



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70
PERMIT TO OPERATE
PUBLIC VERSION

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: OP2011-013
Expiration Date: APR 20 2016
Installation ID: 031-0053
Project Number: 2009-08-023

Installation Name and Address

The Procter & Gamble Paper Products Company
14474 State Hwy. 177
Jackson, MO 63755
Cape Girardeau County

Parent Company's Name and Address

The Procter & Gamble Company
6090 Center Hill Ave.
Cincinnati, OH 45224

Installation Description:

The Procter & Gamble Paper Products Company operates a sanitary disposable paper products manufacturing facility in Cape Girardeau, Missouri. The facility manufactures diapers, tissues, and towel products. The diapers are assembled and packaged on-site. The tissues and towels are made using purchased pulp. The facility is a major source of Carbon Monoxide (CO), Greenhouse Gases (CO₂e), Particulate Matter ≤ ten microns (PM₁₀), Nitrogen Oxides (NO_x), Sulfur Oxides (SO_x), and Volatile Organic Compounds (VOCs).

APR 21 2011

Effective Date

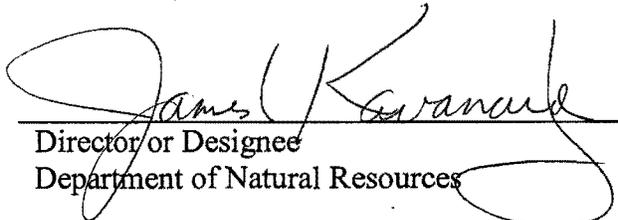

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The Procter & Gamble Paper Products Company operates a sanitary disposable paper products manufacturing facility in Cape Girardeau, Missouri. The facility manufactures diapers, tissues, and towel products. The diapers are assembled and packaged on-site. The tissues and towels are made using purchased pulp. The facility is a major source of Carbon Monoxide (CO), Greenhouse Gases (CO₂e), Particulate Matter ≤ ten microns (PM₁₀), Nitrogen Oxides (NO_x), Sulfur Oxides (SO_x), and Volatile Organic Compounds (VOCs).

Reported Air Pollutant Emissions, tons per year					
Pollutants	2009	2008	2007	2006	2005
Particulate Matter ≤ Ten Microns (PM ₁₀)	54.74	62.07	55.92	67.08	67.16
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	3.85	4.11	4.37	3.57	3.62
Sulfur Oxides (SO _x)	1.15	0.97	1.25	1.20	0.87
Nitrogen Oxides (NO _x)	148.72	160.77	172.90	153.55	145.58
Volatile Organic Compounds (VOC)	216.82	206.93	213.57	174.24	132.03
Carbon Monoxide (CO)	245.26	266.04	284.90	250.52	239.67
Lead (Pb)	-	-	-	-	-
Hazardous Air Pollutants (HAPs)	7.13	8.05	7.53	6.00	6.35
Ammonia (NH ₃)	1.62	1.73	1.84	1.49	1.52

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 #	Description of Emission Unit
02A	A Module Dust Control
03A	B Module OLBH
08A	North Plant Dust Receiver (NPDR)
11A	B Module Dust Control
15A	D Module Central Vac
18A	A, B, & C Module Central Vac
22A	Lines 62 - 69 Final Filter
24A	South Plant Dust Receiver (SPDR)
25A	D Module CSX1 Dust Control

26A	FSC DF1
27A	FSC DF2
28A	FSC DF3
29A	FSC DF4
30A	FSC DF5
31A	FSC DF6
32A	FSC DF7
33A	FSC DF8
34A	D Module CSX2 Dust Control
35A	AGM FR1 - FR4
36A	AGM FR5 - FR8
37A	AGM FR15 - FR18
38A	AGM FR11 - FR14
43A	Building 11 Central Dust Receiver
1GDE	5G Dry End
2GDE	6G Dry End
3GDE	7G Dry End
1GFR	5G Papermachine Former Equipment
2GFR	6G Papermachine Former Equipment
3GFR	7G Papermachine Former Equipment
1GME	5G Papermachine YPDES
2GME	6G Papermachine YPDES
1GPR	5G Papermachine Process Equipment
2GPR	6G Papermachine Process Equipment
3GPR	7G Papermachine Process Equipment
BOHO3	Natural Gas or Fuel Oil No.2 Fired Boiler 3
BOHO4	Natural Gas Fired Boiler 4
BOHO5	Natural Gas Fired Boiler 5
F13	Emergency Diesel Fire Pump (Pond) - 475 kW
F14	Emergency Diesel Fire Pump (South) - 215 kW
F15	Emergency Diesel Fire Pump (East) - 305 kW
F16	Emergency Diesel Fire Pump (AD Warehouse) - 225 kW
T08A	Emergency Diesel Generator (Bldg. 10) - 800 kW
T09A	Emergency Diesel Generator (Bldg. 75 N) - 350 kW
T10A	Emergency Diesel Generator (Bldg. 75 S) - 800 kW
T11A	Emergency Diesel Generator (Bldg. 47) - 350 kW
T12A	Emergency Diesel Generator (Tank Farm) - 150 kW
VOCFUG	Fugitive VOCs from Papermaking Machine Additives
SH	Space Heaters – (2) 8.5 MMBtu/hr, Natural Gas

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

39A	Pulper
40A	Dump Chest
AHU1	Air Handling Unit #1
AHU2	Air Handling Unit #2
AHU3	Air Handling Unit #3
AHU4	Air Handling Unit #4
AHU5	Air Handling Unit #5
AHU6	Air Handling Unit #6
AHU7	Air Handling Unit # 7
T01	Fixed Roof Tank - #2 Diesel; F13 Fire Pump
T02	Fixed Roof Tank - #2 Diesel; F14 Fire Pump
T03	Fixed Roof Tank - #2 Diesel; F15 Fire Pump
T08	Fixed Roof Tank - #2 Diesel; B10 Generator
T09	Fixed Roof Tank - #2 Diesel; B75N Generator
T10	Fixed Roof Tank - #2 Diesel; B75S Generator
T11	Fixed Roof Tank - #2 Diesel; B47 Generator
T12	Fixed Roof Tank - # 2 Diesel; TF Generator
T13	Fixed Roof Tank - #2 Diesel; F16 Fire Pump
PDP1	Portable Diesel Pump
PDP2	Portable Diesel Pump
	1,100 Gallon Gasoline Storage Tank
	500 Gallon Diesel Storage Tank
	550 Gallon Diesel Storage Tank
	9,000 Gallon Diesel Storage Tank
	(10) Cooling Towers

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 0695-021A, Issued August 5, 1996

Operational Limitation:

Special Condition 5: If, in the opinion of the Director, the presence of particulate matter less than ten microns (PM₁₀) in the ambient air exists in quantities and durations that directly or proximately cause or contribute to injury to human, plant, or animal life or health, or to property, or that unreasonably interferes with the enjoyment of life or the use of property, the Director may require the permittee to submit a corrective action plan adequate to timely and significantly mitigate the emission of PM₁₀. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 032003-041C, Issued October 30, 2009

Operational Limitation:

1. Special Condition 36: The permittee shall preclude all public access to the permittee's declared property boundary.
2. Exception: Members of the public performing a service for the installation such as contractors, consultants, vendors, etc. may be allowed access to the permittee's declared property boundary as necessary to complete their services.
3. The permittee shall maintain fencing around facility buildings and access roads.
4. The permittee shall post no trespassing signs around the perimeter of their property and perform periodic security checks to ensure the signs are not being ignored by the public.

PERMIT CONDITION PW003

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

Emission Limitation:

1. The permittee shall emit less than ten (10) tons of any individual Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.
2. The permittee shall emit less than twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.

Monitoring/Record Keeping:

1. The permittee shall record the amount of each HAP emitting material used or produced each month.
2. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAP using Attachments E & F or equivalent forms generated by the permittee.
3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all material used at the installation.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the emission limit of ten tons individual or 25 tons combined should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001			
Emission Units 02A, 43A, 1GDE - 3GDE, 1GFR - 3GFR, 1GME, 2GME, 1GPR - 3GPR, and BOHO3 - BOHO5 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants			
Emission Unit	Description	Stack No.	Control Device No.
02A	A Module Dust Control	02	ECD 30 and 37 Baghouses
43A	Building 11 Central Dust Receiver	43A	ECD 69 Baghouse
1GDE	5G Dry End	S6	C2 – Venturi Scrubber
2GDE	6G Dry End	S9	C4 – Venturi Scrubber
3GDE	7G Dry End	S12	C6 – Venturi Scrubber
1GFR	5G Papermachine Former Equipment	S4	C1 – Cyclonic Separator
2GFR	6G Papermachine Former Equipment	S7	C3 – Cyclonic Separator
3GFR	7G Papermachine Former Equipment	S10	C5 – Cyclonic Separator
1GME	5G Papermachine YPDES	S17	C7 – Mist Eliminator
2GME	6G Papermachine YPDES	S18	C8 – Mist Eliminator
1GPR	5G Papermachine Process Equipment	S5	-
2GPR	6G Papermachine Process Equipment	S8	
3GPR	7G Papermachine Process Equipment	S11	
BOHO3	Natural Gas or Fuel Oil No.2 Fired Boiler 3	S1	
BOHO4	Natural Gas Fired Boiler 4	S2	
BOHO5	Natural Gas Fired Boiler 5	S3	

Emission Limitation:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on every emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee may complete their Method 22 opacity readings on all of the emission units at once, provided that all of the emission units subject to this regulation can be seen from that observation location. Readings are only required when an emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then

- b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of all maintenance and any equipment malfunctions using Attachment D or an equivalent form generated by the permittee.
3. The permittee shall maintain records of any EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. Records may be kept in either written or electronic form.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002		
Emission Unit 02A		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit No. 112004-010, Issued November 23, 2004		
Emission Unit	Description	Control Device No.
02A	A Module Dust Control	ECD 30 and ECD 37 Baghouses

Operational Limitation:

1. Special Condition 1: The permittee shall control emissions from the new diaper lines using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications and engineering practices. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These

gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for baghouses, sufficient to change one set of filters, shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

2. The baghouses shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5" of water column.
 - a) Exception: Due to a lack of cake on the bag, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a bag.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall monitor and record the operating pressure drop across the baghouses at least once each operating day while the unit is operating. The operating pressure drop ranges will be specified based on normal operation and manufacturer's recommendations.
2. Special Condition 3: The permittee shall maintain an operating and maintenance log for each control device using Attachment D or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003 Emission Unit 03A 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 072008-012, Issued July 30, 2008		
Emission Unit	Description	Control Device
03A	B Module OLBH	ECD 18, 20, 25, and 26 Baghouses

Operational Limitation:

1. Special Condition 2.A: The permittee shall control emissions from the emission point using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with standard operating procedures developed according to best engineering practices. All control devices shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for baghouses, sufficient to

change one set of filters, shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

2. The baghouses shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5" of water column.
 - a) Exception: Due to a lack of cake on the bag, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a bag.

Monitoring/Recordkeeping:

1. Special Condition 2.B: The permittee shall monitor and record the operating pressure drop across the baghouses at least once each operating day while the unit is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
2. Special Condition 2.C: The permittee shall maintain an operating and maintenance log for each control device using Attachment D or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004		
Emission Units: 08A, 11A, 15A, 18A, and 22A		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit No. 0695-021A, Issued August 5, 1996		
Emission Unit	Description	Control Device No.
08A	North Plant Dust Receiver (NPDR)	ECD 36 Baghouse
11A	B Module Dust Control	ECD 28 Baghouse
15A	D Module Central Vac	ECD 06 Baghouse
18A	A, B, & C Module Central Vac	ECD 03 and ECD 15 Baghouses
22A	Lines 62 - 69 Final Filter	ECD 34 Baghouse

Operational Limitation:

1. Special Condition 1: The baghouses must be in use at all times when the facility is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications and good engineering practices. The baghouses shall be equipped with a gauge or meter which indicates the pressure drop across the baghouse. This gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. Replacement filters for baghouses, sufficient to change one set of filters, shall be kept on hand at all times.
2. Special Condition 3: The baghouses used in this facility shall be operated in conformance with good engineering practices and the manufacturer's specifications.
3. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
4. The baghouses shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5" of water column.
 - a) Exception: Due to a lack of cake on the bag, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a bag.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall monitor and record the operating pressure drop across the baghouses at least once each operating day while the unit is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
2. Special Condition 4: The permittee shall maintain an operating and maintenance log for the baghouses, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to the Department of Natural Resource' personnel upon request.
5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 005		
Emission Unit 24A		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit No. 0999-020, Issued September 30, 1999		
Emission Unit	Description	Control Device No.
24A	South Plant Dust Receiver (SPDR)	ECD 27 Baghouse

Operational Limitation:

1. Special Condition 1: The permittee shall control emissions from the new diaper lines with a baghouse as specified in the permit application. Emission Point 24A shall be equipped with a baghouse. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter which indicates the pressure drop across the control device. The gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. Replacement filters for the baghouse, sufficient to change one set of filters, shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The baghouse shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5" of water column.
 - a) Exception: Due to a lack of cake on the bag, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a bag.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall monitor and record the operating pressure drop across the baghouse at least once each operating day while the unit is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
2. Special Condition 3: The permittee shall maintain an operating and maintenance log for the baghouse, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 006		
Emission Unit 43A		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit No. 032008-008, Issued March 14, 2008		
Emission Unit	Description	Control Device
43A	Building 11 Central Dust Receiver	ECD 69 Baghouse

Operational Limitation:

1. Special Condition 2.A: The permittee shall control emissions from Building 11 Central Dust Receiver (ECD69; EP43A) using a baghouse as specified in the permit application. The baghouse shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. The gauge or meter shall be located such that the Department of Natural Resources' employees may easily observe it. Replacement filters for the baghouse, sufficient to change one set of filters, shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The baghouse shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5" of water column.
 - a) Exception: Due to a lack of cake on the bag, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a bag.

Monitoring/Recordkeeping:

1. Special Condition 2.B: The permittee shall monitor and record the operating pressure drop across the baghouse at least once each operating day while the unit is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
2. Special Condition 2.C: The permittee shall maintain an operating and maintenance log for the baghouse using Attachment D or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 007		
Emission Units 25A – 34A		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit No. 0999-020, Issued September 30, 1999		
Emission Unit	Description	Control Device No.
25A	D Module CSX1 Dust Control	ECD 38 Drum Filter
26A	FSC DF1	ECD 39 Drum Filter
27A	FSC DF2	ECD 40 Drum Filter
28A	FSC DF3	ECD 41 Drum Filter
29A	FSC DF4	ECD 42 Drum Filter
30A	FSC DF5	ECD 43 Drum Filter
31A	FSC DF6	ECD 44 Drum Filter
32A	FSC DF7	ECD 45 Drum Filter
33A	FSC DF8	ECD 46 Drum Filter
34A	D Module CSX2 Dust Control	ECD 47 Drum Filter

Operational Limitation:

1. Special Condition 1: The permittee shall control emissions from the new diaper lines with drum filters as specified in the permit application. Emission Points 25A through 34A shall be equipped with drum filters. The drum filters shall be operated and maintained in accordance with the manufacturer’s specifications. Each drum filter shall be equipped with a gauge or meter which indicates the pressure drop across the control device. These gauges or meters shall be located such that they may be easily observed by the Department of Natural Resources’ employees. Replacement filters for the drum filters, sufficient to change one set of filters, shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The drum filters shall be operated such that the minimum pressure drop across the control device is greater than or equal to 1.21” of water column.
 - a) Exception: Due to a lack of cake on the filter, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a filter.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall monitor and record the operating pressure drop across the drum filters at least once each operating day while the unit is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty.

2. Special Condition 3: The permittee shall maintain an operating and maintenance log for the drum filters, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all filter replacements.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 008		
Emission Units 35A and 36A		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit No. 0999-020, Issued September 30, 1999		
Emission Unit	Description	Control Device No.
35A	AGM FR1 - FR4	ECD 48, ECD 49, ECD 50, and ECD 51 Baghouses
36A	AGM FR5 - FR8	ECD 52, ECD 53, ECD 54, and ECD 55 Baghouses

Operational Limitation:

1. Special Condition 1: The permittee shall control emissions from the new diaper lines with baghouses as specified in the permit application. Emission Points 35A and 36A shall be equipped with baghouses. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. Each baghouse shall be equipped with a gauge or meter which indicates the pressure drop across the control device. These gauges or meters shall be located such that they may be easily observed by the Department of Natural Resources' employees. Replacement filters for baghouses, sufficient to change one set of filters, shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The baghouses shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.1 mbar.
 - a) Exception: Due to a lack of cake on the bag, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a bag.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall monitor and record the operating pressure drop across the baghouses at least once each operating day while the unit is operating. The operating pressure drop

shall be maintained within the design conditions specified by the manufacturer's performance warranty.

2. Special Condition 3: The permittee shall maintain an operating and maintenance log for the baghouses, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 009 Emission Units 37A and 38A 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 042002-003, Issued March 6, 2002		
Emission Unit	Description	Control Device No.
37A	AGM FR15 - FR18	ECD 62, ECD 63, ECD 64, and ECD 65 Baghouses
38A	AGM FR11 - FR14	ECD 58, ECD 59, ECD 60, and ECD 61 Baghouses

Operational Limitation:

1. Special Condition 1: The permittee shall control emissions from the absorbent delivery systems using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouses shall be equipped with a gauge or meter which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for baghouses, sufficient to change one set of filters, shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The baghouses shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.1 mbar.
 - a) Exception: Due to a lack of cake on the bag, the permittee is not restricted to a minimum pressure drop across the control device for the first 96 hours after replacement of a bag.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall monitor and record the operating pressure drop across the baghouses at least once each operating day while the unit is operating. The operating pressure drop ranges will be specified based on normal operation and manufacturer’s recommendations.
2. Special Condition 3: The permittee shall maintain an operating and maintenance log for the baghouses, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 010					
Emission Units 1GPR – 3GPR					
10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating					
Emission Unit	Description	Construction Date	MHDR (MMBtu/hr)	Fuel	Stack No.
1GPR	5G Papermachine Process Equipment	1998		Natural Gas	S5
2GPR	6G Papermachine Process Equipment	1998		Natural Gas	S8
3GPR	7G Papermachine Process Equipment	2002		Natural Gas	S11
SH	(2) Space Heaters	-		Natural Gas	-

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.13 pounds per million BTU of heat input.

Operational Limitation:

The permittee shall calibrate, maintain and operate the emission units according to the manufacturer's specifications and recommendations.

Monitoring/Recordkeeping:

1. Maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment D or an equivalent form generated by the permittee.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.
5. Attachment H contains calculations which demonstrate that these emission units will never exceed the emission limitation while burning the specified fuel.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 011	
Emission Units 1GPR – 3GPR	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 032003-041C Issued October 30, 2009	
Emission Unit	Description
1GPR	5G Papermachine Process Equipment
2GPR	6G Papermachine Process Equipment
3GPR	7G Papermachine Process Equipment

Emission Limitations:

1. Special Condition 3: The permittee shall use low Nitrogen Oxide (NO_x) natural gas-fired burners employing good combustion controls to meet the BACT emission limitation for NO_x of 0.115 lb/MMBTU based on a one (1) hour averaging time while the burners are operated above 50 percent capacity.
2. Special Condition 4: The permittee shall use natural gas-fired burners employing good combustion controls to meet the BACT limitation for Carbon Monoxide (CO) of 0.173 lb/MMBTU based on a one (1) hour averaging time while the burners are operated above 50 percent capacity.

Monitoring/Recordkeeping:

1. The permittee shall maintain an operating and maintenance log for the burners, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

2. Special Condition 24: The permittee shall demonstrate compliance with the CO and NO_x emission limitations in Special Conditions 3 and 4 by conducting annual stack tests. The applicable test methods and procedures for the following pollutants are summarized next. An alternate method(s) of quantifying the emission rates of pollutants may be used in place of the above testing requirement, if requested by the permittee and approved by the Director:
 - a) The test methods and procedures outlined at 40 CFR 60 Appendix A, Method 7E shall be adhered to by the applicant in testing for NO_x to determine that the limits established in the applicable requirements have been met.
 - b) The test methods and procedures outlined at 40 CFR Part 60, Appendix A, Method 10 shall be adhered to by the applicant in testing for CO.
3. Special Condition 25: The date on which performance tests are conducted must be pre-arranged with the Air Pollution Control Program a minimum of 30 days prior to the proposed test date so that this Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. A completed Proposed Test Plan form may serve the purpose of notification and must be approved by the Air Pollution Control Program prior to conducting the required emission testing.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. Records may be kept in either written or electronic form.
6. All records shall be maintained for five years.

Reporting:

1. Special Condition 26: Two (2) copies of a written report of the performance test results demonstrating compliance with Special Conditions 3 and 4 shall be submitted to the Director of the Air Pollution Control Program within 30 days of completion of any required testing. The report shall include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA Method for at least one (1) sample run.
2. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
3. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 012	
Emission Units 1GPR – 3GPR	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 032003-041C Issued October 30, 2009	
Emission Unit	Description
1GPR	5G Papermachine Process Equipment
2GPR	6G Papermachine Process Equipment
3GPR	7G Papermachine Process Equipment

Emission Limitations:

1. Special Condition 5: The permittee shall emit less than 22.7 pounds of NO_x per hour from the papermachine process section of each papermachine while any single burner is operated at or below 50 percent capacity.
2. Special Condition 6: The permittee shall emit less than 34.3 pounds of CO per hour from the papermachine process section of each papermachine while any single burner is operated at or below 50 percent capacity.

Monitoring/Recordkeeping:

1. The permittee shall maintain an operating and maintenance log for the burners, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with the emission limitations for CO found in Special Condition 6.

Emission Unit	Description	Stack Test Date	CO Emission Rate (lb/hr)	CO Emission Rate (lb/MMBtu)
1 GPR	5G Papermachine Process Equipment	4/16/2008		
2 GPR	6G Papermachine Process Equipment	4/2/2007		
3 GPR	7G Papermachine Process Equipment	4/15/2008		

3. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with the emission limitations for NO_x found in Special Condition 5.

Emission Unit	Description	Stack Test Date	NO _x Emission Rate (lb/hr)	NO _x Emission Rate (lb/MMBtu)
1 GPR	5G Papermachine Process Equipment	4/3/2007		
2 GPR	6G Papermachine Process Equipment	4/2/2007		
3 GPR	7G Papermachine Process Equipment	4/24/2009		

4. Special Condition 27: The permittee shall submit a test report to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations. Specifically, the following operational and emission parameters shall be met:
 - a) The predryer burner augmenting air directional vanes operational range for each papermachine has been determined to be 4 to 7 for Papermachines 5G and 6G and 3 to 7 for Papermachine 7G.

- b) When operating the predryer burners in conjunction with the Yankee burner during normal operation, weekly visual observations shall be performed on the augmenting vanes of each papermachine to ensure the vanes are maintained in the operational range set above. The permittee shall submit quarterly reports detailing all exceptions to these requirements to the Director.
- c) The temperature of the Yankee Hood of each papermachine shall be reviewed to determine a suitable operational range to ensure compliance with emission limits when the predryers are not in operation. The permittee shall submit a detailed report to the Air Pollution Control Program for approval.
- d) When operating the Yankee burner without the predryer burners during normal operations, daily recordings and logs of the Yankee hood temperature shall be performed to ensure that the Yankee burner is operating in the range set in Special Condition 27.C. The permittee shall submit quarterly reports detailing all exceptions to these requirements to the Director.
- 5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 6. Records may be kept in either written or electronic form.
- 7. All records shall be maintained for five years.
- 8. The newest stack test results for these emission units shall be kept onsite indefinitely until new stack testing is performed.

Reporting:

- 1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 013 Emission Units 1GFR – 3GFR 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 032003-041C, Issued October 30, 2009 And Construction Permit No. 052007-011A, Issued December 22, 2008		
Emission Unit	Description	Control Device No.
1GFR	5G Papermachine Former Equipment	C1 Cyclonic Separator
2GFR	6G Papermachine Former Equipment	C3 Cyclonic Separator
3GFR	7G Papermachine Former Equipment	C5 Cyclonic Separator

Emission Limitations/Operation Limitations:

- 1. Construction Permit No. 032003-041C, Special Condition 1: The permittee shall use a cyclonic separator with an efficiency of at least 90 percent to achieve the Best Available Control Technology (BACT) limitation for Particulate Matter less than ten microns (PM₁₀) of 1.10 pounds per hour.

2. Construction Permit No. 052007-011A, Special Condition 2.A: Cyclones must be used to control emissions from the forming sections of the 5G, 6G, and 7G papermachines. The cyclones must be in use at all times when these papermachines are in operation, except during the start-up or shutdown period, and shall be operated and maintained in accordance with the manufacturer's specifications and recommendations, and any locally prepared operating procedures.

Monitoring/Recordkeeping:

1. Construction Permit No. 052007-011A, Special Condition 2.B: The permittee shall maintain an operating and maintenance log for each cyclone, using Attachment D or an equivalent form generated by the permittee, that shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
 - c) Records may be kept in either written or electronic form.
2. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with this emission limitation.

Emission Unit	Description	Stack Test Date	PM ₁₀ Emission Rate (lb/hr)
1 GFR	5G Papermachine Former Equipment	10/26/2000	
2 GFR	6G Papermachine Former Equipment	3/14/2002	
3 GFR	7G Papermachine Former Equipment	9/24/2008	

3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.
5. The newest stack test results for these emission units shall be kept onsite indefinitely until new stack testing is performed.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations/operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 014 Emission Units 1GDE – 3GDE 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 032003-041C, Issued October 30, 2009 And Construction Permit No. 052007-011A, Issued December 22, 2008		
Emission Unit	Description	Control Device No.
1GDE	5G Dry End	C2 Venturi Scrubber
2GDE	6G Dry End	C4 Venturi Scrubber
3GDE	7G Dry End	C6 Venturi Scrubber

Emission Limitations/Operation Limitations:

1. Construction Permit No. 032003-041C, Special Condition 2: The permittee shall use a venturi scrubber with an efficiency of at least 95 percent to achieve the BACT limitation for PM₁₀ of 0.62 pounds per hour.
2. Construction Permit No. 052007-011A, Special Condition 3.A: Scrubbers must be used to control emissions from the dry end of the 5G, 6G, and 7G papermachines. The scrubbers shall be operated and maintained in accordance with the manufacturer’s specifications and recommendations, and the permittee’s current best approaches for dry end dust control failure. In the event that the fan associated with the scrubber is shutdown, production operations may continue for a maximum of four hours after scrubber fan shutdown.
3. Construction Permit No. 052007-011A, Special Condition 3.B: Scrubbers shall be equipped with a flow meter that indicates the flow through the scrubbers. These meters shall be located in such a way they may be easily observed by Department of Natural Resources’ employees.

Monitoring/Recordkeeping:

1. Construction Permit No. 052007-011A, Special Condition 3.C: The permittee shall monitor and record the flow rate through the scrubbers at least once every twenty-four (24) hours. The flow rate shall be maintained within the design conditions specified by the manufacturer’s performance warranty.
2. Construction Permit No. 052007-011A, Special Condition 3.D: The permittee shall maintain an operating and maintenance log for the scrubbers, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
 - c) A copy of the current best approach for dry end dust control failure verification.
 - d) A written record of regular inspection schedule, the date and results of all inspections including actions or maintenance activities that result from that inspection.
 - e) Records may be kept in either written or electronic form.
3. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with the emission limitation.

Emission Unit	Description	Stack Test Date	PM ₁₀ Emission Rate (lb/hr)	Minimum Flow Rate (gallon/min)
1 GDE	5G Dry End	10/26/2000		225
2 GDE	6G Dry End	3/13/2002		225
3 GDE	7G Dry End	9/24/2008		350

4. The permittee shall record the flow rate once per operating day. This record shall be kept using Attachment L or an equivalent form generated by the permittee.
5. The permittee shall verify that the scrubbers are being operated above the minimum flow rate on a daily basis.
6. The minimum flow rate does not apply during periods of start-up and shutdown.
7. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
8. All records shall be maintained for five years.
9. The newest stack test results for these emission units shall be kept onsite indefinitely until new stack testing is performed.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 015				
Emission Units 1GME and 2GME				
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes				
Emission Unit	Description	MHDR (tons/hr)	Control Device No.	Stack No.
1GME	5G Papermachine YPDES		C7 – Mist Eliminator	S17
2GME	6G Papermachine YPDES		C8 – Mist Eliminator	S18

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of the limits given in the following table:

Emission Unit	Description	PM Emission Limit (lb/h)
1GME	5G Papermachine YPDES	
2GME	6G Papermachine YPDES	

2. No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Record Keeping:

1. The permittee shall retain the potential to emit calculations in Attachment I which demonstrate that the above emission limitation will never be exceeded. No further record keeping shall be required to demonstrate compliance with the emission limitations.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 016	
Emission Units BOHO3 – BOHO5	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 032003-041C, Issued October 30, 2009	
Emission Unit	Description
BOHO3	Natural Gas or Fuel Oil No.2 Fired Boiler 3
BOHO4	Natural Gas Fired Boiler 4
BOHO5	Natural Gas Fired Boiler 5

Emission Limitations:

1. If the boilers are burning natural gas and operating above 25 percent capacity:
 - a) Special Condition 8: The permittee shall use low NO_x natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for PM₁₀ of 0.007 lb/MMBTU.
 - b) Special Condition 10: The permittee shall use low NO_x natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for VOC of 0.052 lb/MMBTU.
2. If the boilers are burning natural gas and operating below 25 percent capacity:
 - a) Special Condition 17: The permittee shall emit less than 0.22 pounds of PM₁₀ per hour from Boilers 3 and 4 and less than 0.32 pounds of PM₁₀ per hour from Boiler 5.
 - b) Special Condition 19: The permittee shall emit less than 1.63 pounds of VOC per hour from Boilers 3 and 4 and less than 2.41 pounds of VOC per hour from Boiler 5.
 - c) Special Condition 20: The permittee shall emit less than 4.69 pounds of CO per hour from Boilers 3 and 4 and less than 6.94 pounds of CO per hour from Boiler 5.
3. If Boiler 3 is burning fuel oil:
 - a) Special Condition 12: Fuel Oil No. 2 may be used as a backup fuel for Boiler 3. When oil is burned, this boiler shall be limited to a heat input of 50 MMBTU per hour for a maximum of 744 hours per consecutive 12-month period. Oil combusted in this boiler shall have a maximum sulfur content of 0.10 percent.
 - b) Special Condition 13: The permittee shall use low NO_x natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for PM₁₀ of 0.05 lb/MMBTU.
 - c) Special Condition 14: The permittee shall use low NO_x natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for NO_x of 0.17 lb/MMBTU based on a one (1) hour averaging time.
 - d) Special Condition 15: The permittee shall use low NO_x natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for VOC of 0.052 lb/MMBTU.

- e) Special Condition 16: The permittee shall use low NO_x natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for CO of 0.15 lb/MMBTU based on a (1) hour averaging time.

Monitoring/Recordkeeping:

1. The permittee shall maintain records from each purchase of Fuel Oil No. 2 to demonstrate compliance with the maximum sulfur content limitation.
2. The permittee shall maintain a usage log for Boiler 3 while Fuel Oil No. 2 is being burned using Attachment K or an equivalent form generated by the permittee to demonstrate compliance with the 744 hours of usage per consecutive 12-month period operational limitation.
3. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with the emission limitations of Special Condition 11 for CO when the boilers are burning natural gas above 25 percent capacity.

Emission Unit	Description	Stack Test Date	CO Emission Rate (lb/MMBtu)
BOHO3	Natural Gas or Fuel Oil No.2 Fired Boiler 3	4/21/2009	
BOHO4	Natural Gas Fired Boiler 4	4/16/2008	
BOHO5	Natural Gas Fired Boiler 5	4/21/2009	

4. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with the emission limitations of Special Conditions 8 and 10 for PM₁₀ and VOC when the boilers are burning natural gas above 25 percent capacity.

Emission Unit	Description	Stack Test Date	VOC Emission Rate (lb/MMBtu)	PM ₁₀ Emission Rate (lb/MMBtu)
BOHO3	Natural Gas Fired Boiler 3	4/15/2000		
BOHO4	Natural Gas Fired Boiler 4	4/14/2000		
BOHO5	Natural Gas Fired Boiler 5	4/08/2004		

5. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with the emission limitations of Special Conditions 17 and 19 for PM₁₀ and VOC when the boilers are burning natural gas below 25 percent capacity.

Emission Unit	Description	Stack Test Date	VOC Emission Rate (lb/hr)	PM ₁₀ Emission Rate (lb/hr)
BOHO3	Natural Gas Fired Boiler 3	4/15/2000		
BOHO4	Natural Gas Fired Boiler 4	4/14/2000		
BOHO5	Natural Gas Fired Boiler 5	4/08/2004		

6. The permittee shall retain the stack tests listed in the table below which demonstrates compliance with the emission limitations of Special Condition 20 for CO when the boilers are burning natural gas below 25 percent capacity.

Emission Unit	Description	Stack Test Date	CO Emission Rate (lb/hr)
BOHO3	Natural Gas Fired Boiler 3	4/21/2009	
BOHO4	Natural Gas Fired Boiler 4	4/22/2009	
BOHO5	Natural Gas Fired Boiler 5	4/23/2009	

7. The permittee shall retain the stack test listed in the table below which demonstrates compliance with the emission limitations of Special Conditions 13, 14, 15, and 16 for Boiler 3 when burning Fuel Oil No. 2.

Emission Unit	Description	Stack Test Date	CO Emission Rate (lb/MMBtu)	NO _x Emission Rate (lb/MMBtu)	VOC Emission Rate (lb/MMBtu)	PM ₁₀ Emission Rate (lb/MMBtu)
BOHO3	Fuel Oil No.2 Fired Boiler 3	4/16/2000				

8. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
9. Records may be kept in either written or electronic form.
10. All records shall be maintained for five years.
11. The newest stack test results for these emission units shall be kept onsite indefinitely until new stack testing is performed.

Reporting:

- The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 017 Emission Units BOHO3 – BOHO5 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 032003-041C, Issued October 30, 2009	
Emission Unit	Description
BOHO3	Natural Gas or Fuel Oil No.2 Fired Boiler 3
BOHO4	Natural Gas Fired Boiler 4
BOHO5	Natural Gas Fired Boiler 5

Emission Limitations:

- If the boilers are burning natural gas and operating above 25 percent capacity:
 - Special Condition 11: The permittee shall use low Nitrogen Oxide (NO_x) natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for CO of 0.15 lb/MMBtu based on a one (1) hour averaging time.

Monitoring/Recordkeeping:

- The permittee shall maintain an operating and maintenance log for the burners, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

2. Special Condition 24: The permittee shall demonstrate compliance with the CO emission limitations in Special Condition 11 by conducting annual stack tests. The applicable test methods and procedures are summarized next. An alternate method(s) of quantifying the emission rates of pollutants may be used in place of the above testing requirement, if requested by the permittee and approved by the Director:
 - a) The test methods and procedures outlined at 40 CFR Part 60, Appendix A, Method 10 shall be adhered to by the applicant in testing for CO.
3. Special Condition 25: The date on which performance tests are conducted must be pre-arranged with the Air Pollution Control Program a minimum of 30 days prior to the proposed test date so that this Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. A completed Proposed Test Plan form may serve the purpose of notification and must be approved by the Air Pollution Control Program prior to conducting the required emission testing.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. Records may be kept in either written or electronic form.
6. All records shall be maintained for five years.

Reporting:

1. Special Condition 26: Two (2) copies of a written report of the performance test results demonstrating compliance with Special Condition 11 shall be submitted to the Director of the Air Pollution Control Program within 30 days of completion of any required testing. The report shall include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA Method for at least one (1) sample run.
2. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
3. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 018	
Emission Units BOHO3 – BOHO5	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 032003-041C, Issued October 30, 2009	
Emission Unit	Description
BOHO3	Natural Gas Fired Boiler 3
BOHO4	Natural Gas Fired Boiler 4
BOHO5	Natural Gas Fired Boiler 5

Emission Limitations:

1. If the boilers are burning natural gas and operating above 25 percent capacity:
 - a) Special Condition 9: The permittee shall use low NO_x natural gas-fired burners without Flue Gas Recirculation and employ good combustion control to meet the BACT emission limitation for NO_x of 0.055 lb/MMBtu based on a 30-day rolling averaging time and 0.07 lb/MMBtu based on a one-hour averaging time.

2. If the boilers are burning natural gas and operating below 25 percent capacity:
 - a) Special Condition 18: The permittee shall emit less than 2.50 pounds of NO_x per hour from Boilers 3 and 4 and less than 3.70 pounds of NO_x per hour from Boiler 5.

Monitoring/Testing:

1. Compliance with the NO_x emission standards shall be determined through performance testing. [§60.46b(c)]
2. To determine compliance with the emission limits for NO_x, the owner or operator of an affected facility shall conduct the performance test as required under §60.8 using the continuous system for monitoring NO_x under §60.48(b). [§60.46b(e)]
 - a) For the initial compliance test, NO_x from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the NO_x emission standards. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period. [§60.46b(e)(1)]
 - b) Following the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, the owner or operator of an affected facility that has a heat input capacity of 73 MW (250 MMBtu/hr) or less and that combusts natural gas shall determine compliance with the NO_x standards through the use of a 30-day performance test. The 30-day rolling average emission rate shall be calculated each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days. [§60.46b(e)(4)]
3. The permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere, and shall record the output of the system. [§60.48b(b)(1)]
4. The CEMS shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. [§60.48b(c)]
5. The one-hour average NO_x emission rates measured by the continuous NO_x monitor required under §60.13(h) shall be expressed in lb/MMBtu heat input and shall be used to calculate the average emission rates. The one-hour averages shall be calculated using the data points required under §60.13(h)(2). [§60.48b(d)]
6. The procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems. [§60.48b(e)]
 - a) NO_x span values for natural gas combustion shall be 500 ppm. [§60.48b(e)(2)(i)]
 - b) As an alternative the permittee may elect to use the NO_x span values determined according to Section 2.1.2 in Appendix A to part 75 of this chapter. [§60.48b(e)(2)(ii)]
7. When NO_x emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 of Appendix A of this part, Method 7A of Appendix A of this part, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days. [§60.48b(f)]

Recordkeeping:

1. The permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere, and shall record the output of the system. [§60.48b(b)(1)]
2. The CEMS shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. [§60.48b(c)]
3. The permittee shall record and maintain records of the amount of fuel combusted during each calendar month. The CEMS shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. [§60.49b(d)(2)]
4. The permittee shall maintain records of the following information for each steam generating unit operating day: [§60.49b(g)]
 - a) Calendar date; [§60.49b(g)(1)]
 - b) The average hourly NO_x emission rates (expressed as NO₂) (lb/MMBtu heat input) measured or predicted; [§60.49b(g)(2)]
 - c) The 30-day average NO_x emission rates (lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days; [§60.49b(g)(3)]
 - d) Identification of the steam generating unit operating days when the calculated 30-day average NO_x emission rates are in excess of the NO_x emissions standards, with the reasons for such excess emissions as well as a description of corrective actions taken; [§60.49b(g)(4)]
 - e) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; [§60.49b(g)(5)]
 - f) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data; [§60.49b(g)(6)]
 - g) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted; [§60.49b(g)(7)]
 - h) Identification of the times when the pollutant concentration exceeded full span of the CEMS; [§60.49b(g)(8)]
 - i) Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3; and [§60.49b(g)(9)]
 - j) Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of this part. [§60.49b(g)(10)]
5. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
6. Records may be kept in either written or electronic form.
7. All records shall be maintained for five years.

Reporting:

1. The permittee shall submit to the Administrator the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in Appendix B of this part. [§60.49b(b)]
2. The permittee is required to submit excess emission reports for any excess emissions that occurred during the reporting period. [§60.49b(h)]
3. The permittee shall submit reports containing the information recorded §60.49b(g). [§60.49b(i)]

4. The owner or operator of an affected facility may submit electronic quarterly reports for NO_x in lieu of submitting the written reports required under §60.49b(h) and §60.49b(i). The format of each quarterly electronic report shall be coordinated with the permitting authority. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this subpart was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the permitting authority to obtain their agreement to submit reports in this alternative format. [§60.49b(v)]
5. The reporting period for the reports required under this subpart is each six month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. [§60.49b(w)]
6. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
7. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 019	
Emission Unit BOHO3	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
Emission Unit	Description
BOHO3	Fuel Oil No.2 Fired Boiler 3 ¹

¹This regulation is only applicable to BOHO3 Boiler 3 when the boiler is combusting fuel oil. The boiler is exempt while combusting natural gas per 10 CSR 10-6.260(1)(A)2.

Emission Limitation:

1. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight (8) pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards:

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99 th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

Monitoring/Record Keeping:

1. The permittee shall retain the potential to emit calculations in Attachment G which demonstrate that the above emission limitation will never be exceeded.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 020 Emission Unit BOHO3 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	
Emission Unit	Description
BOHO3	Fuel Oil No.2 Fired Boiler 3

Standards:

1. *Sulfur Dioxide (SO₂):*
 - a) On and after the date on which the initial SO₂ performance test is completed or required to be completed under §60.8, whichever date comes first, the permittee shall not cause to be discharged into the atmosphere from the affected facility any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, the permittee shall not combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. [§60.42c(d)]
 - b) Compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable. [§60.42c(h)]
 - c) The SO₂ emission limits and fuel oil sulfur limits under this section apply at all times, including periods of startup, shutdown, and malfunction. [§60.42c(i)]
 - d) The permittee is not required to operate an SO₂ CEMS if they demonstrate compliance with the SO₂ standards based on fuel supplier certification, as described under §60.48c(f). [§60.46c(e)]
2. *Opacity:*
 - a) On and after the date on which the initial opacity performance test is completed or required to be completed under §60.8, whichever date comes first, the permittee shall not cause to be discharged into the atmosphere from the affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. [§60.43c(c)]
 - b) The opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction. [§60.43c(d)]

- c) The permittee is not required to operate a COMS if they follow the applicable procedures in §60.48c(f). [§60.47c(c)]

Monitoring/Testing:

1. *Sulfur Dioxide (SO₂):*
 - a) The SO₂ performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable. [§60.44c(h)]
2. *Opacity:*
 - a) The permittee shall conduct an initial opacity performance test as required under §60.8, and shall conduct subsequent opacity performance tests as requested by the Administrator, to determine compliance with the opacity standards using the following procedures and reference methods. [§60.45c(a)]
 - i) Method 9 of Appendix A-4 of this part shall be used for determining the opacity of stack emissions. [§60.45c(a)(8)]
 - b) The permittee shall conduct the opacity performance tests using Method 9 of Appendix A-4 of this part and the procedures in §60.11 to demonstrate compliance with the applicable limit in §60.43c and shall comply with either Paragraphs (a)(1), (a)(2), or (a)(3) of this section. If during the initial 60 minutes of observation all six-minute averages are less than ten percent and all individual 15-second observations are less than or equal to 20 percent, the observation period may be reduced from three hours to 60 minutes. [§60.47c(a)]
 - i) Except as provided in Paragraph (a)(2) and (a)(3) of this section, the permittee shall conduct subsequent Method 9 of Appendix A-4 of this part performance tests using the procedures in Paragraph (a) of this section according to the applicable schedule in Paragraphs (a)(1)(i) through (a)(1)(iv) of this section, as determined by the most recent Method 9 of Appendix A-4 of this part performance test results. [§60.47c(a)(1)]
 - (1) If no visible emissions are observed, a subsequent Method 9 of Appendix A-4 of this part performance test must be completed within 12 calendar months from the date that the most recent performance test was conducted; [§60.47c(a)(1)(i)]
 - (2) If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to five percent, a subsequent Method 9 of Appendix A-4 of this part performance test must be completed within six calendar months from the date that the most recent performance test was conducted; [§60.47c(a)(1)(ii)]
 - (3) If the maximum six-minute average opacity is greater than five percent but less than or equal to ten percent, a subsequent Method 9 of Appendix A-4 of this part performance test must be completed within three calendar months from the date that the most recent performance test was conducted; or [§60.47c(a)(1)(iii)]
 - (4) If the maximum six-minute average opacity is greater than ten percent, a subsequent Method 9 of Appendix A-4 of this part performance test must be completed within 30 calendar days from the date that the most recent performance test was conducted. [§60.47c(a)(1)(iv)]
 - ii) If the maximum 6-minute opacity is less than ten percent during the most recent Method 9 of Appendix A-4 of this part performance test, the permittee may, as an alternative to performing subsequent Method 9 of Appendix A-4 of this part performance tests, elect to perform subsequent monitoring using Method 22 of Appendix A-7 of this part according to the procedures specified in Paragraphs (a)(2)(i) and (ii) of this section. [§60.47c(a)(2)]

- (1) The permittee shall conduct 10 minute observations (during normal operation) each operating day the affected facility fires fuel for which an opacity standard is applicable using Method 22 of Appendix A-7 of this part and demonstrate that the sum of the occurrences of any visible emissions is not in excess of five percent of the observation period (i.e. , 30 seconds per ten minute period). If the sum of the occurrence of any visible emissions is greater than 30 seconds during the initial ten minute observation, immediately conduct a 30 minute observation. If the sum of the occurrence of visible emissions is greater than five percent of the observation period (i.e., 90 seconds per 30 minute period) the permittee shall either document and adjust the operation of the facility and demonstrate within 24 hours that the sum of the occurrence of visible emissions is equal to or less than five percent during a 30 minute observation (i.e., 90 seconds) or conduct a new Method 9 of Appendix A-4 of this part performance test using the procedures in Paragraph (a) of this section within 30 calendar days according to the requirements in §60.45c(a)(8). [§60.47c(a)(2)(i)]
- (2) If no visible emissions are observed for 30 operating days during which an opacity standard is applicable, observations can be reduced to once every seven operating days during which an opacity standard is applicable. If any visible emissions are observed, daily observations shall be resumed. [§60.47c(a)(2)(ii)]

Recordkeeping:

1. Except as provided under Paragraph (g)(2) of this section, the permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [§60.48c(g)(1)]
2. As an alternative to meeting the requirements of Paragraph (g)(1) of this section, the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month. [§60.48c(g)(2)]
3. All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years.
6. *Sulfur Dioxide (SO₂)*:
 - a) The permittee shall keep records including the following information. [§60.48c(e)]
 - i) Calendar dates covered in the reporting period. [§60.48c(e)(1)]
 - ii) Records of fuel supplier certification as described under Paragraph (f) of this section. [§60.48c(e)(11)]
 - (1) Fuel supplier certification shall include the following information: [§60.48c(f)]
 - (a) For distillate oil: [§60.48c(f)(1)]
 - (i) The name of the oil supplier; [§60.48c(f)(1)(i)]
 - (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and [§60.48c(f)(1)(ii)]
 - (iii)The sulfur content or maximum sulfur content of the oil. [§60.48c(f)(1)(iii)]
7. *Opacity*:
 - a) In addition to the applicable requirements in §60.7, the permittee shall maintain records according to the requirements specified in Paragraphs (c)(1) and (c)(2) of this section, as applicable to the visible emissions monitoring method used. [§60.48c(c)]
 - i) For each opacity performance test conducted using Method 9 of Appendix A-4 of this part, permittee shall keep the records including the information specified in Paragraphs (c)(1)(i) through (iii) of this section. [§60.48c(c)(1)]

- (1) Dates and time intervals of all opacity observation periods; [§60.48c(c)(1)(i)]
- (2) Name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and [§60.48c(c)(1)(ii)]
- (3) Copies of all visible emission observer opacity field data sheets; [§60.48c(c)(1)(iii)]
- ii) For each opacity performance test conducted using Method 22 of Appendix A-4 of this part, the owner or operator shall keep the records including the information specified in Paragraphs (c)(2)(i) through (iv) of this section. [§60.48c(c)(2)]
 - (1) Dates and time intervals of all visible emissions observation periods; [§60.48c(c)(2)(i)]
 - (2) Name and affiliation for each visible emission observer participating in the performance test; [§60.48c(c)(2)(ii)]
 - (3) Copies of all visible emission observer opacity field data sheets; and [§60.48c(c)(2)(iii)]
 - (4) Documentation of any adjustments made and the time the adjustments were completed to the affected facility operation by the permittee to demonstrate compliance with the applicable monitoring requirements. [§60.48c(c)(2)(iv)]

Reporting:

1. The permittee shall submit to the Administrator all of the performance tests data from the initial and any subsequent performance tests. [§60.48c(b)]
2. The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. [§60.48c(j)]
3. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
4. The permittee shall report any deviations from the standards, monitoring/testing, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.
5. *Sulfur Dioxide (SO₂)*:
 - a) The permittee shall submit reports including the following information. [§60.48c(e)]
 - i) Calendar dates covered in the reporting period. [§60.48c(e)(1)]
 - ii) Records of fuel supplier certification as described under Paragraph (f) of this section. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. [§60.48c(e)(11)]
6. *Opacity*:
 - a) In addition to the applicable requirements in §60.7, the permittee shall submit excess emission reports for any excess opacity emissions from the affected facility that occur during the reporting period. [§60.48c(c)]

PERMIT CONDITION 021 Emission Unit VOCFUG 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 032003-041C Issued October 30, 2009	
Emission Unit	Description
VOCFUG	Fugitive VOCs from Papermaking Machine Additives

Emission Limitation/Operational Limitation:

Special Condition 7: The permittee shall use low Volatile Organic Compounds (VOC) content additives consistent with product quality and equipment operational reliability requirements to meet the BACT limitation for VOC of two (2) percent of the weighted average of the total additives in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all additives used at the installation.
2. The permittee shall, for each calendar month, calculate the 12-month rolling weighted average of the volatile organic compounds in the papermaking additives from the amounts of each additive used during the most recent 12-month period and the VOC content of those additives (see Attachment M or an equivalent spreadsheet generated by the permittee).
3. Records may be kept in either written or electronic form.
4. All records shall be maintained for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which records indicate the source has exceeded the two percent VOC weighted average per total additives in any consecutive 12-month period.
2. The permittee shall report any deviations from the emission limitation/operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 022	
Emission Units F13 – F15 and T08A – T12A	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit No. 032002-009, Issued February 25, 2002	
Emission Unit	Description
F13	Emergency Diesel Fire Pump (Pond) - 475 kW
F14	Emergency Diesel Fire Pump (South) - 215 kW
F15	Emergency Diesel Fire Pump (East) - 305 kW
T08A	Emergency Diesel Generator (Bldg. 10) - 800 kW
T09A	Emergency Diesel Generator (Bldg. 75 N) - 350 kW
T10A	Emergency Diesel Generator (Bldg. 75 S) - 800 kW
T11A	Emergency Diesel Generator (Bldg. 47) - 350 kW
T12A	Emergency Diesel Generator (Tank Farm) - 150 kW

Operational Limitation:

Special Condition 1: The operating hours of the emergency equipment shall not exceed 500 hours in any consecutive 12-month period. To facilitate the record keeping for this condition, the emergency equipment shall be equipped with a non-resettable running time meter.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall maintain a record of the number of operating hours of the emergency fire pumps (F13, F14, and F15) and the emergency generators (T08A, T09A, T10A, T11A, and T12A). Attachment J or an equivalent form generated by the permittee shall be used for this purpose. The permittee shall maintain all records for five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include the operating hours for that month and the total hours of operation for the previous 12-month period.
2. Records may be kept in either written or electronic form.
3. All records shall be maintained for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. Special Condition 3: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the operating hour records indicate the source has exceeded the 500 operating hour limitation for any consecutive 12-month period.
2. The permittee shall report any deviations from the operational limitation and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 023 Emission Unit F16 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 032003-041C, Issued October 30, 2009	
Emission Unit	Description
F16	Emergency Diesel Fire Pump (AD Warehouse) - 225 kW

Operational Limitation:

Special Condition 33: The operating hours of the emergency fire pump (F16) shall not exceed 500 hours in any consecutive 12-month period. To facilitate the record keeping for this condition, the emergency equipment shall be equipped with a non-resettable running time meter.

Monitoring/Recordkeeping:

1. Special Condition 34: The permittee shall maintain a record of the number of operating hours of the emergency fire pump (F16). Attachment J or an equivalent form generated by the permittee shall be used for this purpose. The permittee shall maintain all records for five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include the operating hours for that month and the total hours of operation for the previous 12-month period.
2. Records may be kept in either written or electronic form.
3. All records shall be maintained for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. Special Condition 35: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the operating hour records indicate the source has exceeded the 500 operating hour limitation.
2. The permittee shall report any deviations from the operational limitation and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 024

Emission Units F13 – F16 and T08A – T12A
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for
 Stationary Reciprocating Internal Combustion Engines¹

Emission Unit	Description
F13	Emergency Diesel Fire Pump (Pond) - 475 kW
F14	Emergency Diesel Fire Pump (South) - 215 kW
F15	Emergency Diesel Fire Pump (East) - 305 kW
F16	Emergency Diesel Fire Pump (AD Warehouse) - 225 kW
T08A	Emergency Diesel Generator (Bldg. 10) - 800 kW
T09A	Emergency Diesel Generator (Bldg. 75 N)- 350 kW
T10A	Emergency Diesel Generator (Bldg. 75 S) - 800 kW
T11A	Emergency Diesel Generator (Bldg. 47) - 350 kW
T12A	Emergency Diesel Generator (Tank Farm) - 150 kW

¹An existing emergency stationary CI RICE located at an area source of HAP emissions must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)(1)]

Emergency stationary RICE means any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, *etc.* Stationary CI ICE used for peak shaving are not considered emergency stationary ICE. Stationary CI ICE used to supply power to an electric grid or that supply non-emergency power as part of a financial arrangement with another entity are not considered to be emergency engines. Required testing of such units should be minimized, but there is no time limit on the use of emergency stationary RICE in emergency situations and for routine testing and maintenance. [§63.6675]

Emission Limitations:

None.

Operational Limitations:

1. At all times the permittee must operate and maintain the affected engine 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 including review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the engine. [§63.6605(b)]
2. The permittee must meet the following requirements (except during periods of engine startup): [§63.6603(a)]
 - a) Change the engine oil and oil filter every 500 hours of operation or annually, whichever comes first;
 - b) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
3. The Permittee shall only operate the engines within the following hour limitations: [§63.6640(f)]
 - a) Unlimited use in emergency situations. [§63.6603(f)(2)]

- b) 50 hours per year for any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations. [§63.6640(f)(1)]
- c) 100 hours per year for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The 50 hours allowed in 3.b) above count towards this 100 hour limitation. [§63.6640(f)(3) and §63.6603(f)(4)]
4. If the 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 above, 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. [§63.6603(a)]
5. During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)]
6. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements in 2.a), 2.b) and 2.c) of this condition. The oil analysis must be performed at every 500 hours of operation or annually. 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. [§63.6603(i)]
7. The permittee must install a non-resettable hour meter on this engine if one is not already installed. [§63.6625(f)]

Recordkeeping:

1. The permittee must keep the following records for this engine: [§63.6655(a)]
 - a) Records of the occurrence and duration of each malfunction of process equipment or any air pollution control and monitoring equipment and actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(2) and §63.6655(a)(5)]
 - b) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - c) Records that the engine was operated and maintained according to the manufacturer's emission-related operation and maintenance instructions or that a maintenance plan has been developed to provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6655(e)]

- d) Records of the hours of operation for the engine as measured by the non-resettable hour meter. The installation shall also maintain a recordkeeping form indicating out of the total hours measured by the meter: [§63.6655(f)]
 - i) How many hours were spent in emergency use and a brief description of the emergency situation.
 - ii) How many hours were spent in non-emergency operation.
- e) These records must be made available for inspection upon request by Missouri Department of Natural Resources' personnel. [§63.6660(a)]
- f) All records shall be maintained for five (5) years. [§63.6660(b)]
- g) Records shall be kept readily accessible in hard copy or electronic form. [§63.6660(c)]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report to the Missouri Department of Natural Resources' failure to perform the work practice on the schedule required under "Operational Limitations No. 2" due to Federal, State or local law under which the risk was deemed unacceptable. This report should be submitted with the semi-annual reporting required in No. 3 of this section. [§63.6650(f)]
3. The permittee shall report any deviations from the operational limitations, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit. These reports shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction. If there are no deviations from any operating limitations that apply, a statement that there were no deviations from the operating limitations during the reporting period must be included.

PERMIT CONDITION 025	
Emission Units F13 – F16 and T08A – T12A	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
Emission Unit	Description
F13	Emergency Diesel Fire Pump (Pond) - 475 kW
F14	Emergency Diesel Fire Pump (South) - 215 kW
F15	Emergency Diesel Fire Pump (East) - 305 kW
F16	Emergency Diesel Fire Pump (AD Warehouse) - 225 kW
T08A	Emergency Diesel Generator (Bldg. 10) - 800 kW
T09A	Emergency Diesel Generator (Bldg. 75 N) - 350 kW
T10A	Emergency Diesel Generator (Bldg. 75 S) - 800 kW
T11A	Emergency Diesel Generator (Bldg. 47) - 350 kW
T12A	Emergency Diesel Generator (Tank Farm) - 150 kW

Emission Limitations:

- No person shall cause or permit the emission into the atmosphere gases containing more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of these gases averaged on any consecutive three (3)-hour time period.
- No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99 th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

Monitoring/Record Keeping:

- The permittee shall maintain an accurate record of the sulfur content of fuel as fired.
- The permittee shall monitor the sulfur content of each delivery of fuel (fuel oil no. 2/diesel) documenting that the sulfur content never exceeds 0.5 percent. (Fuel sulfur content at or below 0.5 percent, i.e. 500 ppm, demonstrates compliance.)
- These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- Records may be kept in either written or electronic form.
- All records shall be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

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) 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 following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.
 - (B) Yard waste.
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) The Procter & Gamble Paper Products Company may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if The Procter & Gamble Paper Products Company fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full paper EIQ to the Air Pollution Control Program by no later than April 1st after the end of each reporting year. The permittee may instead submit a full electronic EIQ via MoEIS by no later than May 1st after the end of each reporting year.
- 5) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170

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

Emission Limitation:

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

Monitoring:

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
2. The permittee shall maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
 - c) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
 - d) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

1. The permittee shall document all readings on Attachment A, or its equivalent, noting the following:
 - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
 - b) Whether the visible emissions were normal for the installation.
 - c) Whether equipment malfunctions contributed to an exceedance.
 - d) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a Class I or Class II substance is stored or transported, all products containing a Class I substance, and all products directly manufactured with a Class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a Class I or Class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage
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- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

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

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

10 CSR 10-6.065(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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - 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.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7.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 semi-annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

10 CSR 10-6.065(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 semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's 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 application 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program 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
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- 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 application, 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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)12 Responsible Official

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

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources 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) The Missouri Department of Natural Resources 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) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

Attachment C
 Method 9 Opacity Emissions Observations

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

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation?

YES
 NO

 Signature of Observer

ATTACHMENT G
10 CSR 10-6.260 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission unit is in compliance with 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*.

Allowable SO_x emission limitation for indirect heating sources is 8 lb/MMBtu.

Emission Unit	Description	Fuel	Emission Factor	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)	Is the Emission Unit in compliance?
BOHO3	Boiler 3	Fuel Oil No. 2	14.4 lb/1000 gallons	0.1	8	Yes

The emission factors of 144S lbs/1000 gallons was taken from AP-42 Table 1.3-1, where S is the weight % of sulfur in the oil. S was taken to be 0.1 as the installation is limited to 0.1% sulfur content in the fuel oil combusted by this boiler in Special Condition 12 of Construction Permit No. 032003-041C.

The emission units meet the emission limitation without the use of a control device, therefore, CAM is not applicable.

ATTACHMENT H
 10 CSR 10-3.060 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*. Installation's Total Heat Input (Q) in MMBtu/hr:

Emission Unit	Description	MHDR (MMBtu/hr)
1GPR	5G Papermachine Process Equipment	
2GPR	6G Papermachine Process Equipment	
3GPR	7G Papermachine Process Equipment	
BOHO3	Natural Gas or Fuel Oil No.2 Fired Boiler 3	
BOHO4	Natural Gas Fired Boiler 4	
BOHO5	Natural Gas Fired Boiler 5	
SH	(2) Space Heaters	
Total Q		

Allowable PM emission limitation for new indirect heating source having an intermediate capacity between 10 MMBtu and 2,000 MMBtu:

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

$$E = 1.31(1052)^{-0.338} = 0.12 \text{ lb/MMBtu}$$

Emission Unit	Description	Emission Factor (lbs/MMscf)	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)	Is the Emission unit in compliance?
1GPR	5G Papermachine Process Equipment	11.5	0.01	0.12	YES
2GPR	6G Papermachine Process Equipment	11.5	0.01	0.12	YES
3GPR	7G Papermachine Process Equipment	11.5	0.01	0.12	YES
-	Space Heating	7.6	0.007	0.12	YES

Emission factors were taken from FIRE. The facility employs no control devices on these boilers. The calculations show that no further monitoring or record keeping is necessary because the emission units worst-case emissions are substantially lower than the applicable limit.

ATTACHMENT I
 10 CSR 10-6.400 Compliance Demonstration

Emission Unit	Description	MHDR (tons/hr)	PM Emission Factor (lb/ton)	Control Efficiency¹	Potential PM Emission Rate (lb/h)	PM Emission Limit (lb/h)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)
1GME	5G Papermachine YPDES		0.182	-			0.09	0.3
2GME	6G Papermachine YPDES		0.366	-			0.2	0.3

¹The PM Emission Factor is based upon stack testing performed on the emission units: 1GME on September 11, 2001 and 2GME on October 2, 2002. Although these emission units are listed within the 2009 EIQ as having control devices, the emissions units themselves are a particulate control device on the papermaking lines; therefore, the PM emission factor from the stack tests are uncontrolled.

Every emission unit is in compliance for both the PM rate emission limit and PM concentration emission limit. CAM is not applicable because the emission units meet the emission rate limitation without the aid of a control device.

STATEMENT OF BASIS

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 August 13, 2009;
- 2) 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.

10 CSR 10-6.100, *Alternate Emission Limits* is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.360, *Control of NO_x Emissions From Electric Generating Units and Non-Electric Generating Units* is not applicable to the installation. The installation does not operate a non-electric generating boiler with a maximum design heat input greater than two hundred fifty (250) million British thermal units per hour.

10 CSR 10-6.390, *Control of NO_x Emissions From Large Stationary Internal Combustion Engines* is not applicable to the installation. The installation does not operate a large stationary internal combustion engines with maximum design rate greater than one thousand three hundred (1,300) horsepower.

Construction Permits

Construction Permit No. 0877-003, Issued July 29, 1977:

- Vacuum system with a cyclone and baghouse.
- No special conditions.

Construction Permit No. 0278-003, Issued January 30, 1978:

- Four vacuum systems.
- No special conditions.

Construction Permit No. 0881-002A, Issued August 7, 1981:

- Construction of three modules.
- No special conditions.

Construction Permit No. 0585-003A, Issued April 27, 1985:

- Product alteration in processes D and E. Installation of several baghouses.
- No special conditions.

Construction Permit No. 0785-003, Issued May 29, 1985:

- Installation of process F and a baghouse.
- No special conditions.

Construction Permit No. 0487-010, Issued March 24, 1987:

- Modification of processes C and E. Installation of five baghouses on process C.
- Special Condition 1 requires stack testing on baghouses 4; 5; 9a; 10a; 11a; 12a; either 17a, 18a, 20a, or 21a; and either 22a, 23a, 24a, 25a, or 26a

Construction Permit No. 1292-017, Issued November 18, 1992:

- Delivery system for additional raw material.

No Construction Permit Required, Issued March 31, 1993:

- Reduction of emission points.

Construction Permit No. 0695-021, Issued June 15, 1995:

Construction Permit No. 0695-021A, Issued August 5, 1996:

- Addition of manufacturing capacity for process B, including the addition of a delivery system
- Amendment A removes testing conditions for 10 CSR 10-3.050.
- Special Conditions 1 through 4 have been applied within this permit (see Permit Condition 004).
- Special Condition 5 has been applied within this permit (see Permit Condition PW001).

Construction Permit No. 0198-037, Issued January 29, 1998:

- Installation of four new tissue/paper machines, stock preparation, three boilers, and finishing/converting operations.
- The special conditions of this permit were superseded by Construction Permit No. 032003-041C.

Construction Permit No. 1198-023, Issued November 27, 1998:

- Temporary permit to operate a 6 MMBtu/hr oil fired boiler.
- This permit expired November 16, 1999.

No Construction Permit Required, Issued December 31, 1998:

- Installation of a space heater.

No Construction Permit Required, Issued March 12, 1999:

- Emission control ductwork change.

Construction Permit No. 0999-020, Issued September 30, 1999:

- Installation of new diaper production lines.
- Special Conditions 1 through 3 have been applied within this permit (see Permit Conditions 005, 007, and 008).

Construction Permit No. 032002-009, Issued February 25, 2002:

- Installation of two converter drum filters, two mist eliminators, three emergency fire pumps, and five emergency diesel generators.
- Special Conditions 1 through 3 have been applied within this permit (see Permit Condition 022).

Construction Permit No. 042002-003, Issued March 6, 2002:

- Installation of additional diaper lines.
- Special Conditions 1 through 3 have been applied within this permit (see Permit Condition 009).

Construction Permit No. 102002-019, Issued October 31, 2002:

- Bleach usage.

Construction Permit No. 032003-041, Issued April 30, 2003:

Construction Permit No. 032003-041A, Issued September 8, 2004:

Construction Permit No. 032003-041B, Issued May 3, 2007:

Construction Permit No. 032003-041C, Issued October 30, 2009:

- Modification of Construction Permit No. 0198-0037 for construction of Phase II, installation of two new air handling units, an emergency generator, and four natural gas-fired space heaters.
- Amendment A extends the timeline within Special Condition 37 for the installation of Papermachine 8G.
- Amendment B removes CO PEMS/RATA requirements from Boilers 3, 4, and 5 from Special Conditions 21 and 22.
- Amendment C amends Special Condition 27 to account for an alternate operating scenario for the pre-dryers and Yankee Burner where the pre-dryer burners are turned off and the temperature of the Yankee hood burner is increased.
- Special Condition 1 has been applied within this permit (see Permit Condition 013).
- Special Condition 2 has been applied within this permit (see Permit Condition 014).
- Special Conditions 3 and 4 have been applied within this permit (see Permit Condition 011).
- Special Conditions 5 and 6 have been applied within this permit (see Permit Condition 012).
- Special Condition 7 has been applied within this permit (see Permit Condition 021).
- Special Condition 8 has been applied within this permit (see Permit Condition 016).
- Special Condition 9 has been applied within this permit (see Permit Condition 018).
- Special Condition 10 has been applied within this permit (see Permit Condition 016).
- Special Condition 11 has been applied within this permit (see Permit Condition 017).
- Special Conditions 12 through 17 have been applied within this permit (see Permit Condition 016).
- Special Condition 18 has been applied within this permit (see Permit Condition 018).
- Special Conditions 19 and 20 have been applied within this permit (see Permit Condition 016).
- Special Conditions 21 and 22 have not been applied within this permit. These conditions require a Predictive Emissions Monitoring System (PEMS) to monitor NO_x emissions from Boilers 3, 4, and 5 and annual Relative Accuracy Test Audits to ensure proper PEMS output. These

conditions were not included as the installation has opted to instead report emissions using a more accurate Continuous Emissions Monitoring System (CEMS). To ensure proper usage, maintenance, and calibration of the CEMS, conditions from 40 CFR Part 60, Subpart Db were included (see Permit Condition 018).

- Special Condition 23 has not been included within this permit. This special condition requires the initial performance testing to demonstrate compliance with Special Conditions 1 through 4, 8, 10, 11, 13 through 17, 19, and 20.
- Special Conditions 24 through 26 have been partially included within this permit. All of the initial performance tests have already been completed in compliance with Special Condition 23, so these requirements were not included in the permit; however, the requirements for conducting the annual stack tests to demonstrate compliance with Special Conditions 3, 4, and 11 have been included (see Permit Conditions 011 and 017).
- Special Condition 27 has been applied within this permit (see Permit Condition 012). Special Condition 27a was updated to include the operational range of the predryer burner augmenting air directional vanes of each papermachine when operating the predryer burners in conjunction with the Yankee burner.
- Special Conditions 28 through 32 have not been applied within this operating permit. These conditions contain the requirements for Post Construction Ozone Monitoring. This monitoring has been completed.
- Special Conditions 33 through 35: The wording of the conditions was changes slightly to reflect the fact that the emergency engine is a fire pump referred to as F16 rather than a generator referred to as T13A (see Permit Condition 023).
- Special Condition 36 has been applied within this permit (see Permit Condition PW002).
- Special Conditions 37 through 39 have not been applied within this permit. Installation of the 7G papermachine and Boiler No. 5 has already occurred. The installation has chosen not to install the 8G papermachine. Future implementation of Phase III construction will require a new/amended PSD permit as the deadline for construction under the current PSD permit has expired.
- Special Condition 40: The conditions of Construction Permit No. 032003-041C supersedes the conditions of Construction Permit No. 0198-037; therefore, the conditions of Construction Permit No. 0198-037 have not been applied within this permit.

Construction Permit No. 112004-010, Issued November 23, 2004:

- Installation of four new diaper lines and one absorbent delivery system.
- Special Conditions 1 through 3 have been applied within this permit (see Permit Condition 002). The new absorbent delivery system had emissions routed to Emission Unit 37A AGM FR15 – FR 18 (Already required to operate a baghouse under Construction Permit No. 042002-003, Special Condition 1) while the new diaper lines emissions were routed to Emission Unit 02A A Module Dust Control

Construction Permit No. 052006-004, Issued May 3, 2006:

- Installation of three new diaper lines.
- Removal of 19A L24 Cmod PA1 and L24 Cmod PV.
- 42A – Diaper Lines 70, 71, and 72 controlled by baghouses 66, 67, and 68 was never installed; therefore, Special Condition 1 was not included within this operating permit.

Construction Permit No. 052007-011, Issued May 29, 2007:

Construction Permit No. 052007-011A, Issued December 22, 2008:

- Modification of the 5G, 6G, and 7G Papermachines to increase the capacity of the forming and drying sections.
- Amendment A allows the permittee to operate the papermachines for up to four hours after a scrubber malfunction.
- Special Condition 1 has not been included within this permit. This requirement was for stack testing of the 6G or 7G papermachines to quantify particulate emissions. This testing as been completed.
- Special Condition 2 has been applied within this permit (see Permit Condition 013).
- Special Condition 3 has been applied within this permit (see Permit Condition 014).

Construction Permit No. 032008-008, Issued March 14, 2008:

- Installation of a new diaper line.
- Special Condition 1 has not been included within this permit. This requirement was for stack testing of 43A Building 11 Central Dust Receiver (ECD69) and 44A AZO-AGM Final Filter to quantify particulate emissions. This testing as been completed.
- Special Condition 2 has been applied within this permit (see Permit Condition 006).

Construction Permit No. 072008-012, Issued July 30, 2008:

- Modification of 8 diaper lines to increase line productivity.
- Special Condition 1 has not been included within this permit. This requirement was for stack testing of 03A, 08A, 11A, and 24A through 38A to quantify particulate emissions and baghouse/drum filter control efficiencies. This testing as been completed.
- Special Condition 2 has been applied within this permit (see Permit Condition 003). This requirement was for the operation of baghouses, drum filters, and filter receivers by 02A, 03A, 08A, 11A, and 24A through 38A. This same condition can be found in earlier construction permits for some of the units and therefore wasn't applied within this permit as baghouses, drumer filters, and/or filter receivers are already required by:
 - 02A – Permit Condition 002
 - 08A and 11A – Permit Condition 004
 - 24A through 36A – Permit Conditions 005, 007, and 008
 - 37A and 38A – Permit Condition 009.

No Construction Permit Required, Issued July 31, 2009:

- Removal of existing baghouses ECD29 (16A) and ECD35 (23A). Emissions from these points are now routed into the existing baghouse ECD03 and reported under the existing emission point 18A.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* is applicable to the installation but has not been applied within this permit. Due to the date of their installation the only applicable requirements for natural gas fired boilers BOHO3, BOHO4, and BOHO5 are the NO_x emission standards, none of the SO₂, PM, or opacity limitations are applicable. The 40 CFR 60.44b(1)(1) NO_x emission standards are less restrictive than the BACT NO_x emission

limits within Construction Permit No. 032003-041C for all periods of operation greater than or equal to ten percent capacity. The physical minimum operating capacity of the boilers is ten percent; therefore, compliance with the construction permit limitation demonstrates compliance with NSPS Db. Wording from NSPS Db regarding the proper usage, maintenance, and calibration of a NO_x CEMS was incorporated into Permit Condition 018 as the installation has chosen to use a NO_x CEMS rather than their construction permit required NO_x PEMS (this is allowed as continuous emissions monitoring systems are more accurate than predictive emissions monitoring systems).

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is applicable to the installation and has been applied within this permit. Boiler 3 is subject to NSPS Dc rather than NSPS Db while combusting fuel oil due to the fuel oil delivery system physically limiting the boiler to producing 32,000-35,000 lbs/hr of steam (~40 MMBtu/hr).

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*, is not applicable to the installation. All of the storage tanks at the installation are either below the 19,813 gallons threshold or contain diesel which has a true vapor pressure below 15.0 kPa..

40 CFR Part 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is not applicable to this installation. All of the CI ICE are emergency diesel generators, the newest of which was constructed in 2001, prior to the statutory dates listed within the regulation.

Maximum Achievable Control Technology (MACT) Applicability

This facility has a 10/25 HAP limit and is, therefore, an area source for HAPs.

40 CFR Part 63, Subpart S – *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry* is not applicable to the installation. This subpart is not applicable to area sources.

40 CFR Part 63, Subpart ZZZZ - *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is applicable to this installation and has been applied within this permit (see Permit Condition 024).

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters* has been vacated by court action. If a new version of this rule is promulgated and is applicable to the installation, the installation shall apply for a modification to this permit to include the applicable requirements.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

In the previous operating permit (OP2005-007) issued to this installation the Statement of Basis stated that Emission Units 2A A Module Dust Control, 3A B Module OLBH, 8A North Plant Dust Receiver (NPDR), 11A B Module Dust Control, 15A D Module Central Vac, 24A South Plant Dust Receiver (SPDR), 25A D Module CSX1 Dust Control, 34A D Module CSX2 Dust Control, 35A AGM FR1 – FR4, 36A AGM FR5 – FR8, and 38A AGM FR11 – FR14 were subject to CAM and were required to submit a CAM Plan with their Part 70 Operating Permit Renewal Application. The installation did submit the CAM Plan as required, but during the CAM Plan review it was determined that these emission units are no longer CAM eligible.

The installation was issued a construction permit on July 30, 2008, to modify their diaper lines and increase production, in this construction permit (072008-012) the installation was required to perform stack testing on these emission units to determine control device efficiency, required to operate the control devices to control particulate emissions, required to monitor and record the operating pressure drop across the control devices at least once each operating day, and required to maintain operation and maintenance logs on the emission units and control devices. As these requirements are federally enforceable conditions within the construction permit, the control devices are now included within the Potential to Emit per the definition of Potential to Emit at §70.2; therefore, the emission units now have potential emissions below 100 tons/yr and are not CAM applicable.

Greenhouse Gas Emissions

This installation is a major source for greenhouse gases. Major stationary sources are required by the Clean Air Act (CAA) to obtain Part 70 operating permits. While Part 70 permits generally do not establish new emissions limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020(2)(A)23, into a comprehensive air permit. At the time of permit issuance, there were no applicable GHG requirements for this source.

Note that this source is subject to 40 CFR Part 98 - *Mandatory Greenhouse Gas Reporting Rule*; however, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. An estimate of CO₂ emissions have been included within the installation's updated potential to emit (see the Other Regulatory Determinations Section within this Statement of Basis). The applicant is required to report CO₂ emissions data directly to EPA.

Other Regulatory Determinations

The minimum operating pressure drops across the control devices listed within Permit Conditions 002 through 009 were obtained from the manufacturer's specifications for the baghouses and drum filters. Manufacturers include: Osprey, MAC, Donaldson, Flex-Kleen, Focke & Co., JOA, and Azo. These control devices were exempted from the minimum pressure drop for the first 48 hours after bag/filter replacement. The installation has had trouble meeting the minimum pressure during this time period as the new bag/filter has not had sufficient operating time to develop a cake to increase the pressure drop across the control device.

The following emission units have been removed from the installation:

Emission Unit	Description
EP-19A	L24 Cmod PA1 and L24 Cmod PV

There has been some confusion in the past regarding Emission Unit F16 Emergency Diesel Fire Pump (AD Warehouse) – 225 kW, in construction permits and emission inventory questionnaires this emission unit was referred to as T13A Emergency Diesel Generator – 216 kW; however, the emission unit is a fire pump and not a generator.

10 CSR 10-3.060 *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating* is applicable to the installation and has been applied within this permit (see Permit Condition 010). Attachment H contains calculations demonstrating the compliance for indirect heating sources 1GPR, 2GPR, and 3 GPR. Indirect heating sources BOHO3, BOHO4, and BOHO5 are subject to this regulation, but their compliance was not included within Attachment H. Construction Permit No. 032003-041B limits BOHO3, BOHO4, and BOHO5 to 0.007 lbs PM₁₀/MMBtu while burning natural gas and limits BOHO3 to 0.05 lbs PM₁₀/MMBtu while burning fuel oil; these limits are much lower than the 0.12 lbs PM₁₀/MMBtu limit calculated by this rule and compliance has been demonstrated through stack testing.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Condition 001). The following sources of visible air contaminants are subject to the rule, but while being properly maintained and operated, are not expected to exceed the opacity limit as their potential emissions of particulate are below 0.5 lbs/hr; therefore, no monitoring, recordkeeping, or reporting requirements for these units have been included within the permit:

Emission Unit	Description	Emission Unit	Description
03A	B Module OLBH	33A	FSC DF8
08A	North Plant Dust Receiver (NPDR)	34A	D Module CSX2 Dust Control
11A	B Module Dust Control	35A	AGM FR1 - FR4
15A	D Module Central Vac	36A	AGM FR5 - FR8
18A	A, B, & C Module Central Vac	37A	AGM FR15 - FR18
22A	Lines 62 - 69 Final Filter	38A	AGM FR11 - FR14
24A	South Plant Dust Receiver (SPDR)	AHU1	Air Handling Unit #1
25A	D Module CSX1 Dust Control	AHU2	Air Handling Unit #2
26A	FSC DF1	AHU3	Air Handling Unit #3
27A	FSC DF2	AHU4	Air Handling Unit #4
28A	FSC DF3	AHU5	Air Handling Unit #5
29A	FSC DF4	AHU6	Air Handling Unit #6
30A	FSC DF5	AHU7	Air Handling Unit # 7
31A	FSC DF6	SH	Space Heaters – (2) 8.5 MMBtu/hr, Natural Gas
32A	FSC DF7		

The following visible air contaminant emission sources are internal combustion engines exempt from this regulation per 10 CSR 10-6.220(1)(A):

Emission Unit	Description
F13	Emergency Diesel Fire Pump (Pond) - 475 kW
F14	Emergency Diesel Fire Pump (South) - 215 kW
F15	Emergency Diesel Fire Pump (East) - 305 kW
F16	Emergency Diesel Fire Pump (AD Warehouse) - 225 kW
T08A	Emergency Diesel Generator (Bldg. 10) - 800 kW
T09A	Emergency Diesel Generator (Bldg. 75 N) - 350 kW
T10A	Emergency Diesel Generator (Bldg. 75 S) - 800 kW
T11A	Emergency Diesel Generator (Bldg. 47) - 350 kW
T12A	Emergency Diesel Generator (Tank Farm) - 150 kW

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is applicable to the installation and has been applied within this permit (see Permit Conditions 019 and 025). The following SO_x emission sources only combust natural gas exempting them from this regulation per 10 CSR 10-6.260(1)(A)2:

Emission Unit	Description	Emission Unit	Description
1GPR	5G Papermachine Process Equipment	BOHO4	Natural Gas Fired Boiler 4
2GPR	6G Papermachine Process Equipment	BOHO5	Natural Gas Fired Boiler 5
3GPR	7G Papermachine Process Equipment		

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* is applicable to the installation and has been applied within this permit (see Permit Condition 015). The following particulate emission sources have potential emissions below 0.5 lbs/hr and are exempt per 10 CSR 10-6.400(1)(B)12:

Emission Unit	Description	Emission Unit	Description
03A	B Module OLBH	37A	AGM FR15 - FR18
08A	North Plant Dust Receiver (NPDR)	38A	AGM FR11 - FR14
11A	B Module Dust Control	AHU1	Air Handling Unit #1
15A	D Module Central Vac	AHU2	Air Handling Unit #2
18A	A, B, & C Module Central Vac	AHU3	Air Handling Unit #3
22A	Lines 62 - 69 Final Filter	AHU4	Air Handling Unit #4
24A	South Plant Dust Receiver (SPDR)	AHU5	Air Handling Unit #5
25A	D Module CSX1 Dust Control	AHU6	Air Handling Unit #6
26A	FSC DF1	AHU7	Air Handling Unit # 7
27A	FSC DF2	F13	Emergency Fire Pump (Pond) - 475 kW
28A	FSC DF3	F14	Emergency Fire Pump (South) - 215 kW
29A	FSC DF4	F15	Emergency Fire Pump (East) - 305 kW
30A	FSC DF5	F16	Emergency Fire Pump (AD Warehouse) - 225 kW
31A	FSC DF6	T08A	Emergency Generator (Bldg. 10) - 800 kW
32A	FSC DF7	T09A	Emergency Generator (Bldg. 75 N) - 350 kW
33A	FSC DF8	T10A	Emergency Generator (Bldg. 75 S) - 800 kW
34A	D Module CSX2 Dust Control	T11A	Emergency Generator (Bldg. 47) - 350 kW
35A	AGM FR1 - FR4	T12A	Emergency Generator (Tank Farm) - 150 kW
36A	AGM FR5 - FR8	SH	Space Heaters – (2) 8.5 MMBtu/hr, Natural Gas

The following particulate emission sources are indirect heating sources exempt from this regulation per 10 CSR 10-6.400(1)(B)6:

Emission Unit	Description	Emission Unit	Description
1GPR	5G Papermachine Process Equipment	BOHO3	Natural Gas or Fuel Oil No.2 Fired Boiler 3
2GPR	6G Papermachine Process Equipment	BOHO4	Natural Gas Fired Boiler 4
3GPR	7G Papermachine Process Equipment	BOHO5	Natural Gas Fired Boiler 5

The following particulate emission sources are required by a federally enforceable condition (construction permit special condition) to operate a particulate control device with an efficiency of at least ninety percent (90%) and are exempt per 10 CSR 10-6.400(1)(B)15:

Emission Unit	Description	Control Device No.
02A	A Module Dust Control	ECD 30 and 37 Baghouses – Focke & Co.
43A	Building 11 Central Dust Receiver	ECD 69 Baghouse - MAC
1GDE	5G Dry End	C2 – Venturi Scrubber
2GDE	6G Dry End	C4 – Venturi Scrubber
3GDE	7G Dry End	C6 – Venturi Scrubber
1GFR	5G Papermachine Former Equipment	C1 – Cyclonic Separator
2GFR	6G Papermachine Former Equipment	C3 – Cyclonic Separator
3GFR	7G Papermachine Former Equipment	C5 – Cyclonic Separator

An updated Potential to Emit for the installation is shown in the table below:

Pollutant	Potential to Emit (tons/yr) ¹
CO	719.00
CO _{2e}	527,893.69
HAP	9.51
NO _x	406.88
PM ₁₀	449.20
PM _{2.5}	73.45
SO _x	93.51
VOC	733.49

¹Potential emissions are based upon 8,760 annual hours of uncontrolled operation unless otherwise noted:

- F13, F14, F15, T08A, T09A, T10A, T11A, and T12A were evaluated at 500 annual hours of operation per construction permit no. 032002-009.
- F16 was evaluated at 500 annual hours of operation per construction permit no. 032003-041C.
- 1GFR, 2GFR, and 3GFR were evaluated with 90% cyclone particulate control per construction permit no. 032003-041C.
- 1GDE, 2GDE, and 3GDE were evaluated with 95% venturi scrubber particulate control per construction permit no. 032003-041C.
- 43A was evaluated with 99.8% baghouse particulate control per construction permit no. 032008-008.
- 37A and 38A were evaluated with 99.8% baghouse particulate control per construction permit no. 042002-003.
- 08A, 11A, 15A, 18A, and 22A were evaluated with 99.8% baghouse particulate control per construction permit no. 0695-021A.
- 03A was evaluated with 99.8% baghouse particulate control per construction permit no. 072008-012.
- 24A, 35A, and 36A were evaluated with 99.8% baghouse particulate control per construction permit no. 0999-020.
- 25A, 26A, 27A, 28A, 29A, 30A, 31A, 32A, 33A, and 34A were evaluated with 98.8% drum filter particulate control per construction permit no. 0999-020.
- 02A was evaluated with 99% baghouse particulate control per by construction permit no. 112004-010.
- Potential emissions of HAP are limited by Permit Condition PW003 to 10 tons/yr of each HAP individually and 25 tons/yr of combined HAPs. The majority of HAP emissions are reported under VOCFUG.

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

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

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

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

Prepared by:

Alana L. Rugen
Environmental Engineer

CERTIFIED MAIL: 70093410000190189480
RETURN RECEIPT REQUESTED

Mr. Marc Schoch
The Procter & Gamble Paper Products Company
PO Box 400
Cape Girardeau, MO 63701

Re: The Procter & Gamble Paper Products Company, 031-0053
Permit Number: **OP2011-013**

Dear Mr. Schoch:

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.

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 Alana Rugen at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:ark

Enclosures

c: Southeast Regional Office
PAMS File: 2009-08-023