the organic HAP emission rate to no more than 0.046 kg organic HAP emitted per liter of solids applied on a 12-month average as-applied basis, then the permittee must demonstrate compliance with the provisions in §63.5170(f). [§63.5170(d) and (d)(1)]

e) *Use of oxidation to demonstrate compliance.* If the permittee uses one or more oxidizers to control emissions from always controlled work stations, the permittee must follow the procedures in §63.5170(f)(1): [§63.5170(f)]

   i) *Continuous monitoring of capture system and control device operating parameters.* Demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters as specified in §63.5170(f)(1)(1)(i) through (xi): [§63.5170(f)(1)]

      (1) For each oxidizer used to comply with §63.5120(a), determine the oxidizer destruction or removal efficiency, DRE, using the procedure in §63.5160(d). [§63.5170(f)(1)(i)]

      (2) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with §63.5150(a)(3). [§63.5170(f)(1)(ii)]

      (3) Determine the capture system capture efficiency, CE, for each work station in accordance with §63.5160(e). [§63.5170(f)(1)(iii)]

(4) Whenever a work station is operated, continuously monitor the operating parameter established in accordance with §63.5150(a)(4). [§63.5170(f)(1)(iv)]
(5) Calculate the overall organic HAP control efficiency, R, achieved using Equation 7 of §63.5170. [§63.5170(f)(1)(v)]

$$R = 100 \frac{\sum_{A=1}^{w} \left[(DRE_K \, CE_A) \left(\sum_{i=1}^{p} M_{Ai} C_{vi} + \sum_{j=1}^{q} M_{Aj} \right) \right]}{\sum_{i=1}^{p} M_i C_{vi} + \sum_{j=1}^{q} M_j} \qquad (EQ.7)$$

Where:

R = overall organic HAP control efficiency, percent.
DRE_k = organic volatile matter destruction or removal efficiency of control device, k, percent.
CE_A = organic volatile matter capture efficiency of the capture system for work station, A, percent.
M_{ai} = mass of coating material, i, applied on work station, A, in a month, kg.
C_{vi} = volatile matter content of coating material, i, expressed as a weight fraction, kg/kg.
M_{Aj} = mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material (including H2O), j, applied on work station, A, in a month, kg.
M_i = mass of coating material, i, applied in a month, kg.
M_j = mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material (excluding H2O), j, applied in a month, kg.
w = number of always-controlled work stations in the facility.
p = number of different coating materials applied in a month.
q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(6) If demonstrating compliance with the organic HAP emission rate based on solids applied, measure the mass of each coating material applied on each work station during the month. [§63.5170(f)(1)(vi)]
(7) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month following the procedure in §63.5160(b). [§63.5170(f)(1)(vii)]
(8) If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month following the procedure in §63.5160(c). [§63.5170(f)(1)(viii)]
(9) Calculate the organic HAP emitted during the month, He, for each month: [§63.5170(f)(1)(ix)]
   (a) For each work station and its associated oxidizer, use Equation 8 of this section. [§63.5170(f)(1)(ix)(A)]

$$H_e = \sum_{A=1}^{w} \left[\left(1 - \left(DRE_K\, CE_A\right)\right) \left(\sum_{i=1}^{p} C_{hi}\, M_{Ai} + \sum_{j=1}^{q} C_{hij}\, M_{Aij} \right) \right] \qquad (Eq.\,8)$$

Where:

H_e = total monthly organic HAP emitted, kg.

DRE_k = organic volatile matter destruction or removal efficiency of control device, k, percent.

CE_A = organic volatile matter capture efficiency of the capture system for work station, A, percent.

C_{hi} = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

M_{Ai} = mass of coating material, i, applied on work station, A, in a month, kg.

C_{hij} = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

M_{Aij} = mass of solvent, thinner, reducer, diluent, or other non-solids-containing coating material, j, added to solids-containing coating material, i, applied on work station, A, in a month, kg.

w = number of always-controlled work stations in the facility.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

(b) For periods when the oxidizer has not operated within its established operating limit, the control device efficiency is determined to be zero. [§63.5170(f)(1)(ix)(B)]

(2) *Organic HAP emission rate based on solids applied for the 12-month compliance period, L_{ANNUAL}.* If demonstrating compliance with the organic HAP emission rate based on solids applied for the 12-month compliance period, calculate the organic HAP emission rate based on solids applied, L_{ANNUAL}, for the 12-month compliance period using Equation 6 of §63.5170. [§63.5170(f)(1)(x)]

$$L_{ANNUAL} = \frac{\sum_{y=1}^{12} H_e}{\sum_{y=1}^{12} \left[\sum_{i=1}^{p} C_{si}\, M_i \right]} \qquad (Eq.\,6)$$

Where:

L_{ANNUAL} = mass organic HAP emitted per volume of solids applied for the 12-month compliance period, kg/liter.

H_e = total monthly organic HAP emitted, kg.

C_{si} = solids content of coating material, i, expressed as liter of solids/kg of material.

M_i = mass of coating material, i, applied in a month, kg.

y = identifier for months.

p = number of different coating materials applied in a month.

(3) Compare actual performance to performance required by compliance option. The affected source is in compliance with §63.5120(a) if each oxidizer is operated such that the

average operating parameter value is greater than the operating parameter value established in §63.5150(a)(3) for each 3-hour period, and each capture system operating parameter average value is greater than or less than (as appropriate) the operating parameter value established in §63.5150(a)(4) for each 3-hour period; and the requirement in either paragraph (f)(1)(xi)(A) or (B) of §63.5170 is met. [§63.5170(f)(1)(xi)]

(a) The overall organic HAP control efficiency, R, is 98 percent or greater for each; or[§63.5170(f)(1)(xi)(A)]

(b) The organic HAP emission rate based on solids applied, L_{ANNUAL}, is 0.046 kg organic HAP per liter solids applied or less for the 12-month compliance period. [§63.5170(f)(1)(xi)(B)]

b) *Capture and control system compliance demonstration procedures using a CPMS for a coil coating line*. If the permittee uses an add-on control device, to demonstrate initial compliance for each capture system and each control device through performance tests and continuing compliance through continuous monitoring of capture system and control device operating parameters, the permittee must meet the requirements in §63.5170(i)(1) through (3). [§63.5170(i)]

i) Conduct an initial performance test to determine the control device destruction or removal efficiency, DRE, using the applicable test methods and procedures in §63.5160(d). [§63.5170(i)(1)]

ii) Determine the emission capture efficiency, CE, in accordance with §63.5160(e). [§63.5170(i)(2)]

iii) Whenever a coil coating line is operated, continuously monitor the operating parameters established according to §63.5150(a)(3) and (4) to ensure capture and control efficiency. [§63.5170(i)(3)]

Recordkeeping:

The permittee must maintain the records specified in §63.5190(a) and (b) in accordance with §63.10(b)(1): [§63.5190(a)]

1) Records of the coating lines on which the permittee used each compliance option and the time periods (beginning and ending dates and times) the permittee used each option. [§63.5190(a)(1)]

2) Records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with this subpart, including: [§63.5190(a)(2)]

a) Control device and capture system operating parameter data in accordance with §63.5150(a)(1), (3), and (4); [§63.5190(a)(2)(ii)]

b) Organic HAP content data for the purpose of demonstrating compliance in accordance with §63.5160(b); [§63.5190(a)(2)(iii)]

c) Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with §63.5160(c); [§63.5190(a)(2)(iv)]

d) Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with §63.5160(d), (e), and (f); and [§63.5190(a)(2)(v)]

e) Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with §63.5170(a), (b), and (d); [§63.5190(a)(2)(vi)]

3) Records specified in §63.10(b)(3); and [§63.5190(a)(3)]

Reporting:

Submit the reports specified below to EPA Region VII, 1120 Renner Boulevard, Lenexa, Kansas 66219, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102: [§63.5180(a)]

1) The permittee must submit a Notification of Compliance Status as specified in §63.9(h). The permittee must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in §63.5130. [§63.5180(d)]
2) The permittee must submit performance test reports as specified in §63.10(d)(2) if the permittee is using a control device to comply with the emission standards and the permittee has not obtained a waiver from the performance test requirement. [§63.5180(e)]
3) The permittee must submit start-up, shutdown, and malfunction reports as specified in §63.10(d)(5) if the permittee uses a control device to comply with this subpart. [§63.5180(f)]
   a) If the permittee's actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in §63.6(e)(3), the permittee must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy that will be submitted to the Administrator. [§63.5180(f)(1)]
   b) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in §63.5180(g). [§63.5180(f)(2)]
4) The permittee must submit semi-annual compliance reports containing the information specified in §63.5180 (g)(1) and (2). [§63.5180(g)]
   a) Compliance report dates. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in §63.5180(g)(1)(i) through (iv). [§63.5180(g)(1)(iv)]
   b) The semi-annual compliance report must contain the following information: [§63.5180(g)(2)]
      i) Company name and address. [§63.5180(g)(2)(i)]
      ii) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.5180(g)(2)(ii)]
      iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.5180(g)(2)](iii)]
      iv) Identification of the compliance option or options specified in Table 1 to §63.5170 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning dates the permittee used each option. [§63.5180(g)(2)(iv)]
      v) A statement that there were no deviations from the standards during the reporting period. [§63.5180(g)(2)(v)]
5) The permittee must submit, for each deviation occurring at an affected source where the permittee is not using CEMS to comply with the standards in this subpart, the semi-annual compliance report containing the information in §63.5180(g)(2)(i) through (iv) and the information in §63.5180(h)(1) through (3): [§63.5180(h)]

a) The total operating time of each affected source during the reporting period. [§63.5180(h)(1)]
b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken. [§63.5180(h)(2)]
c) Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable). [§63.5180(h)(3)]

Permit Condition (EU0010 and EU0020) -004

10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60 Subpart TT Standards of Performance for Metal Coil Surface Coating

Emission Limitation:

The permittee shall not cause to be discharged into the atmosphere more than: [40 CFR 60.462(a)]

1) 0.14 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or [40 CFR 60.462(a)(2)]
2) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or [40 CFR 60.462(a)(3)]
3) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency. [40 CFR 60.462(a)(4)]

Performance Test:

The permittee shall conduct a performance test for each calendar month for Coating Line 1 according to the procedures in 40 CFR 60.463(c)(2).

Monitoring:

1) Where compliance with the numerical limit specified in §60.462(a)(2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the permittee shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in §60.463. [40 CFR 60.464(a)]
2) Where compliance with the limit specified in §60.462(a)(4) is achieved through the intermittent use of emission control devices, the permittee shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in §60.463. [40 CFR 60.464(b)]
3) The permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of ±2.5 °C or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. [40 CFR 60.464(c)]

Recordkeeping:

1) The permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. [40 CFR 60.464(c)]

2) The permittee shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, the permittee shall maintain, at the source, daily records of the incinerator combustion temperature. [40 CFR 60.465(e)]

Reporting:

1) The permittee shall identify, record, and submit a written report to Missouri Department of Natural Resources Air Pollution Control Program and the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually. [40 CFR 60.465(c)]
2) The permittee shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.464(c). If no such periods occur, the permittee shall state this in the report. [40 CFR 60.465(d)]

EU0060 and EU0070 – Boilers		
Emission Unit	Description	2016 EIQ Reference #
EU0060	Natural gas-fired boiler used for generating steam– 13.39 MMBtu/hr. Installed in 1970	EP-19
EU0070	Line # 1 Waste Heat Boiler – Dual fired waste heat boiler used for generating steam for process and plant heating – 21 MMBTU/hr Installed in 1998	EP-29

Permit Condition (EU0060 and EU0070) - 001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Work Practice Standards:

1) As stated in §63.7500, the permittee must comply with the following applicable work practice standards: [Items 3 and 4 of Table 3 to Subpart DDDDD of Part 63]
   a) The permittee shall conduct a tune-up of the boilers annually as specified in §63.7540.
   b) The permittee must 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. A facility that operated under an energy management program developed according to the ENERGY STAR guidelines for energy management or compatible with ISO 50001 for at least one year between January 1, 2008 and the compliance date specified in §63.7495 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items listed below appropriate for the on-site technical hours listed in §63.7575:
      i) A visual inspection of the boiler or process heater system.

ii) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
iii) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
iv) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
v) A review of the facility's energy management program and provide recommendations for improvements consistent with the definition of energy management program, if identified.
vi) A list of cost-effective energy conservation measures that are within the facility's control.
vii) A list of the energy savings potential of the energy conservation measures identified.
viii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

2) At all times, The permittee must operate and maintain the boilers, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director 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 boilers. [§63.7500(a)(3)]

Continuous Compliance Demonstration with the Work Practice Standards:

1) The permittee must conduct a tune-up of the boilers annually as specified in §63.7540 (a)(10)(i) through (vi) (listed below).
   a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; [§63.7540(a)(10)(i)]
   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; [§63.7540(a)(10)(ii)]
   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) ; [§63.7540(a)(10)(iii)]
   d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications; [§63.7540(a)(10)(iv)]
   e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen 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; and [§63.7540(a)(10)(v)]
   f) Maintain on-site and submit, if requested by the Director, a report containing the information in §63.7540 (a)(10)(vi)(A) through (C) (listed below), [§63.7540(a)(10)(vi)]
      i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; [§63.7540(a)(10)(vi)(A)]

ii) A description of any corrective actions taken as a part of the tune-up; and [§63.7540(a)(10)(vi)(B)]
iii) The type and amount of fuel used over the 12 months prior to the tune-up, 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 used by each unit. [§63.7540(a)(10)(vi)(C)]

2) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [§63.7540(a)(13)]
3) The permittee must report each instance in which the permittee did not meet operating limit in Tables 3 to this subpart that applies to the permittee. These instances are deviations from the operating limits, respectively, in this subpart. These deviations must be reported according to the requirements in §63.7550. [§63.7540(b)]

Reporting:

1) *Notification*:
   a) If the permittee intends to use a fuel other than natural gas to fire the boiler(s) during a period of natural gas curtailment or supply interruption, as defined in §63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in §63.7575. The notification must include the information specified in §63.7545(f)(1) through (5) (listed below). [§63.7545(f)]
      i) Company name and address. [§63.7545(f)(1)]
      ii) Identification of the affected unit. [§63.7545(f)(2)]
      iii) Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began. [§63.7545(f)(3)]
      iv) Type of alternative fuel that the permittee intends to use. [§63.7545(f)(4)]
      v) Dates when the alternative fuel use is expected to begin and end. [§63.7545(f)(5)]
   b) If the permittee has switched fuels or made a physical change to the boiler(s) and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30 days of the switch/change. The notification must identify: [§63.7545(h)]
      i) The name of the owner or operator of the affected source, as defined in §63.7490, the location of the source, the boiler(s) that have switched fuels, were physically changed, and the date of the notice. [§63.7545(h)(1)]
      ii) The currently applicable subcategory under this subpart. [§63.7545(h)(2)]
      iii) The date upon which the fuel switch or physical change occurred. [§63.7545(h)(3)

2) *Reports:*
   a) The permittee must submit each report in the table below that applies to the permittee. [§63.7550(a) and Table 9 to Subpart DDDDD of 40 CFR Part 63]

The permittee Must Submit a	The Report Must Contain	The Permittee Must Submit the Report
1. Compliance report	a. Information required in §63.7550(c)(1) and (5); and	Annually according to the requirements in §63.7550(b).
	b. If there are no deviations the requirements for work practice standards for periods of startup and shutdown in Table 3 to this subpart that apply to the permittee, a statement that there were no deviations from work practice standards during the reporting period; and	
	c. If the permittee has deviation from a work practice standard for periods of startup and shutdown, during the reporting period, the report must contain the information in §63.7550(d).	

   b) Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report, according to §63.7550(h)(3), by the date in Table 9 to Subpart DDDDD of 40 CFR Part 63and according to the requirements in §63.7550(b)(1) through (4) (listed below). For units that are subject only to a requirement to conduct subsequent annual, tune-up according to §63.7540(a)(10), and not subject to emission limits or Table 4 operating limits, the permittee may submit only annual compliance report, as applicable, as specified in §63.7550(b)(1) through (4), instead of a semi-annual compliance report. [§63.7550(b)]
      i) The first compliance report must cover the period beginning on the compliance date that is specified for each boiler in §63.7495 and ending on December 31 within 1 year, after January 31, 2016 as specified in §63.7495. [§63.7550(b)(1)]
      ii) The first annual compliance report must be postmarked or submitted no later than January 31. [§63.7550(b)(2)]
      iii) Each annual compliance reports must cover the applicable 1-year periods from January 1 to December 31. [§63.7550(b)(3)]
      iv) Each annual compliance reports must be postmarked or submitted no later than January 31. [§63.7550(b)(4)]
      v) The permittee may submit the first and subsequent compliance reports according to the dates specified in Section V of this Permit instead of according to the dates in §63.7550(b)(1) through (4) (listed above). [§63.7550(b)(5)]
   c) A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule. [§63.7550(c)]
      i) For the requirements of a tune up the permittee must submit a compliance report with the information in §63.7550(c)(5)(i) through (iii), §63.7550 (xiv) and (xvii) (listed below). [§63.7550(c)(1)]
      ii) Company and Facility name and address. [§63.7550(c)(5)(i)]
      iii) Process unit information. [§63.7550(c)(5)(ii)]
      iv) Date of report and beginning and ending dates of the reporting period. [§63.7550(c)(5)(iii)]

v) Include the date of the most recent tune-up for each unit subject to only the requirement to an annual tune-up according to §63.7540(a)(10). Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown. [§63.7550(c)(5)(xiv)]

vi) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.7550(c)(5)(xiv)]

d) For each deviation from the work practice standards for periods of startup and shutdown, the compliance report must additionally contain the information required in §63.7550(d)(1) and (2) (listed below). [§63.7550(d)]

i) A description of the deviation and which work practice standard from which the permittee deviated. [§63.7550(d)(1)]

ii) Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken. [§63.7550(d)(2)]

Recordkeeping:

1) The permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]
2) If the permittee operates a unit in the unit designed to burn gas 1 subcategory that is subject to this subpart, and the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under this part, other gas 1 fuel, or gaseous fuel subject to another subpart of this part or part 60, 61, or 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. [§63.7555(h)]
3) The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§63.7560(a)]
4) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.7560(b)]
5) The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records off site for the remaining 3 years. [§63.7560(c)]

Permit Condition (EU0070) - 002

10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No. 98-08-050
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[1]

Operational Limitation:
The maximum throughput of natural gas in this emission unit shall not exceed 82 million cubic feet per consecutive twelve-month period.

Monitoring:
The permittee shall install and operate a meter through which natural gas is introduced to this emission unit. The daily usage of natural gas shall be monitored. [Construction Permit 98-08-050]

Recordkeeping:
1) The permittee shall maintain a record of the daily usage of natural gas.
2) Records of daily boiler operation shall be kept to calculate apportioned fuel usage.

Reporting:
1) The permittee shall provide a written report to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than twenty (20) days after the permittee determined that the emission unit exceeded the emission limitation.
2) The permittee shall also report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification as required by Section V of this permit.

[1] Since EU0070 (Line #1 Waste Heat Boiler) only fires natural gas, compliance with Subpart Dc only requires monthly fuel consumption records, which must be maintained for a minimum of two years. To be in compliance with the Subpart Dc and Title V record retention period, the source will keep the records for 5 years as required by 10-6.065(6)C)1.C.

EU0090 -Maintenance Parts Cleaner			
Emission Unit	Description	Manufacturer/ Model #	2016 EIQ Reference #
EU0090	Cold Cleaner – 85 Gallon	Graymills	Not Available

Permit Condition (EU0090 and EU0100) - 001

10 CSR 10-5.300 Control of Emissions from Solvent Cleaning

Emission Limitation:

1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)). [10 CSR 10-5.300(3)(A)1.A]
2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements of subparagraph (3)(A)1.A and (3)(A)1.B of 10 CSR 10-5.300. The director and the U.S Environmental Protection Agency (EPA) must approve the alternative method. [10 CSR 10-5.300(3)(A)1.D]

Operational Limitation/Equipment Specification:

The permittee shall comply with the following operational limitations and equipment specifications unless an exemption under 10 CSR 10-5.300(1)(D) applies:

1) Equipment specifications:
   a) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir, which will limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [10 CSR 10-5.300(3)(A)1.C]
   b) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the Director and the EPA. [10 CSR 10-5.300(3)(A)1.D]
   c) When one (1) or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system). [10 CSR 10-5.300(3)(A)1.E]
      i) The solvent vapor pressure is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F) [10 CSR 10-5.300(3)(A)1.E(I)]
      ii) The solvent is agitated. [10 CSR 10-5.300(3)(A)1.E(II)]
      iii) The solvent is heated. [10 CSR 10-5.300(3)(A)1.E(III)]
   d) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [10 CSR 10-5.300(3)(A)1.F]
   e) If an internal drainage facility as in 10 CSR 10-5.300(3)(A)1.F cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [10 CSR 10-5.300(3)(A)1.G]
   f) Solvent sprays shall be a solid fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [10 CSR 10-5.300(3)(A)1.H]

g) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [10 CSR 10-5.300(3)(A)1.I]
h) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must use one (1) of the following control devices: [10 CSR 10-5.300(3)(A)1.J]
   i) A freeboard ratio of at least 0.75 [10 CSR 10-5.300(3)(A)1.J(I)]
   ii) Water cover (solvent must be insoluble in and heavier than water) [10 CSR 10-5.300(3)(A)1.J(II)]
   iii) Other control system that has a mass balance demonstrated overall VOC emission reduction efficiency of at least sixty-five percent (65%) and is approved by the Director and EPA prior to use. [10 CSR 10-5.300(3)(A)1.J(III)]

2) Operating procedures:
   a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [10 CSR 10-5.300(3)(B)1.A]
   b) Cleaned parts shall be drained in the free board area for at least fifteen (15) seconds, or until dripping stops, whichever is longer. [10 CSR 10-5.300(3)(B)1.B]
   c) Whenever a cold cleaner fails to perform within the operating parameters established by 10 CSR 10-5.300, the unit shall be shut down and shall remain shut down until operation is restarted to meet 10 CSR 10-5.300's operating requirements. [10 CSR 10-5.300(3)(B)1.C]
   d) Solvent leaks shall be repaired immediately, or the cold cleaner shall be shut down until the leaks are repaired. [10 CSR 10-5.300(3)(B)1.D]
   e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the 10 CSR 10-5.300 or an equivalent method approved by the director and EPA. [10 CSR 10-5.300(3)(B)1.E]
   f) Waste solvent shall be stored in closed containers only. [10 CSR 10-5.300(3)(B)1.F]
3) Operator and Supervisor Training:
   a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in 10 CSR 10-5.300 for the permittee's particular solvent metal cleaning process. [10 CSR 10-5.300(3)(C)1]
   b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator. [10 CSR 10-5.300(3)(C)2]
   c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months. [10 CSR 10-5.300(3)(C)3]

Monitoring/ Recordkeeping:

1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment G): [10 CSR 10-5.300(4)(B)]
   a) Name and address of the solvent supplier. [10 CSR 10-5.300(4)(B)1]
   b) Date of purchase. [10 CSR 10-5.300(4)(B)2]
   c) Type of solvent purchased. [10 CSR 10-5.300(4)(B)3]
   d) Vapor pressure of solvent in mm Hg at 20°C or 68°F. [10 CSR 10-5.300(4)(B)4]
2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment E). The record also shall include maintenance and repair logs that occurred on the degreaser and any associated control equipment

(Attachment F). These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule. [10 CSR 10-5.300(4)(A]

3) The permittee shall keep records of solvent metal cleaning training as required by 10 CSR 10-5.300(3)(C) (Attachment H).
4) All records shall be retained for five years and be available to the director upon request. [10 CSR 10-5.300(4)(E)]

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program, Compliances and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

EU0110 - Emergency Generators	
Emission Unit	Description
EU0110	Two (2) Pipeline Natural Gas-fired Emergency generators. Generator 1: 0.316 MMBtu/hr (124 horsepower (HP)) Generator 2: 0.561 MMBtu/hr (203 HP)

Permit Condition EP5-001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Emission Limitation:

As stated in §6602 the permittee must comply with the following requirements for existing compression ignition stationary RICE ≤500 HP: [Table 2c to Subpart ZZZZ of Part 63]

For each	The permittee must meet the following requirement, except during periods of startup	During periods of startup the permittee must
Emergency stationary SI RICE [1]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[2] b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [3]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

[1] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of this subpart, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

[2] The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2c of this subpart.

[3] The permittee can petition the Director pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

Monitoring, Operation and Maintenance Requirements:

1) The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
2) The permittee must install a non-resettable hour meter if one is not already installed. [§63.6625(f)]

3) The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to Subpart ZZZZ of Part 63 apply. [§63.6625(h)]
4) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c to this subpart (see Emission Limitation/Standards of this permit condition). The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil before continuing to use the engine. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [§63.6625(i)]

Compliance Requirements:

1) The permittee must be in compliance with the emission limitations and operating limitations in Subpart ZZZZ of 40 CFR Part 63 that apply to the permittee at all times. [40 CFR §63.6605(a)]
2) The permittee must monitor and collect data according to §63.6635.
   a) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [40 CFR §63.6635(b)]
   b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [§63.6635(c)]
3) The permittee must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 2c to Subpart ZZZZ of 40 CFR Part 63 that apply to the permittee according to methods specified below (from Table 6 to Subpart ZZZZ of 40 CFR Part 63). [40 CFR §63.6640(a)]

For Each…	Complying with the requirements to …	The permittee must demonstrate continuous compliance by …
Existing stationary SI RICE not subject to any numerical emission limitations	Work or Management practices	i Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

4) The permittee must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1), (f)(1)(i), (f)(2), (f)(2)(i) and(f)(4)(ii) of 40 CFR §63.6640. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of 40 CFR §63.6640, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of §63.6640, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.
[40 CFR §63.6640(f)]
   a) There is no time limit on the use of emergency stationary RICE in emergency situations.
   [40 CFR §63.6640(f)(1)]
   b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) of §40 CFR 63.6640 for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(4) of 40 CFR §63.6640 counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
   [§63.6640(f)(2)]
      i) The emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
      [40 CFR §63.6640(f)(2)(i)]
   c) The emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of 40 CFR §63.6640. Except as provided in paragraph (f)(4)(ii) of 40 CFR §63.6640, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
      i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
      [40 CFR §63.6640(f)(4)(ii)]

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [40 CFR §63.6640(f)(4)(ii)(A)]
(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [40 CFR §63.6640(f)(4)(ii)(B)]
(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [40 CFR §63.6640(f)(4)(ii)(C)]
(D) The power is provided only to the facility itself or to support the local transmission and distribution system. [40 CFR §63.6640(f)(4)(ii)(D)]
(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. [40 CFR §63.6640(f)(4)(ii)(E)]

Recordkeeping:

1) The permittee must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of §63.6655. [40 CFR §63.6655(a)]
   a) A copy of each notification and report that the permittee submitted to comply with Subpart ZZZZ of 40 CFR Part 63, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR §63.10(b)(2)(xiv). [40 CFR §63.6655(a)(1)]
   b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [40 CFR §63.6655(a)(2)]
   c) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.6605(b). [40 CFR §63.6655(a)(5)]
2) The permittee must keep the records required in Table 6 of Subpart ZZZZ of 40 CFR Part 63 to show continuous compliance with each emission or operating limitation that applies to the permittee. [40 CFR §63.6655(d)]
3) The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1). [40 CFR §63.6660(a)]
4) As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR §63.6660(b)]
5) The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1). [40 CFR §63.6660(c)]

Reporting:

1) The permittee must report each instance in which the permittee did not meet each emission limitation or operating limitation in Table 2c to Subpart ZZZZ of 40 CFR Part 63 that applies. These instances are deviations from the emission and operating limitations in Subpart ZZZZ of 40 CFR Part 63. These deviations must be reported according to the requirements in 40 CFR §63.6650. [40 CFR §63.6640(b)]
2) The permittee must also report each instance in which the permittee did not meet the applicable requirements in Table 8 to Subpart ZZZZ of 40 CFR Part 63 — Applicability of General Provisions to Subpart ZZZZ. [40 CFR §63.6640(e)]

3) *Reporting requirements* [40 CFR §63.6650]
   a) The permittee must submit each report in Table 7 of Subpart ZZZZ of 40 CFR Part 63 that applies. [40 CFR §63.6650(a)]
   b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the date in Table 7 of Subpart ZZZZ of 40 CFR Part 63 and according to the requirements in paragraphs (b)(5), (b)(8) and (b)(9) of §63.6650. [40 CFR §63.6650(b)]
      i) The permittee shall submit compliance reports according to the dates specified in 10 CSR 10-6.065(6)(C)1.C, General Record Keeping and Reporting Requirements and 10 CSR 10-6.065(6)(C)3, Compliance Requirements, of Section V of this permit instead of according to the dates specified in in paragraphs (b)(1) through (b)(4) of 40 CFR §63.6650. [40 CFR §63.6650(b)(5)]
      ii) For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31. [40 CFR §63.6650(b)(8)]
      iii) For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31. [40 CFR §63.6650(b)(9)]
   c) The Compliance report must contain the information in paragraphs (c)(1) through (6) of 40 CFR §63.6650. [40 CFR §63.6650(c)]
      i) Company name and address. [40 CFR §63.6650(c)(1)]
      ii) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [40 CFR §63.6650(c)(2)]
      iii) Date of report and beginning and ending dates of the reporting period. [40 CFR §63.6650(c)(3)]
      iv) If the permittee had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.6605(b), including actions taken to correct a malfunction. [40 CFR §63.6650(c)(4)]
      v) If there are no deviations from any emission or operating limitations that apply, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]
   d) For each deviation from an emission or operating limitation that occurs for the stationary RICE where the permittee is not using a CMS to comply with the emission or operating limitations in Subpart ZZZZ of 40 CFR Part 63, the Compliance report must contain the information in paragraphs (c)(1) through (4) of 40 CFR §63.6650 and the information in paragraphs (d)(1) and (2) of 40 CFR §63.6650. [40 CFR §63.6650(d)]
      i) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [40 CFR §63.6650(d)(1)]
      ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [40 CFR §63.6650(c)(2)]
   e) The permittee must report all deviations as defined in Subpart ZZZZ of 40 CFR Part 63 in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If the permittee submits a Compliance report pursuant to Table 7 of Subpart ZZZZ of 40 CFR Part 63 along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all

required information concerning deviations from any emission or operating limitation in Subpart ZZZZ of 40 CFR Part 63, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the permit authority.
[40 CFR §63.6650(f)]

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 and
St. Louis City Ordinance 68657 §16 Open Burning Restrictions

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

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) 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 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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
2) Exception:

a) Existing sources[2] in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
b) 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 40%.

Monitoring:

1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2) The permittee must maintain the following monitoring schedule:
   a) Observations must be made once per month. If a violation is noted, then
   b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

1) The permittee shall maintain records of all observation results using Attachment G (or its equivalent), 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;
   d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions.
2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment D).

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.

[2] Existing source in the St. Louis metropolitan area: - any equipment, machine, device, article, contrivance or installation in being, installed or in construction in the St. Louis metropolitan area on March 24, 1967, except that if the source is altered, repaired, or rebuilt at a cost of fifty percent (50%) or more of its replacement cost exclusive of routine maintenance, it shall no longer be existing, but shall be considered new as defined in this regulation..

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.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited
(Rescinded on September 30, 2018, Contained in State Implementation Plan)

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
(Rescinded on February 11, 1979, Contained in State Implementation Plan)

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

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

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, 10 CSR 10-6.065(6)(E)3.C 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. 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 Anu Singh, Director of EHS. 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 A – Surface Coating Operations Compliance Demonstration

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*
Compliance Demonstration - Sample Record Form

Daily Record of Substances Used for Coating, Thinning, Purging, and Equipment Cleaning Record

Date	Substance	CAS	Gallons Used Daily	Lbs VOC/gal (less water & non-VOC organic compounds)	Purpose (used for)

Attachment B - Surface Coating Operations Compliance Demonstration

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations* - Compliance Demonstration - Sample Record Form

Date	Coating Ingredient	Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
		Enter These Values from Coating Formulation Data				Coating Volume Fraction (minus water & non-VOC organic compounds)	Daily Coating Gallons Used (minus water & non-voc organic compounds)	lbs VOC per Gallon (minus water & non-voc organic compounds)	Volume-Weighted Daily lbs of VOC
		Daily Coating Gallons Used	lbs VOC per Gallon of Coating	Water Volume Fraction of Coating	Non-VOC Organic Compounds Volume Fraction of Coating				
						Sum of Column F (gallons):			
								Sum of Column H (lbs)	
[1]Daily Volume-Weighted Average ($DAVG_{vw}$) = _____ lbs of VOC/gal coating (less water & non-VOC organic Compounds)									

Note 1: Daily Volume-Weighted Average ($DAVG_{vw}$) = [Sum of Column H ÷ Sum of Column F]

Instructions:

1. Enter values for Columns A, B, C and D from coating formulation data.
2. Calculate volume fraction of coating (minus water & non-VOC organic compounds): [Column E = 1 – (Column C + Column D)]
3. Calculate the daily coating used (minus water & non-voc organic compounds) in gallons in Column F by multiplying daily coating used in gallons [Column A] by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column F = [Column A x Column E]
4. Calculate lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient in Column G by dividing lbs of VOC per gallon of coating (Column A) by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column G = [Column B ÷ Column E]
5. Calculate the volume weighted daily lbs of VOC in Column H per coating ingredient by multiplying the daily coating gallons used (minus water & non-VOC organic compounds (Column F) by lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient (Column G): Column H = [Column F x Column G]

Calculate Daily Volume-Weighted Average (lbs of VOC per gal coating (less water & non-VOC organic compounds)) by dividing the daily sum of Column H by daily sum of Column F.

Attachment C - Opacity Emission Observations

10 CSR 10-6.220 Compliance Demonstration

Method 22 Opacity Emission Observations			
Date	Method 22 Test Observer	Visible Emissions (yes/no)	If Visible emissions, was a method 9 done? (yes/no)

Attachment D - Method 9 Opacity Emissions Observation

10 CSR 10-6.220 Compliance Demonstration

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

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

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

Readings ranged from _____ to _____ % opacity.
Was the emission unit in compliance at the time of evaluation? _____ _____ _____
YES NO Signature of Observer

Attachment E - Solvent Containing Waste Transfer Log

10 CSR 10-5.300 Compliance Demonstration

Date	Amount of Total Solvent Transferred (gallons)	Amount of Solvent Transferred to a Contract Reclamation Service (gallons)	Amount of Solvent Transferred to a Disposal Facility (gallons)	Amount of Solvent Distilled on the Premises (gallons)

Attachment F - Inspection/Maintenance/Repair/Malfunction Log

10 CSR 10-5.300 Compliance Demonstration

Date	Equipment/Emission Unit	Activities Performed

Attachment G - Purchase Records for Cold Cleaning Solvent

10 CSR 10-5.300 Compliance Demonstration

Date	Solvent Supplier Name	Solvent Supplier Address	Type of Solvent	Solvent Volatility in mmHg at 20°C (68°F)

Attachment H - Employee Solvent Metal Cleaning Training Log

10 CSR 10-5.300 Compliance Demonstration

Date	Title of Solvent Metal Cleaning Training Course	Instructor

STATEMENT OF BASIS

Installation Description

Precoat Metals operates two continuous metal coil surface coating lines. Coil line 1 consists of an aqueous pretreatment section (cleaning, rinsing, chemical treatment), a prime coating section (coater and oven), a printer coater and ultraviolet curing station and a finish coating section (coater, oven and combined oxidizer for the prime and finish ovens and dual fired waste heat boiler). Coil line 2 consists of an aqueous pretreatment section (cleaning, scrubbing, rinsing, and chemical treatment), a prime coating section (coater, oven, and oxidizer) and a finish coating section (coater, oven, oxidizer, and combined waste heat boiler). The installation has six bulk solvent storage tanks, two gas-fired boilers, and a variety of maintenance activities including grinding, degreasing, and sandblasting.

Precoat Metals is located in the City of St. Louis, a nonattainment area for the 8-hour ozone standard and the PM2.5 standard and an attainment area for all other criteria pollutants. Precoat Metals is a major source of hazardous air pollutants and volatile organic compounds.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, tons per year

Pollutants	Potential to Emit[1]	Reported Actual Emissions				
		2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM_{10})	5.19	0.60	0.61	0.72	0.072	0.62
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)	5.15	0.59	0.61	0.72	0.072	0.61
Sulfur Oxides (SOx)	0.41	0.04	0.04	0.05	0.05	0.04
Nitrogen Oxides (NOx)	68.33	7.90	8.13	9.58	9.58	8.21
Volatile Organic Compounds (VOC)[2]	181.24	25.73	29.60	31.41	40.03	43.17
Carbon Monoxide (CO)	57.40	6.63	6.83	8.04	8.04	6.90
Hazardous Air Pollutants (HAP's)[3]	35.98	—	—	—	—	—

Note:

1. Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.
2. VOC potential emissions for Coating Lines 1 and 2 are based on the St. Louis City Air Pollution Control Program Construction Permit #95-04-047F limit of 164.4 tons per year
3. Although the table includes no values for Actual Emissions of Hazardous Air Pollutants, the installation did emit Hazardous Air Pollutants during the years 2012-2016. The HAPs emissions were reported as VOCs on Form 2T pages of the Emission Inventory Questionnaires in the applicable years.

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 February 2, 2016;
2) P70 Operating Permit OP2011-037, Issued August 12, 2011;
3) 2016 Emissions Inventory Questionnaire, received April 27, 2017;
4) St. Louis City Construction Permit #95-04-047F. Line One Coating Modifications;
5) St. Louis City Construction Permit #95-06-072. Bulk Loading of Tote Tanks;
6) St. Louis City Construction Permit #98-08-050. Waste Heat Boiler; and
7) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.
None

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

1) 10 CSR 10-6.405, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*
According to 10 CSR 10-6.405(1)(C), an installation is exempt from this rule if all of the installation's applicable units arc fueled only by landfill gas, propane, natural gas. Fuel Oils Nos. 2 through 6 (with less than one and two-tenths percent (1.2 %) sulfur), or other gases (with hydrogen sulfide levels less than or equal to four (4) parts per million volume as measured using ASTM D4084, or equivalent and mercury concentrations less than forty (40) micrograms per cubic meter as measured using ASTM D5954, or ASTM D6350, or equivalent or any combination of these fuels.

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

2) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
10 CSR 10.6.261, *Control of Sulfur Dioxide Emissions.*
These rules are not applicable to the installation. The boilers combust only natural gas. Thus, they are exempt from these regulations according to 10 CSR 10-6.260(1)(A)2. and 10 CSR 10-6.261(1)(A).

Construction Permit History
The following revisions were made to construction permits for this installation:
1) Construction Permit #95-04-047F
Section II(A): The limitations described in the permit for different overall control efficiencies have been narrowed down to the situation that has been demonstrated during a performance test. The

performance test for Line #1 was conducted in December, 1997. The overall control efficiency demonstrated was 96%. Since this is only slightly higher than 95.7%, the limit of 10.1 million pounds on paint and reduction solvent usage is applicable. The lower limit for overall control efficiency is 95.7% for Coating Line #1 as per this construction permit.

Section III(A)(i)-(vi): A performance test has been conducted for Coating Line #1 that satisfies all of these conditions. These conditions, therefore, are not included in the operating permit.

Section IV(G): The length of time records are required to be kept has been modified to five (5) years from three (3) years.

A requirement for monitoring of combustion chamber temperature of the thermal oxidizers was included in Permit Condition (EU0010, EU0020, EU0040 and EU0050) - 001. The installation relies upon these control devices to demonstrate compliance with the conditions of the permit, as well as other applicable requirements. It is appropriate to monitor the operation of the control devices to ensure that the ongoing control is equivalent or better than that demonstrated during performance tests.

2) Construction Permit #95-06-072:
The Bulk Unloading into Tote Tanks (EP26) identified as EU0080 in OP2011-037 are no longer in operation. As such, any condition and all references to EP26 in Construction Permit #95-06-072 are not included in this renewal permit P70 Operating Permit.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations*

1) 40 CFR Part 60 Subpart TT - *Standards of Performance for Metal Coil Surface Coating*
Coating Line #1 was modified in 1996/1997 in accordance with St. Louis City Construction Permit #95-04-047F. 40 CFR 60 Subpart TT Standards of Performance for Metal Coil Surface Coating applies to the prime and finish coating operations of this line. The installation is required to conduct a performance test within sixty (60) days of reaching normal production levels. A performance test was conducted in December of 1997. The NSPS contains a control requirement of 90% as a compliance option while using the thermal oxidizer at all times. During the test, an overall control efficiency of 96% was demonstrated. Currently, the oxidizer is used at all times during operation of the coating line and ovens. Therefore, this coating line meets this performance standard within the conditions of the performance test.

2) 40 CFR 60 Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*
This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

Under Subparts Db and Dc, a steam generating unit is defined as any device which combusts any fuel to produce steam, heat water, or heat any heat transfer medium. Part 60.41b and Part 60.41c define a heat transfer medium as any material used for transferring heat from one point to another point.

Therefore, Line #1 Waste Heat Boiler (EU0070) rated at greater than 10 MMBtu/hr but less than 100 MMBtu/hr and constructed after the applicability date of this subpart, is subject to this subpart. Under this Subpart, there are no opacity requirements for boilers with heat inputs less than 30 million Btu and there are no particulate or sulfur dioxide standards for these units. The only substantive requirement is that the permittee keep records of the amounts of fuel combusted monthly in these units.

3) 40 CFR 60 Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.*
This subpart is applicable to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons who construct, reconstruct, or modify an engine after July 11, 2005. A compression ignition is a type of stationary internal combustion engine that is not a spark ignition engine.

This subpart is not applicable because the stationary internal combustion engines are spark ignition engines not compression ignition engines.

4) 40 CFR 60 Subpart JJJJ - *Standards of Performance for Spark Ignition Internal Combustion Engines,*
This subpart is applicable to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) who construct, reconstruct, or modify an engine after July 12, 2006. A stationary internal combustion engine is any internal combustion engine, except combustion turbines, that converts heat energy into mechanical work and is not mobile. Stationary ICE include reciprocating ICE, rotary ICE, and other ICE, except combustion turbines.

The installation operates two (2) natural gas fired spark ignition internal combustion engines (emergency generators). As stated in 40 CFR §60.4230(a)(4)(iv) of Subpart JJJJ, the provisions of this subpart are applicable to owners and operators of emergency engines constructed on or after January 1, 2009. Since the emergency generator were constructed before the applicability date of this subpart, the provisions of this subpart are not applicable to the installation..

Maximum Achievable Control Technology (MACT) Applicability

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

1) 40 CFR Part 63, Subpart SSSS - *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Coil*
Precoat Metals is subject to this MACT. Line 1 will comply with §63.5120(a)(2) and Line 2 can comply with either §63.5120(a)(1) or (a)(2).

§63.5160 – Performance Testing:

Citation	Requirement	Results
§63.5160(b)(4)	Organic HAP Content	Verified via formulation data. Obtained MSDSs and specifications sheets from manufacturer coating applied at the plant
§63.5160(c)	Solids Content	Verified via formulation data. Obtained MSDSs and specifications sheets from manufacturer coating applied at the plant

§63.5160(d)	Capture & Control Efficiency	Coating Line 1: Test performed on 4/15/2005. Utilized temporary total enclosure (TTE) and followed USEPA Method 204. Three one-hour USEPA Method 25A tests performed simultaneously at the Prime Coater Fugitife Exhaust, Finish Coater Fugitive Exhaust, and Oxidizer Outlet. Capture efficiency for the prime coater system averaged 99.87%; 97.83% for the finish coater system; and, a weighted average overall control efficiency of 98.78%. With the average calculated destruction efficiency of 98.94%, the overall control efficiency for the prime and finish work station was 98.78% and 96.82 % respectively. The overall weighted average control efficiency was 97.73%. The average combustion temperature for the three, one hour runs was 1407°F.
		Coating Line 2: Test performed on 4/15/2005. Utilized temporary total enclosure (TTE) and followed USEPA Method 204. Three one-hour USEPA Method 25A tests performed simultaneously at the Prime Oxidizer Inlet, Finish Oxidizer Inlet, and Common Oxidizer Outlet for destruction efficiency. Two three-hour tests were conducted at the Prime Coater Enclosure exhaust and Finish Coater Enclosure exhaust and the Prime Coater Oxidizer Inlet for capture efficiency determination. Capture and destruction efficiency for the prime were 99.68% and 99.51% respectively, yielding a total control efficiency of 99.19%. Capture and destruction efficiency for the finish were 99.42% and 99.51% respectively, yielding a total control efficiency of 98.93%. The overall weighted average control efficiency was 99.05%, The average combustion chamber temperature for the three, one hour destruction efficiency tests for the prime and finish oxidizer respectively was 1388°F and 1387°F respectively.

1) 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.*
The Subpart ZZZZ standards are applicable to Reciprocating Internal Combustion Engines (RICE) located at both major and/or area sources of hazardous air pollutants (HAPs) and RICE with a site rating of less than or equal to 500 brake horsepower (bhp). In addition, the standards for existing non-emergency compression ignition (CI) engines with a site rating of greater than 500 bhp at major sources and revised provisions related to Startup, Shutdown, and Malfunction (SSM) events for engines previously regulated under the rule. Finally, emergency RICE with a rating greater than 500 bhp located at a major source are subject to this rule, but with limited requirements.

The installation operates natural gas-fired emergency generators (EU0110) whose operations are limited to emergency situations. The engines were installed prior to June 12, 2006 and according to §63.6590(a)(1)(ii) of this subpart, stationary RICE located at a major source of HAP emissions is existing if commenced construction or reconstruction before June 12, 2006. The engines are subject to the Work Practice Standards, Maintenance Plan, Monitoring, and Recordkeeping requirements. Therefore, this subpart applies.

2) 40 CFR Part 63, Subpart T - *National Emission Standards for Halogenated Solvent Cleaning*
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride,

perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent are not covered under the provisions of this subpart.

The permittee has a total of two parts washers manufactured by Safety-Kleen in sizes ranging from 30 gallons to 40 gallons. These units do not use halogenated solvents as defined in 40 CFR 63.460, therefore the parts washers are not subject to the MACT standards for halogenated solvent cleaning.

3) 40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.*
The Subpart applies to a facility that owns or operates a industrial boilers, institutional boilers, commercial boilers, and process heaters that is a major source, or is located at a major source, or is part of a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water.
   a) This regulation applies to the following emission units which are natural gas fired only and is included in this permit under Permit Condition (EU0060 and EU0070) - 001:

Equipment Description	Rated Heat Input Capacity (MMBtu/hr)	Installation Date
Line #1 Waste Heat Boiler	21	1982
Boiler – Natural Gas-fired	13.39	1998

   b) The following natural gas fired ovens are part of the painting operation and thus are part of the affected source under the Surface Coating of Metal Coil MACT (40 CFR Part 63, Subpart SSSS). According to §63.7491(h) of 40 CFR Part 63, Subpart DDDDD, any boiler or process heater that is part of the affected source subject to another subpart of 40 CFR Part 63 are not subject to Subpart DDDDD. Therefore the ovens are not subject to this subpart.
      - Line 1 curing ovens and process heaters; and
      - Line 2 curing ovens and process heaters

4) 40 CFR Part 63 Subpart JJJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*
This regulation does not apply to the boilers and process heaters at this facility because it is a major source of hazardous air pollutants (HAPS).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos.*
The installation is not subject to any NESHAP standard with the exception of Subpart M - National Emission Standard for Asbestos. The installation is potentially subject to Subpart M. If the installation conducts any demolition or renovation projects to a building(s) containing asbestos, they must determine applicability with the following NESHAP regulations:
- Demolition and Renovation - 40 CFR 61.145

- Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying - 40 CFR 61.150

Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*
The CAM rule applies to each pollutant specific emission unit that:
a) Is subject to an emission limitation or standard, and
b) Uses a control device to achieve compliance, and
c) Has pre-control emissions that exceed or are equivalent to the major source threshold.
Coating Line #1 and Coating Line #2 utilize control devices to limit VOC emissions and have potential to emit greater than the major source threshold (applicability item c). The two coating lines are the only emission units that have pre-control VOC emissions above the major source threshold. Since these units are subject to 40 CFR Part 63, Subpart SSSS standards; and units that are subject to 111 or 112 standards promulgated after 11/15/90 are excluded from CAM, therefore the coating lines are not subject to CAM.

Greenhouse Gas Emissions
This installation is not a major source for greenhouse gases. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO_2e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2e emissions were not included within this permit.

Other Regulatory Determinations
1) 10 CSR 10-6.400, *Restriction of Emission Of Particulate Matter From Industrial Processes.*
The coating lines do not generate any appreciable particulate emissions due to the nature of the coating process. Paint is applied to the metal by a roller that applies the coating at a uniform thickness. There is no spraying or atomization involved. The prime and finish cure ovens burn natural gas only. This is the only source of particulate emissions. In accordance with MDNR guidance, the process weight for each line includes only the maximum amount of coating material used in an hour.

The following table presents the data and calculations used to demonstrate compliance with 10 CSR 10-6.400. Where available, the maximum hourly design rate for each emission unit was taken from the 2016 EIQ.

Also, the following formula from 10 CSR 10-6.400 is used to calculate the PM allowable limit:
$E = 4.10P^{0.67}$ for process weight rates up to 30 tons (60,000 lbs) per hour, and
Where: E = rate of emission in lb/hr; and
P = process weight rate in tons/hr (maximum hourly design rate)

Process Weight for Coating Line #1	= 0.306 tons per hour
Process Weight for Printer Coater	= 0.05 tons per hour
Process Weight for Coating Line #2	= 0.5721 tons per hour

Emission Unit	Maximum Hourly Design Rate (ton/hr)	Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)	In Compliance (yes/no)
EU0010 & EU0020	0.306	0.101	1.85	Yes
EU0030	0.05	0.03	0.55	Yes
EU0040 & EU0050	0.5721	0.11	2.82	Yes

The coating lines as shown above in the table potentially emit less than 0.5 lbs of PM per hour and are exempt from the requirements of this rule per 10 CSR 10-6.400(1)(B)12.

2) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants.*
10 CSR 10-6.220 applies to all particulate emitting sources listed in the emission units with limitations except the units listed in the table, below, and emission units listed in emission units without limitations, i.e., equipment that does not have unit specific limitations at the time of permit issuance.

Description	10 CSR 10-6.220 Applicability
Facility Wide Internal Combustion Engines (Natural Gas)	10 CSR 10-6.220(1)(A) exempts stationary internal combustion engines operated in the St. Louis metropolitan area.
Facility-Wide Boilers and Miscellaneous Combustion Equipment (During Natural Gas Firing)	These sources are subject to this regulation. However, emission units combusting natural gas are assumed to be in compliance with this regulation without any monitoring.

At the time of issuance of this permit, the installation had already completed its weekly and bi-weekly observations, as required by the initial operating permit OP2011-037. The installation is currently conducting monthly observations as required by the previously mentioned permit.

The installation had performed the initial weekly/biweekly observations and has been performing monthly monitoring; therefore it will be required to continue visible emissions observation on a monthly basis unless a violation occurs. If a violation occurs, the monitoring frequency will revert to a weekly schedule. This tiered monitoring frequency of visible/no visible emissions observations using Method 22 like procedures is considered sufficient.

3) 10 CSR 10-5.455, *Control of Emission from Solvent Cleanup Operations.*
VOC containing solvent is used to cleanup the coil coating equipment in the prime coating rooms of both lines, the finish coating rooms of both lines and the printer coating room. VOC emissions from the cleanup operations are controlled by the thermal oxidizers. The combined cleanup and solvent wipe activities result in less than 500 pounds per day of VOC emissions. This rule, therefore, is not applicable to the installation.

4) 10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions From Existing Major Sources.* This rule applies to any installation in the counties of St. Charles, St. Louis, Franklin, or Jefferson or the City of St. Louis that have the potential to emit greater than one hundred (100) tons per year of volatile organic compounds. This rule does not apply to any installation that meets one or more of the following:
   a) One or more rule under Title 10, Division 10, Chapter 5 of the *Code of State Regulations* (CSR) applies to volatile organic compound (VOC) emissions from a product process, or a raw material, intermediate or product tank;
   b) Is exempted from one or more rule under Title 10, Division 10, Chapter 5 of the CSR as it applies to VOC emissions from a product process, or a raw material, intermediate or product tank; or
   c) Is affected by any federal rulemaking promulgated under 40 CFR Part 60, 40 CFR Part 61, or 40 CFR Part 63 applies to VOC emissions from a product process, or a raw material, intermediate or product tank.

   Therefore, 10 CSR 10-5.520 is not applicable to this installation as 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations,* 40 CFR Part 63, Subpart SSSS and 40 CFR Part 60, Subpart TT are applicable and the installation is exempt from 10 CSR 10-5.520.

5) Precoat Metals does not manage any of the toxic or flammable chemicals listed at 40 CFR Part 68 Accidental Release Prevention Requirements in quantities greater than threshold levels. No Risk Management Plan was required for this installation.

6) 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations.*
   a) The installation relies on thermal oxidizers to demonstrate compliance with this regulation. Performance tests are used to establish the efficiency of the control devices. In order to ensure compliance, there must be monitoring of a parameter that is indicative of the performance of the oxidizers. Combustion chamber temperature serves this purpose as it is related to the amount of VOCs destroyed. The temperature demonstrated during the performance tests in which control efficiency was determined can be used as a basis for limiting combustion chamber temperature. The NSPS regulation allows a range of 28 degrees Celsius (°C) less than the exhibited temperature of the test and a three-hour averaging period. Using this as a guideline and for the reasons stated above, combustion chamber temperature limitations, monitoring and recordkeeping requirements are included for this condition for Line #1 and Line#2.
   b) 10 CSR 10-5.330, Control of Emissions from Industrial Surface Coating Operations does not apply to the Printer Coat Operation because the unit is performing roll printing (defined in 10 CSR 10-6.020(R)(38)), since it applies words, designs or pictures to the substrate with only partial coverage.

7) 10 CSR 10-5.442, *Control of Emissions from Lithographic Printing Operations* does not apply to the Printer Coat Operations because the rule shall not apply to printing on metal surfaces per 10 CSR 10-5.442(2)(C).

8) The units listed in the "Emission Units Without Limitations" section of this permit either have no applicable regulations associated with them or are considered insignificant activities by the operating permit application. Those units include, but are not limited to, all natural gas/LPG units with a

maximum heat input of less than ten (10) MMBtu/hr and those that burn other fuels and have a heat input of less than one (1) MMBtu/hr that emits only products of combustion.

9) Bulk Unloading into Tote Tanks (EP26) identified as EU0080 in OP2011-037 is no longer in operation. As such, any and all references to EP26 are not included in this renewal permit.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:
1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

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

Response to Public Comments

The draft P70 Operating Permit, Project 2016-02-005, for Precoat Metals (510-0027) was placed on public notice as of January 19, 2018, for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: http://dnr.mo.gov/env/apcp/permit-public-notices.htm on Friday, January 19, 2018. On February 16, 2018, the Air Pollution Control Program received comments from Mark A. Smith, Air Permitting and Compliance Branch Chief for EPA Region VII.

Comment #1: EU0010 and EU0020 (Coating Line #1) and EU0040 and EU0050 (Coating Line #2) are equipped with thermal oxidizers (TO) to control volatile organic compound (VOC) emissions and hazardous air pollutant (HAP) emissions. MoDNR indicates that the overall control efficiency for Coating Line #1 is based on performance testing conducted in December 1997 and the control efficiency of Coating Line #2 is based on performance testing conducted in 1994. The Statement of Basis says that the performance test on Coating Line #1 was demonstrated at 96% and the emission limitation for Coating Line #1 is set at a control efficiency of 95.7%. It appears that these performance tests, conducted over 20 years ago, barely meets the established limitations. Therefore, EPA suggests that MoDNR consider having Precoat Metals update the TO operating parameters by conducted performance tests on both Coating Line #1 and Coating Line #2 to verify that the TO operating conditions still achieve the required control efficiencies.

> ***Response to Comment**: The thermal oxidizers are not equipped with catalysts. The VOC and HAP control efficiencies stay consistent over the operational life since no catalysts are present that can degrade with time. Further, according to Precoat Metals' quarterly and semiannual reports, and preventive maintenance records of each TO and associated capture system have not indicated any deterioration to the thermal oxidizers, demonstrating good condition of the thermal oxidizers and the thermal oxidizers operating conditions still achieve the required control efficiencies. Therefore, the Air Pollution Control Program believes it is not yet necessary for MDNR to request Precoat Metals to conduct regular performance testing to verify that the TO operating conditions still achieve the required control efficiencies.*

Comment #2: Record keeping requirement "2)," in Permit Condition (EU0010, EU0020, EU0040 and EU0050)-001, requires the permittee to maintain a record of the VOC emission calculations for Coating Line #1 and Coating Line #2. However, there is no description of the methodology used by the permittee to calculate their VOC emissions. As stated, record keeping requirement "2)" may not be practically enforceable; therefore, EPA recommends MoDNR consider including the VOC emission calculation methodology in the Part 70 operating permit.

> ***Response to Comment**: The Record keeping requirement "2)," of Permit Condition (EU0010, EU0020, EU0040 and EU0050)-001 has been modified to more clearly delineate how to demonstrate compliance with the permit condition.*

Comment #3: Recordkeeping requirement 4), in Permit Condition (EU0010, EU0020, EU0040 and EU0050)-002, details requirements "*if the permittee uses an emission control device to achieve compliance*" (emphasis added). The earlier permit condition clearly indicates the permittee is using thermal oxidizers to achieve compliance. Additionally, Operating Limitations, in Permit Condition (EU0010, EU0020, EU0040 and EU0050)-003, says "*for any coil coating line which the permittee uses an add-on control device*" (emphasis added). Again, Permit Condition (EU0010, EU0020, EU0040 and

EU0050)-001 indicates the permittee is using thermal oxidizers as add-on control devices. EPA recommends MoDNR consider writing Permit Condition (EU0010, EU0020, EU0040 and EU0050)-002 and Permit Condition (EU0010, EU0020, EU0040 and EU0050)-003 in the present in lieu of the future. Also, the reporting requirements in (EU0010, EU0020, EU0040 and EU0050)-003 require reports be mailed to EPA at 901 North 5th Street in Kansas City, Kansas. EPA recommends MoDNR show reports for Permit Condition (EU0010, EU0020, EU0040 and EU0050)-003 be mailed to EPA's current address at 11201 Renner Boulevard, Lenexa, Kansas 66219.

Response to Comment: *The draft permit has been modified as requested.*

Comment #4: Permit Condition (EU0010, EU0020, EU0040 and EU0050)-002 incorporates applicable requirements from 10 CSR 10-5.330 - *Control of Emissions from Industrial Surface Coating Operations*; which limits discharges of VOC into the ambient air of 2.6 pounds of VOC per gallon of coating (minus water and exempt compounds) as delivered to the coating applicator. Permit Condition (EU0010 and EU0020)-004 incorporates applicable requirements from 40 CFR Part 60, Subpart TT - *Standards of Performance for Metal Coil Surface Coating (NSPS)*; which limits discharges into the atmosphere of 0.14 kilograms VOC per liter of coating solids applied. If Precoat Metals meets the emission limitation requirements of 40 CFR Part 60, Subpart TT, and can show that the limit is as stringent, or more, than the corresponding RACT rule, then it may be possible to subsume the 10 CSR 10-5.330 requirements for Coating Line #1 into the 40 CFR Part 60, Subpart TT requirements in Permit Condition (EU0010 and EU0020)-004.

Response to Comment: *The basis for the 40 CFR Part 60, Subpart TT emission limitation and the 10 CSR 10-5.330 are not comparable. The NSPS VOC limit is based on applied coating solids on a monthly basis whereas the 10 CSR 10-5.330 limit is based on the volume (gallon) of coating (minus water and non-VOC organic compounds) which includes solids on a daily basis. Since the RACT averaging time is more restrictive than the NSPS, it may not be possible to subsume 10 CSR 10-5.330 requirements for Coating Line #1 into the 40 CFR Part 60, Subpart TT requirements in Permit Condition (EU0010 and EU0020)-004. Therefore, no changes have been made to the permit as a result of this comment.*

Comment #5: Footnote 1, in Permit Condition (EU0070)-002, requires the permittee to maintain monthly fuel consumption records for a minimum of two years. However, the record keeping requirements of 10 CSR 10-6.065(6)(C)1.C, in Section V General Permit Requirements; says all required monitoring data and support information shall be retained for a period of at least five years. EPA recommend MoDNR consider resolving what appears to be contradictory record keeping requirements.

Response to Comment: *Record keeping specified in the Title V requires the source to retain all records of all required monitoring data and support information for 5 years. 40 CFR Part 60 Subpart Dc requires monthly fuel consumption records to be maintained for a minimum of two years. To be in compliance with the Subpart Dc and Title V record retention period, the source will keep the records for 5 years. Therefore, the draft permit has been modified as requested.*

Comment #6: Column E, on Attachment B, requires the permittee to calculate Coating Volume *Friction* (emphasis added) and EPA suggest MoDNR consider correcting Friction to Fraction.

Response to Comment: *The typographical error has been corrected as suggested.*