



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2013-072
Expiration Date: DEC 17 2018
Installation ID: 510-0057
Project Number: 2011-05-050

Installation Name and Address

Procter & Gamble Manufacturing Company
169 East Grand Avenue
St. Louis, MO 63147-3123
City of St. Louis

Parent Company's Name and Address

The Procter & Gamble Company
1 Procter & Gamble Plaza
Cincinnati, OH 45202

Installation Description:

The Procter & Gamble Manufacturing Company (P&G) operates HomeCare product lines manufacturing plant at 169 East Grand Avenue, St. Louis, Missouri 63147. P&G manufactures cleaning products, such as Comet cleaner, Cascade dishwashing detergent, Febreze, Mr. Clean and Swiffer Wet Jet. The installation's main processes are receiving raw materials by truck and rail, storing dry and liquid materials, blending, and drying materials into final products and packaging and shipping. The installation operates numerous storage tanks and silos, mixers, dryers, five parts washers and two natural gas-fired boilers with Fuel Oil No. 2 as backup.

P&G is a major source of particulate matter less than or equal to ten microns (PM-10). The installation has accepted voluntary, federally enforceable emission limitations limiting PM-10 emissions to less than major source level to qualify for this permit.

DEC 17 2013

Effective Date


Director or Designee

Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The Procter & Gamble Manufacturing Company (P&G) operates HomeCare product lines manufacturing plant at 169 East Grand Avenue, St. Louis, Missouri 63147. P&G manufactures cleaning products, such as Comet cleaner, Cascade dishwashing detergent, Febreze, Mr. Clean and Swiffer Wet Jet. The installation's main processes are receiving raw materials by truck and rail, storing dry and liquid materials, blending, and drying materials into final products and packaging and shipping. The installation operates numerous storage tanks and silos, mixers, dryers, five parts washers and two natural gas-fired boilers with Fuel Oil No. 2 as backup.

P&G is a major source of particulate matter less than or equal to ten microns (PM-10). The installation has accepted voluntary, federally enforceable emission limitations limiting PM-10 emissions to less than major source level to qualify for this permit.

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

Reported Air Pollutant Emissions, tons per year					
Pollutants	2012	2011	2010	2009	2008
Particulate Matter ≤ Ten Microns (PM ₁₀)	30.42	30.42	47.73	47.03	47.35
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	30.37	30.37	46.98	46.98	47.34
Sulfur Oxides (SO _x)	0.21	0.21	0.21	0.21	0.73
Nitrogen Oxides (NO _x)	12.78	12.78	12.79	12.78	11.90
Volatile Organic Compounds (VOC)	2.89	2.89	3.05	3.05	0.64
Carbon Monoxide (CO)	10.71	10.71	10.72	10.71	9.89
Lead (Pb)	—	—	—	—	—
Hazardous Air Pollutants (HAPs)	0.23	0.23	0.24	0.23	0.22
Ammonia (NH ₃)	0.40	0.40	0.41	0.40	0.38

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU101	Phosphate Rail Car Unloading
EU102	Phosphate Truck Unloading
EU103	Carbonate Rail Car Unloading
EU106	Carbonate Truck Unloading
EU112	Sulfate Storage Silo
EU126	Pomerzest Perfume Use Tank
EU127	Perfume Use Tank
EU128	Fluid Bed Baghouse
EU129	Carbonate Use Bin-North
EU135	Packing Line 21
EU136	Packing Line 22
EU137	Packing Line 23
EU138	Packing Line 20
EU144	South Perborate Admix Receiver Use Bin
EU145	Perborate Storage Silo
EU146	North Perborate Admix Receiver Use Bin
EU149	Start-up Reblend Bin
EU151	Powder Silo Storage System/Old Packing Filter
EU152	North Making Filter
EU154	Fifth Filter/Enzyme Filter
EU155	Packing Central Vacuum System (CVC)
EU157	Carton Riddling Filter
EU158	Process Central Vacuum System
EU167	Liquiblu 4 Perfume Use Tank
EU168	Cliff/Freefall Perfume Use Tank
EU174	DPG Perfume Storage Tank
EU178	Line 14 Seal Clean
EU180	Line 10 Platen Vac
EU181	Line 10 Seal Clean
EU182	Line 14 Platen Vac
EU183	MDGA Silo - Storage Silo #1
EU184	Citrate Silo - Storage Silo #2
EU185	MDGA FRL – Hold Bin #1
EU186	Citrate FRL – Hold Bin #2
EU187	North Sulfate FRL – Hold Bin #3
EU188	South Sulfate FRL – Hold Bin #4
EU189	Dump Hopper #1 & #2/Hold Bin/Use Bin – Accusol/Disil
EU190	Bulk Loading System
EU191	Bulk Unloading System

Emission Unit #	Description of Emission Unit
EU401	Tank #33901, Underground Ethanol Storage Tank
EU418	Solution Premix Tank
EU445	C8-10, E6 Storage Tank
EU447	CBS Base Storage Tank
EU449	AMB-15 Storage Tank
EU450	AE21 Storage Tank
EU451	Propylene Glycol Storage Tank
EU452	CNFA (Coconut Fatty Acid) Storage Tank
EU453	BPP Storage Tank
EU454	Coconut Fatty Acid Storage Tank
EU455	Neodol 91-8 Storage Tank
EU457	Tote Tank - Perfume Storage
EU460	C24-5 Surfactant Storage Tank
EU461	HPBCD Cyclodextrin Storage Tank
EU462	Sodium Benzoate Storage Tank
EU464	Effluent Tank
EU465	Line 3 Finished Product Tank
EU466	Line 4 Finished Product Tank
EU467	Liquid Gel Effluent
EU468	Sodium Hypochlorite Solution Storage Tanks
EU485	Sodium Carbonate/Soda Ash Slurry Storage Tank
EU494	Line 6 Storage Tank
EU495	Line 7 Storage Tank
EU501	Phosphate Transfer Filter
EU502	Carbonate Silo Filter
EU503	Carbonate 3 rd Filter for Use Bin
EU509	Perfume Tank
EU510	Uniquat Tank
EU511	PNB Tank
EU512	Pre-Mix Batch Tank
EU513	Swiffer Finished Product Storage Tank
EU603	Boiler #3
EU604	Boiler #4
EU605	Parts Washers

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU113	Liquid Silicate Tank, 45,500 Gallon Capacity
EU114	Surfactant-Acusol Storage Tank, 45,500 Gallon Capacity
EU115	Timeline Perfume Storage tank, 5,000 Gallon Capacity
EU116	Liqiblue 4 Perfume Underground Storage Tank, 5,000 Gallon Capacity
EU117	Pomerzest Perfume Underground Storage Tank, 5,000 Gallon Capacity
EU118	SLF 18 Tank, 45,500 Gallon Capacity
EU130	Fluid Bed Fines Receiver Filter
EU156	Trash Compactor
EU170	Lighthouse Rotoclone
EU175	Seal Clean Dust Control for Lighthouse
EU195	Line 15 Platen VAC with Integral Baghouse
EU196	Line 15 Seal Clean with Integral Baghouse
EU197	Line 12 Platen VAC with Integral Baghouse
EU198	Line 12 Seal Clean with Integral Baghouse
EU209	Pine Perfume Addition Process Tank, 400 Gallon Capacity
EU405	Cumene AG (Sodium Cumene Sulfonate) Tank, Tank #33201, 45,500 Gallon Capacity
EU407	Sodium Silicate Storage Tank, Tank #33203, 45,500 Gallon Capacity
EU409	Gel Base Storage Tank, Tank #33400, 51,000 Gallon Capacity
EU410	Main Mixing Tank, Tank #35000, 9,700 Gallon Capacity
EU411	Gel Base Storage Tank, Tank #35400, 51,000 Gallon Capacity
EU414	Finished Product (2 X Base) Storage Tank, Tank #35521, 51,000 Gallon Capacity
EU415	Finished Product (Canadian Bath) Storage Tank, Tank #35531, 51,000 Gallon Capacity
EU417	Mr. Clean Lemon Color Mix Tank, Tank #33501, 1,600 Gallon Capacity
EU419	Mr. Clean Mix Tank, Tank #33601, 250 Gallon Capacity
EU420	MC Spring Fresh Color Mix Tank, Tank #33611, 250 Gallon Capacity
EU426	Ammonia Storage Tank, Tank #34808, 10,500 Gallon Capacity
EU428	KOH Storage Tank, Tank #34502, 12,500 Gallon Capacity
EU429	Polyacrylic Acid Storage Tank, Tank #34922, 400 Gallon Capacity
EU430	Silwet Perfume Storage Tank, Tank #34910, 500 Gallon Capacity
EU431	SSL Pine Perfume/Sparkling Apple Perfume Storage Tank, Tank #34912, 400 Gallon Capacity
EU432	Top Job/Citrus Apple Perfume Storage Tank, Tank #34918, 400 Gallon Capacity
EU433	Lemovert/MCL Perfume Storage Tank, Tank #34915, 400 Gallon Capacity
EU434	C12 AS Sodium Lauryl Sulfate Storage Tank, Tank #34402, 16,300 Gallon Capacity
EU439	Comet Bath Spray Storage Tank, Tank #9197, 65,700 Gallon Capacity

Emission Unit #	Description of Emission Unit
EU444	DEG Storage Tank, Tank #33101, 12,500 Gallon Capacity
EU446	Effluent Reclaim Tank, Tank #35533, 9,200 Gallon Capacity
EU448	Citric Acid Solution Storage Tank, Tank #33113, 15,200 Gallon Capacity
EU452	CNFA (Coconut Fatty Acid) Storage Tank
EU457	Perfume Storage Tote
EU458	DEG Storage Tank, Tank #34934, 500 Gallon Capacity
EU469	Prism Perfume Storage Tank, Tank #71200, 280 Gallon Capacity
EU470	BSFS/Niagara; Orchard Splash Perfume Storage Tote, Tank #71300, 280 Gallon Capacity
EU471	Nitric Acid Tank with Scrubber, Tank #70100, 280 Gallon Capacity
EU484	Caustic Soda Storage Tank, Tank #34302, 15,000 Gallon Capacity
EU486	DTPA Storage Tote, Tank #34900, 500 Gallon Capacity
EU487	Artica Perfume Storage Tote, Tank #34440, 280 Gallon Capacity
EU488	Moonstar Perfume Storage Tote, Tank #34931, 280 Gallon Capacity
EU489	CBS(Valencia) Perfume Tote, Tank # 34940, 500 Gallon Capacity
EU490	WHIM MCMF Perfume Storage Tote, Tank #34937, 500 Gallon Capacity
EU491	Pine MCP/SSP Perfume Tote, Tank #34946, 500 Gallon Capacity
EU492	Pine MCP/SSP Perfume Tote, Tank #34943, 500 Gallon Capacity
EU493	Deionized Water Tank, Tank #34103, 500 Gallon Capacity
EU500	Mr. Breeze Color Mix Tank, Tank #33620, 250 Gallon Capacity
EU504	Polymer Filter Tote, Tank #33123, 280 Gallon Capacity
EU505	Polymer Premix Tank (Drum)
EU506	Tote; Bardac 2250; 280 Gallon Capacity
EU507	Febreze Reblend Tank, Tank #101001
EU508	Febreze Reblend Tank, Tank #101002
EU516	Liquid Sodium Sulfate Use Bin with Integral Baghouse
EU602	No. 2 Fuel Oil Tank Truck Storage (parking area)

II. Plant Wide Emission Limitations

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

Permit Condition PW001

10 CSR 10-6.065 Operating Permits

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

Emission Limitation:

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

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of emissions of PM₁₀ emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the PM₁₀ emissions from this installation.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

Permit Condition PW002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20 percent.
- 2) Exception:
 - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40 percent opacity.
 - b) A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

Monitoring:

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment B)
- 3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

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

III. Emission Unit Specific Emission Limitations

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

EU101, EU102, EU103 and EU106 – Phosphate and Carbonate Silos Unloading Operations	
<ul style="list-style-type: none"> Each loading method has a dedicated baghouse. These baghouses recover carbonate and phosphate particles. The baghouses are inherent to the phosphate and carbonate unloading/loading operation. 	
Emission Unit	Description
EU101	Railcar unloading of phosphate (STPA) to Silo. Phosphate dust from unloading process is captured and re-blended using Flex-Kleen 84 CTR 64-M-51 bag filter (CD103-018)
EU102	Truck unloading of STPA to Silo (backup only). Phosphate dust from unloading process is captured and re-blended using Flex-Kleen 100-BV-25 bag filter (CD108-018)
EU103	Railcar unloading of carbonate to Silo. Carbonate dust from unloading process is captured and re-blended using Flex-Kleen 84 CTR 64-M-51 bag filter (CD109-018)
EU106	Truck unloading of carbonate to Silo (backup only). Carbonate dust from unloading process is captured and re-blended using Flex-Kleen 100-BV-25 bag filter (CD110-018)

<p>Permit Condition EU101-001 through EU103-001 and EU106-001</p> <p>10 CSR 10-6.060 Construction Permits Required St. Louis City APCP Construction Permit No. 06-04-007</p> <p>10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes</p>
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Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of:
 - a) 30.51 pounds per hour (lb/hr) from EU101 or EU102; and
 - b) 28.23 lb/hr from EU103 or EU106.
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

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

Operational Limitation:

The permittee shall only unload carbonate and phosphate into the silos when the baghouses for each unloading process (railcar or truck) are operating properly.

[Construction Permit 00-11-047, Section II: B]

Monitoring/Recordkeeping/Reporting:

Not required (See Statement of Basis – bag filters are inherent part of the processes)

EU112 – Sulfate Storage Silo	
Emission Unit	Description
EU112	Sulfate Storage Silo, including two (2) bucket elevators and seven (7) screw conveyors with Flex-Kleen 84-BTR-36II bag filter (CD111-018)

Permit Condition EU112-001
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 16.51 pounds per hour (lb/hr) from EU112.
- 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/Recordkeeping/Reporting:

Not required (See Statement of Basis – bag filters are inherent part of the processes)

EU126, EU127, EU167 and EU168 – Perfume Use Tanks.	
Emission Unit	Description
EU126	Pomerzed Perfume Use Tank – Tank 126, 71 Gallon Capacity
EU127	Timeline Perfume Use Tank – Tank 127, 71 Gallon Capacity
EU167	Liquiblue 4 Perfume Use Tank – Tank 167, 71 Gallon Capacity
EU168	Cliffhanger Perfume Use Tank – Tank 168, 71 Gallon Capacity

Permit Condition EU126-001, EU127-001, EU167-001 and EU168-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City Air Pollution Control Program Construction Permit No. 01-05-009

Emission Limitation:

Perfume throughput for tanks 126, 127, 167 and 168 shall be limited 85,730 gallons each in any consecutive 12-month period. [Construction Permit 01-05-009, Section II]

Monitoring/Recordkeeping:

[Construction Permit 01-05-009, Section IV]

- 1) Monthly records of perfume throughput shall be kept for all tanks.
- 2) Maintenance records for the equipment shall be kept. The facility shall also keep a record of any spills of more than a reportable quantity (20 gallons or greater), including all reporting and corrective actions taken.
- 3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

EU128 – Fluid Bed Dryer EU129 – Carbonate Use Bin North	
Emission Unit	Description
EU128	Fluid Bed Dryer to baghouse Ultra Ind NWD-1729-120 III (CD113-018)
EU129	Carbonate Use Bin - Transfer of NaCO ₃ / CNP/NaCO ₃ with Ultra Ind SQ-100-8 bag filter (CD116-018)

Permit Condition EU128-001 and EU129-001
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of:
 - a) 36.38 lb/hr from EU128 and
 - b) 13.62 lb/hr from EU129.
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

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

Monitoring:

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

- 1) The baghouses shall be maintained such that the pressure drop remains in the normal operating range (2.0 inches of water to 8.0 inches of water), whenever the emission unit(s) is in operation. A pressure drop reading of less than two inches may be observed for a period following the installation of a new bag.
- 2) All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacturer’s specifications and recommendations.
- 3) Check and document the baghouses’ pressure drop weekly, whenever the emission unit(s) is in operation. If the pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal.
- 4) Check and document the cleaning sequence of the dust collector every six months.
- 5) Inspect bags for leaks and wear every six months.
- 6) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months.

Recordkeeping:

- 1) The permittee shall maintain records to verify compliance with the baghouse monitoring. These records shall include weekly baghouse pressure drop indicator readings and all dates of filter replacement, and all baghouse instrumentation calibrations (see Attachments C and D).
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten days after the permittee determined that the unit(s) deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the operating pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU135, EU136, EU137 and EU138 – Cascade Packaging Lines.	
Emission Unit	Description
EU135	Packing Line 21 - Surge bins, tub fill, sifter, super sack fill, and emergency pump. Control Device - Flex-Kleen 100-WSWC-225-111 Baghouse (CD135-018)
EU136	Packing Line 22 - Surge bins, tub fill, sifter, super sack fill, and emergency pump. Control Device - Flex-Kleen 100-WSWC-225-111 Baghouse (CD136-018)
EU137	Packaging Line 23 - Surge bins, tub fill, sifter, super sack fill, and emergency pump Control Device - Flex-Kleen 100-WSWC-225-111 Baghouse (CD137-018)
EU138	Packaging line 20 - Surge bins, tub fill, sifter, super sack fill, and emergency pump Control Device - Flex-Kleen 100-WSWC-225-111 Baghouse (CD134-018)

Permit Condition EU135-001, EU136-001, EU137-001 and EU138-001

10 CSR 10-6.060 Construction Permits Required

St. Louis City APCP Construction Permit No. 02-10-021

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) Cascade packaging lines 135, 136, 137 and 138 shall not exceed 225,000 tons of combined throughput in any consecutive 12-month period.
[Construction Permit 02-10-0219, Section II: A.]
- 2) The permittee shall not emit particulate matter in excess of:
 - a) 16.65 lb/hr from EU135;
 - b) 15.39 lb/hr from EU136;
 - c) 15.10 lb/hr from EU137; and
 - d) 17.87 lb/hr from EU 138
- 3) 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:

[Construction Permit 02-10-021, Section III: Conditions]

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

- 1) The baghouses shall be maintained such that the pressure drop remains in the normal operating range (3.0 inches of water to 5.0 inches of water), whenever the emission unit(s) is in operation. A pressure drop reading of less than three inches may be observed for a period following the installation of a new bag.
- 2) Conduct and document a quarterly inspection of the baghouse for leaks and wear, and of the cleaning sequences of baghouse.

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

Recordkeeping:

- 1) The permittee shall calculate and record the combined packaging lines' throughput on a monthly basis by the fifteenth (15th) of the following month.
- 2) The permittee shall maintain records to verify compliance with the baghouse monitoring. These records shall include weekly baghouse pressure drop indicator readings and all dates of filter replacement, and all baghouse instrumentation calibrations (see Attachments C and D).
- 3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten days after the permittee determined that the unit(s) exceeded the through limitation or deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the operating pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU144, EU145, EU146 and EU149 – Cascade Raw Material Receiving and Transferring.	
Emission Unit	Description
EU144	Perborate Add Mix Receiver Use Bin (South). Control Device - Dynamic Air 343-1200 Baghouse (CD128-018)
EU145	Perborate Storage Silo. Control Device - Flex Kleen 184-WRTC-48 Baghouse (CD129-018)
EU146	Perborate Receiver /Feeder Use Bin. PBI (North) Control Device - Dynamic Air 343-900 Baghouse (CD137-018)
EU149	Start-up Reblend Bin - Receiver, Feeder and Hopper (PBI - N) Control Device - Flex Kleen 20-CTR-16 Baghouse (CD133-018)

<p>Permit Condition EU144-001, EU145-001, EU146-001 and EU149-001</p> <p>10 CSR 10-6.060 Construction Permits Required</p> <p>St. Louis City APCP Construction Permit for Receiving & Transferring Raw Material, Issued</p> <p>May 26, 1993</p> <p>10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes</p>

Emission Limitation:

- 1) The unloading and transferring throughput shall not exceed the limits in any consecutive 12-month period as specified bellow:
 - a) 110,000 tons of DiSillicate;
 - b) 63,500 tons of Perborate; and
 - c) 55,000 of Citrate.
- 2) The concentration of PM shall not exceed 0.01 grain per standard cubic foot of exhaust gases through any dust collectors.
- 3) The permittee shall not emit particulate matter in excess of 5.14 lb/hr from EU145.
[10 CSR 10-6.400]

Monitoring:

- 1) Visible emissions will be used as an indicator of the proper operation of the control devices. During proper operation no visible emissions are expected from dust collector exhausts. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions will be implemented. Observations will be made using a USEPA Method 22 trained observer and U.S. EPA Method 22 like procedures.
 - a) Frequency: - Visible emissions from each baghouse exhaust shall be monitored on a daily basis when the unit(s) is in operation.
 - b) Duration: - The duration of the observation shall be for a two minute time period.
 - c) Threshold: - The condition of no visible emissions is considered normal for this emission unit. When visible emissions are noted from the emission unit, it shall be documented and corrective actions undertaken.
 - d) The observation of visible emissions from the emission unit(s) will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the emission limitations. When the level of excursions exceed three percent of the of the total number of observations in a six month period and corrective actions fail to return the emission unit to a no visible emission condition, then the permittee shall conduct source testing within 90 days of the last excursion to demonstrate compliance with PM concentration and 10 CSR 10-6.400 limits. If the test demonstrates noncompliance with the above emission limitation the permittee shall propose a schedule to implement further corrective actions to bring the source(s) into compliance and demonstrate that compliance.
- 2) The control equipment shall be maintained and operated according to the manufacturer's specifications.

Recordkeeping:

- 1) The permittee shall record the unloading and transferring throughput on a monthly basis.
- 2) The permittee shall maintain records of all observations. At a minimum the following observation conditions shall be noted:
 - a) The date and time of the observation and the weather condition;
 - b) Observations of visible emissions from the emission unit(s). Note: The absence of visible emission may be reported in a statement such as "No visible emissions were observed from this emission unit(s);" and
 - c) The corrective actions taken during excursions. Maintenance and inspection records shall also be maintained for the control device on this emission unit.
- 3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU151, EU152, EU154, EU155, EU157 and EU158 – Enzyme, Making & Vacuum System.	
Emission Unit	Description
EU151	Powder Silo Storage System/Old Packing Filter Control Device - Baghouse (Flex Kleen 100 WRTR 256 II)
EU152	North Making Filter - North making filter, north and south sifters,tub fill, and super sack fill Control Device - Flex Kleen 100-WRTR-256 Baghouse(CD104-018)
EU154	Fifth Filter/Enzyme Filter - Enzyme filter, reblend totes, enzyme totes, reblend receivers, enzyme receivers, bin feeders, admix hopper, conveyors. Control Device - Flex Kleen 100WSWC-169-III Baghouse (CD119-018)
EU155	Packing Central Vacuum System (CVC) Control Device - Flex Kleen 100 CTR-18M14 Baghouse (CD107-018)
EU157	Carton Riddling Filter. Control Device - Flex Kleen 100 WSWC 121-III Baghouse (CD139-018)
EU158	Process Central Vacuum System. Control Device - Flex Kleen 100 CTR-18M14 Baghouse (CD107-018)

Permit Condition EU151-001, EU152-001, EU154-001, EU155-001, EU157-001 and EU158-001

10 CSR 10-6.060 Construction Permits Required

St. Louis City APCP Construction Permit for Enzyme, Making & Vacuum System, Issued May 26, 1993

Operational Limitation:

The efficiency of any of the dust collectors (baghouses) shall be at least ninety-nine percent (99%). The appropriate dust collector must be in operation prior to start of any operations associated with the control equipment.

Monitoring:

- 1) Visible emissions will be used as an indicator of the proper operation of the control devices. During proper operation no visible emissions are expected from dust collector exhausts. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions will be implemented. Observations will be made using a U.S. EPA Method 22 trained observer and U.S. EPA Method 22 like procedures.
 - a) Frequency: - Visible emissions from each baghouse exhaust shall be monitored on a daily basis when the unit(s) is in operation.
 - b) Duration: - The duration of the observation shall be for a 2 minute time period.

- c) Threshold: - The condition of no visible emissions is considered normal for the emission unit(s). When visible emissions are noted from the emission unit(s), it shall be documented and corrective actions undertaken.
- d) The observation of visible emissions from the emission unit(s) will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the operational limitations. When the level of excursions exceed three percent of the of the total number of observations in a six month period and corrective actions fail to return the emission unit(s) to a no visible emission condition, then the permittee shall conduct source testing within 90 days of the last excursion to demonstrate compliance with operational limitations. If the test demonstrates noncompliance with the above operational limitations the permittee shall propose a schedule to implement further corrective actions to bring the source(s) into compliance and demonstrate that compliance.
- 2) The control equipment shall be maintained and operated according to the manufacturer's specifications.

Recordkeeping:

- 1) The permittee shall maintain records of all observations. At a minimum the following observation conditions shall be noted:
- The date and time of the observation and the weather condition;
 - Observations of visible emissions from the emission unit(s). Note: The absence of visible emission may be reported in a statement such as "No visible emissions were observed from the emission unit(s);" and
 - The corrective actions taken during excursions. Maintenance and inspection records shall also be maintained for the control devices.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU174 – DPG Perfume Storage Tank.	
Emission Unit	Description
EU174	DPG Perfume Storage Tank, 6,130 Gallon – Storage for various perfume products including dipropylene glycol fragrance and pine perfume.

<p>Permit Condition EU174-001</p> <p>10 CSR 10-6.060 Construction Permits Required</p> <p>St. Louis City ACP Construction Permit No. 04-10-019</p>

Emission Limitation:

The permittee shall limit throughput to 1,000,000 gallons of product through the tank in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall keep monthly records of the throughput and calculate a consecutive 12-month total every month.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report any spills or leaks of 25 gallons or greater to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 within 24 hours.
- 2) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation.

EU178 – Line 14 Seal Clean EU180 – Line 10 Seal Clean EU181 – Line 10 Platen Vac EU182 – Line 14 Platen Vac	
Emission Unit	Description
EU174	Line 14 Seal Clean – Fameccanica Convertor with baghouse.
EU180	Line 10 Seal Clean with baghouse.
EU181	Line 10 Platen Vac with baghouse.
EU182	Line 14 Platen Vac - Dish detergent packet forming with baghouse.

Permit Condition EU178-001 through EU182-001
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes
Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 9.86 lb/hr from EU178 through EU182.
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

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

Monitoring/Recordkeeping/Reporting:

Not required (See Statement of Basis).

Monitoring:

- 1) Visible emissions will be used as an indicator of the proper operation of the control devices. During proper operation no visible emissions are expected from dust collector exhausts. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions will be implemented. Observations will be made using a U.S. EPA Method 22 trained observer and U.S. EPA Method 22 like procedures.
 - a) Frequency: - Visible emissions from each baghouse exhaust shall be monitored on a daily basis when the unit(s) is in operation.
 - b) Duration: - The duration of the observation shall be for a two minute time period.

- c) Threshold: - The condition of no visible emissions is considered normal for the emission unit(s). When visible emissions are noted from the emission unit(s), it shall be documented and corrective actions undertaken.
 - d) The observation of visible emissions from the emission unit(s) will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the operational limitations. When the level of excursions exceed three percent of the of the total number of observations in a six month period and corrective actions fail to return the emission unit(s) to a no visible emission condition, then the permittee shall conduct source testing within 90 days of the last excursion to demonstrate compliance with operational limitations. If the test demonstrates noncompliance with the above operational limitations the permittee shall propose a schedule to implement further corrective actions to bring the source(s) into compliance and demonstrate that compliance.
- 2) The control equipment shall be maintained and operated according to the manufacturer's specifications.

Recordkeeping:

- 1) The permittee shall maintain records of all observations. At a minimum the following observation conditions shall be noted:
 - a) The date and time of the observation and the weather condition;
 - b) Observations of visible emissions from the emission unit(s). Note: The absence of visible emission may be reported in a statement such as "No visible emissions were observed from the emission unit(s);" and
 - c) The corrective actions taken during excursions. Maintenance and inspection records shall also be maintained for the control devices.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

Permit Condition EU178-002 and EU182-002

City of St. Louis Source Registration Permit No. SR09-012

This permit condition is not federally or state enforceable.

Operational Limitation:

The convertor lines shall not operate without the associated baghouses in operation.

EU183 through EU191 - Storage Silos, Hold Bins, Dump Hoppers and Bulk Loading/Unloading System

Each of the bins and silos storing solid materials will be equipped with a bin vent filter to control particulate matter emissions from the storage and transfer of dry material.

Emission Unit	Description
EU183	MDGA Silo – Storage Silo #1
EU184	Citrate Silo - Storage Silo #2
EU185	MDGA FRL – Hold Bin #1
EU186	Citrate FRL – Hold Bin #2
EU187	North Sulfate FRL – Hold Bin #3
EU188	South Sulfate FRL – Hold Bin #4
EU189	Dump Hopper #1 & #2/Hold Bin/Use Bin – Accusol/Disil
EU190	Bulk Loading System
EU191	Bulk Unloading System

Permit Condition EU183-001 through EU191-001

10 CSR 10-6.060 Construction Permits Required

St. Louis City ACP Construction Permit No. 09-07-017

Emission Limitation:

P&G shall emit less than 15.0 tons of PM₁₀ and less than 10.0 tons of PM_{2.5} in any consecutive 12-month period from this project equipment.

Operational Limitation/Equipment Specifications:

Control Device Requirement-Dust Collectors

- 1) P&G shall control emissions from the following equipment using dust collectors as specified in the Construction Permit 02-10-021 application.
 - a) Storage Silo #1;
 - b) Storage Silo #2;
 - c) Hold Bin #1;
 - d) Hold Bin #2;
 - e) Hold Bin #3;
 - f) Hold Bin #4;
 - g) Dump Hopper #1 & #2/Hold Bin/Use Bin;
 - h) Bulk Loading System; and
 - i) Bulk Unloading System
- 2) The dust collectors shall be operated and maintained in accordance with the manufacturer's specifications. The dust collectors 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 DNR employees may easily observe them. Replacement filters for the dust collectors shall be kept on hand at all times. The dust collectors shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
- 3) The permittee shall ensure that the dust collectors are in operation at all times when the detergent manufacturing line is in operation.

Monitoring:

P&G shall monitor and record the operating pressure drop across the dust collectors at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's warranty.

Recordkeeping:

- 1) P&G shall maintain written or electronic records to verify compliance with the emission limitation. The records shall include a calculation of PM₁₀ and PM_{2.5} emissions for all project equipment for each consecutive 12-month period.
- 2) P&G shall maintain an operating and maintenance log for the dust collectors which shall include the following:
 - a) Incidents of malfunctions, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten days after the permittee determined that the unit(s) exceeded the emission limitation or deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the operating pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU401 – Tank #33901, Underground Ethanol Storage Tank	
Emission Unit	Description
EU401	Tank #33901, Underground Ethanol Storage Tank – Tank has a P/V valve, a flame arrester, a nitrogen blanket and a level control valve to keep from overflowing with ethanol. 46,000 Gallon Capacity, Constructed in 1980. The maximum true vapor pressure is greater than or equal to 0.5 psia, but less than 0.751 psia at the underground temperature.

Permit Condition EU401-001
10 CSR 10-5.500 Control of Emissions from Volatile Organic Liquid Storage

General Provisions – Volatile organic liquid (VOL) storage tanks of 40,000 gallons or greater with a maximum true vapor pressure greater than or equal to one-half (0.5) psia but less than three quarters (0.75) psia shall be subject to the record-keeping requirements of Subsection (4)(G) and the monitoring requirements of Subsection (4)(H).

Monitoring Requirements:

- 1) The owner or operator of each storage vessel with a design capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall notify the department within thirty (30) days when the maximum true vapor pressure of the liquid exceeds 0.75 psia.

- 2) Available data on the storage temperature may be used to determine the maximum true vapor pressure.
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

Reporting and Recordkeeping:

- 1) The permittee shall maintain a record of the VOL storage, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

EU418 – Solution Premix Tank	
Emission Unit	Description
EU418	Solution Premix Tank – With Rotoclone for PM control. The tank mixes phosphate and zinc carbonate into a slurry form.

<p>Permit Condition EU418-001</p> <p>10 CSR 10-6.060 Construction Permits Required</p> <p>St. Louis City APCP Construction Permit No. 05-12-012</p>
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Operational Limitation:

The permittee shall only allow use of this tank for production processes utilizing the addition of solids while the rotoclone is in operation.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain records indicating any condition where the solution premix tank was unable to operate due to the rotoclone malfunctions.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

Any exceedances of any terms and conditions of Construction Permit 05-12-012 shall be reported to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 in writing within ten days.

EU445, EU447 and EU449 – Storage Tanks	
Emission Unit	Description
EU445	C8-10, E6 Storage Tank - Tank #33105, 12,588 gallon ethoxylated alcohol storage tank
EU447	CBS Base Storage Tank - Tank #10040, 63,000 gallon capacity, 1.8 Base/Spic and Span Storage
EU449	AMB-15 Storage Tank - Tank #33109; 12,588 gallon capacity

Permit Condition EU445-001, EU447-001 and EU449-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City ACP Construction Permit for Storage Tanks, Issued January 21, 1994

Operational Limitation:

The maximum throughput of the tanks shall be limited to the quantities listed below:

Tank Identification	Tank Capacity Gallons	Content	Maximum Throughput Limit Gallons per Year
Tank #33105 (EU445)	12,588	Ethoxylated Alcohol	95,000
Tank #10010 (EU447)	63,000	1.8 Base/Spic and Span	2,750,00
Tank #33109 (EU449)	12,588	AMB-15	325,000

Monitoring/Recordkeeping:

- 1) The permittee shall keep monthly records of the throughputs and calculate a consecutive 12-month total every month.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation.

EU450 – AE21 Storage Tank	
Emission Unit	Description
EU450	AE21 Storage Tank - Tank #33122, 15,226 gallon alcohol ethoxylate storage tank

Permit Condition EU450-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City ACP Construction Permit No. 94-04-022

Operational Limitation:

The permittee shall only store alcohol ethoxylate in this this tank and the tank storage capacity shall be 15,226 gallons as per the construction permit application.

Monitoring/Recordkeeping:

- 1) Records of throughput in gallons (loading and unloading shall be kept for this tank.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

Reports of any deviations from operational limitation, monitoring and recordkeeping requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU451 – Propylene Glycol Storage Tank	
Emission Unit	Description
EU451	Propylene Glycol Storage Tank - Tank #33123. Capacity- 2,380 Gallons

Permit Condition EU451-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No. 94-08-063

Operational Limitation:

- 1) Storage tank #33123 shall be used for the storage of Downfrost Heat Transfer Fluid containing Propylene Glycol as its principal product.
- 2) The storage of any other organic liquids is prohibited.

Monitoring/Recordkeeping:

- 1) Records of contents and throughput shall be kept.
- 2) Records of maintenance and service to the tank shall be kept.
- 3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

Reports of any deviations from operational limitation, monitoring and recordkeeping requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU453 – BPP Storage Tank EU454 - Coconut Fatty Acid Storage Tank	
Emission Unit	Description
EU453	BPP Storage Tank – n-Butoxy propyl Propanol (BPP) Storage Tank– Tank #33121 Capacity- 6,000 Gallons
EU454	Coconut Fatty Acid Storage Tank - Tank #33125 Capacity- 6,340 Gallons

Permit Condition EU453-001 and EU454-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No. 94-10-116

Operational Limitation:

- 1) The throughput of the system shall be limited for these tanks to a total of 250,000 gallons per month (3,000,000 gallons per year).
- 2) All equipment shall be operated and maintained according to the manufacturer’s instructions.

Monitoring/Recordkeeping:

- 1) Accurate, easily understood, up to date records shall be kept of the throughput of each tank. These records shall be kept as a month moving average indicating usage during the previous 12 months.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the operational limitation.

EU455 – Neodol 91-8 Storage Tank	
Emission Unit	Description
EU455	Neodol 91-8 Storage Tank – Tank #33126 Alcohol Ethoxylate Storage Tank, Tank #33126 Capacity- 15,000 Gallons

Permit Condition EU455-001
City of St. Louis Source Registration Permit No. SR02-040

This permit condition is not federally or state enforceable.

Recordkeeping:

The permittee shall keep records of tank contents.

EU457 – Toto Tank	
Emission Unit	Description
EU456	Toto Tank (Perfume storage tank) – Tank #34950. Capacity- 350 Gallons

Permit Condition EU457-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No. 95-01-009

Operational Limitation:

- 1) Tank #34950 shall be limited to a throughput of 1,000 gallons per month.
- 2) All equipment shall be operated and maintained according to the manufacturer’s instructions.

Monitoring/Recordkeeping:

- 1) Accurate, easily understood, up to date records shall be kept of the throughput of each tank. These records shall be kept as a month moving average indicating usage during the previous 12 months.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the operational limitation.
- 2) Reports of any deviations from monitoring and recordkeeping requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU460 – Surfactant Storage Tank EU461 – HPBCD Cyclodextrin Storage Tank EU464 – Effluent Tank	
Emission Unit	Description
EU460	Surfactant Storage Tank – C24-5 (Alkyl Sulfate) Storage Tank, Tank #72800 Capacity- 15,000 Gallons
EU461	HPBCD Cyclodextrin Storage Tank - Tank #70600 Capacity- 15,000 Gallons
EU464	Effluent Tank – Formulated Cleaner Storage Tank, Tank#35550 Capacity- 15,000 Gallons

Permit Condition EU460-001, EU461-001, and EU464-001**10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No. 95-06-076****Operational Limitation:**

- 1) The throughput of the system shall be limited for these tanks to a total of 250,000 gallons per month (3,000,000 gallons per year).
- 2) All equipment shall be operated and maintained according to the manufacturer's instructions.

Monitoring/Recordkeeping:

- 1) Accurate, easily understood, up to date records shall be kept of the throughput of each tank. These records shall be kept as a month moving average indicating usage during the previous 12 months.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the operational limitation.

EU462 – Sodium Benzoate Storage Tank

Emission Unit	Description
EU462	Sodium Benzoate Storage Tank - Tank #71100 Capacity- 15,000 Gallons

Permit Condition EU462-001**City of St. Louis Source Registration Permit No. SR02-041**

This permit condition is not federally or state enforceable.

Recordkeeping:

The permittee shall keep records of tank contents.

EU465 – Line 3 Finished Product Tank**EU466 – Line 4 Finished Product Tank**

Emission Unit	Description
EU465	Line 3 Finished Product Tank - Orchard Splash & BSFS Finished Product Storage Tank, Tank #70900 ; Capacity- 7,100 Gallons
EU466	Line 3 Finished Product Tank - Lemon Finished Product Storage Tank, Tank #71000 Capacity- 7,100 Gallons

Permit Condition EU465-001 and EU466-001

**10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No. 01-07-022**

Emission Limitation:

The permittee shall not emit more than 4.79 tons VOCs from EU465 and EU466 in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall calculate and record monthly emissions for each tank. Emissions total shall be kept on a consecutive 12- month basis.
- 2) Maintenance records for the equipment shall be kept. The facility shall also keep a record of any spills of leaks of more than 20 gallons (reportable quantity), including all reporting and corrective actions taken.
- 3) Accurate, easily understood, up to date records shall be kept of the throughput of each tank. These records shall be kept as a month moving average indicating usage during the previous 12 months.
- 4) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation.
- 2) Reports of any deviations from monitoring and recordkeeping requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU467 – Liquid Gel Effluent Tank EU468 – Sodium Hydrochlorite Solution Storage Tanks	
Emission Unit	Description
EU467	Liquid Gel Effluent Tank, Tank #70900 ; Capacity- 7,400 Gallons
EU468	Sodium Hypochlorite Bleach Solution Storage Tanks - Tank #'s 71700; 71900; 72000 and 72100 Capacity- 7,400 Gallons, 1,400 Gallons, 7,400 Gallons and 1,400 Gallons

Permit Condition EU467-001 and EU468-001**10 CSR 10-6.060 Construction Permits Required****St. Louis City ACP Construction Permit No. 95-07-088 and 95-07-088PM****Emission Limitation:**

The actual consecutive 12-month totaled VOC emissions from the EU467 and EU468 shall not exceed the potential emissions listed in the table below:

Tank Identification	Tank Capacity Gallons	VOC Limit Pounds per Year
Tank #70900 (EU467)	7,400	less than 100
Tank #71700 (EU468)	7,400	less than 500
Tank #71900 (EU468)	1,400	less than 400
Tank #72000 (EU468)	7,400	less than 500
Tank #72100 (EU468)	1,400	less than 300

Operational Limitation:

All equipment shall be operated and maintained according to the manufacturer's instructions.

Monitoring/Recordkeeping:

- 1) The Permittee shall calculate and record monthly emissions for each tank. Emissions total shall be kept on a consecutive 12- month basis.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation.
- 2) Reports of any deviations from monitoring and recordkeeping requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU485 – Sodium Carbonate/Soda Ash Slurry Storage Tank	
Emission Unit	Description
EU485	Sodium Carbonate/Soda Ash Slurry Storage Tank – Tank #33124 Capacity- 12,500 Gallons

Permit Condition EU485-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City ACP Construction Permit No. 94-08-64

Operational Limitation:

Storage Tank #33124 (EU485) shall be used for the storage of Potassium Carbonate solution. The storage of organic liquids in this tank is prohibited.

Monitoring/Recordkeeping:

- 1) Records of contents and throughput shall be kept.
- 2) Records of maintenance and service to the tank shall be kept.
- 3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

Reports of any deviations from operational limitation, monitoring and recordkeeping requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU494 – Line 6 Storage Tank EU495 – Line 7 Storage Tank	
Emission Unit	Description
EU494	Line 6 Storage Tank - Tank #107500 Capacity- 530 Gallons
EU495	Line 7 Storage Tank - Tank #10800 Capacity- 520 Gallons

Permit Condition EU494-001 and EU495-001
City of St. Louis Source Registration Permit No. SR08-012

This permit condition is not federally or state enforceable.

Operational Limitation:

The tanks shall be used for the storage of febreze.

Recordkeeping:

- 1) The permittee shall keep Maintenance records for storage tanks and filling lines.
- 2) The permittee shall keep records of material stored in the tanks and transferred using the filling equipment, including VOC content of material.

EU501 – Phosphate Transfer Filter EU502 - Carbonate Silo Filter EU503 – Carbonate 3rd Filter for Use Bin	
Emission Unit	Description
EU501	Phosphate Transfer Filter - Unload phosphate to silo EU502 Control Device - Flex Kleen 84JF Baghouse (CD123-018))
EU502	Carbonate Silo Filter Control Device - Flex Kleen 84JF Baghouse (CD123-018))
EU503	Carbonate 3 rd Filter for Use Bin Control Device - Dynamic Air 343-1200 Baghouse(CD131-018)

Permit Condition EU501-001 through EU503-001

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of:
 - a) 16.93 lb/hr from EU501; and
 - b) 8.56 lb/hr from EU502, and
 - c) 8.56 lb/hr from EU503
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

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

Monitoring:

- 1) Visible emissions will be used as an indicator of the proper operation of the control devices. During proper operation no visible emissions are expected from dust collector exhausts. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions will be implemented. Observations will be made using a USEPA Method 22 trained observer and U.S. EPA Method 22 like procedures.
 - a) Frequency: - Visible emissions from each baghouse exhaust shall be monitored on a daily basis when the unit(s) is in operation.
 - b) Duration: - The duration of the observation shall be for a 2 minute time period.
 - c) Threshold: - The condition of no visible emissions is considered normal for the emission unit(s). When visible emissions are noted from the emission unit(s), it shall be documented and corrective actions undertaken.

- d) The observation of visible emissions from the emission unit(s) will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the operational limitations. When the level of excursions exceed three percent of the of the total number of observations in a six month period and corrective actions fail to return the emission unit(s) to a no visible emission condition, then the permittee shall conduct source testing within 90 days of the last excursion to demonstrate compliance with operational limitations. If the test demonstrates noncompliance with the above operational limitations the permittee shall propose a schedule to implement further corrective actions to bring the source(s) into compliance and demonstrate that compliance.
- 2) The control equipment shall be maintained and operated according to the manufacturer's specifications.

Recordkeeping:

- 1) The permittee shall maintain records of all observations. At a minimum the following observation conditions shall be noted:
- The date and time of the observation and the weather condition;
 - Observations of visible emissions from the emission unit(s). Note: The absence of visible emission may be reported in a statement such as "No visible emissions were observed from the emission unit(s);" and
 - The corrective actions taken during excursions. Maintenance and inspection records shall also be maintained for the control devices.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU509 – Perfume Tank EU510 – Uniquat Tank	
Emission Unit	Description
EU509	Perfume Tank, Tank # 34950; Perfume 280-gal70900 ; Capacity- 280 Gallons
EU510	Uniquat Tank Capacity- 300 Gallons

Permit Condition EU509-001 and EU510-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Construction Permit No.00-06-031

Emission Limitation:

The tanks shall contain and be limited to the following in any consecutive 12-month period:

Tank Identification	Tank Capacity Gallons	Content	Maximum Throughput Limit Gallons per Year
EU 509 (Tank #34950)	280	Osiris Zephyr	34,500,000
EU510	300	Uniquat	71,500,000

Operational Limitation:

All equipment shall be operated and maintained according to the manufacturer’s instructions.

Monitoring/Recordkeeping:

- 1) The Permittee shall calculate and record monthly emissions for each tank. Emissions total shall be kept on a consecutive 12- month basis.
- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report any spills or leaks of 20 gallons or greater to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 within a reasonable time, not to exceed 5:00 p.m. the following business day.
- 2) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation.

EU511 - PNB Tank EU512 – Pre-Mix Batch Tank EU513 – Swiffer Finished Product Storage Tank	
Emission Unit	Description
EU511	PNB Tank – Existing horizontal underground propylene glycol n-butyl ether storage tank, Tank #33902 Capacity- 46,000 Gallons
EU512	Pre-Mix Batch Tank – Process involves mixing a combination of chemicals from the re-used underground storage tanks into the 290 gallon pre-mix batch tank. Capacity- 290 Gallons
EU513	Swiffer Finished Product Storage Tank Capacity- 675 Gallons

Permit Condition EU511-001, EU512-001 and EU513-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City ACP Construction Permit No.04-02-004

Reporting:

The permittee shall report any spills or leaks of 25 gallons or greater to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 within 24 hours.

Permit Condition EU512-002
10 CSR 10-5-.540 Control of Emissions from Batch Process Operation

Reporting:

Every owner or operator of a de minimis single unit operation or batch process train exempt under paragraph (1)(C)1. or (1)(C)2. of 10 CSR 10-5.540 shall keep records of the uncontrolled total annual mass emissions for any de minimis single unit operation or batch process train, as applicable, and documentation verifying these values or measurements. The documentation shall include the engineering calculations, any measurements made in accordance with Section (5) of 10 CSR 10-5.540, and the potential or permitted number of batch cycles per year, or, in the alternative, total production as represented in the source’s operating permit. [10 CSR 10-5.540(4)(A)]

EU603 and EU604 - Boilers		
Emission Unit	Description	Manufacturer/ Model #
EU603	Boiler #3 – 61 million British thermal units (MMBtu/hr) (Installed 1929) Primary Fuel - Natural Gas Secondary Fuel – Fuel Oil No. 2	Babcox-Wilcox
EU604	Boiler #4 – 61 MMBtu/hr (Installed 1929) Primary Fuel - Natural Gas Secondary Fuel – Fuel Oil No. 2	

Permit Condition EU603-001 and EU604-001
10 CSR 10-6.060 Construction Permits Required
St. Louis City APCP Permit – Steam Boilers (Fuel Change – No. 6 Oil to Natural Gas)
Dated March 4, 1994

Emission Limitation:

- 1) PM Emissions: less than or equal to 1.25 lb/hr;
- 2) SO_x Emissions: less than or equal to 0.5 lb/MMBtu (equivalent to 30.5 lb/hr); and
- 3) NO_x Emissions: less than or equal to 0.11 lb/hr (equivalent to 7.0 lb/hr)

Operational Limitation:

- 1) The boilers shall be operated and maintained in accordance with the manufacturer’s instructions and construction permit application, dated February 11, 1993.
- 2) Both boilers shall be fired with the natural gas as a primary fuel and Fuel Oil No. 2 as a secondary fuel.
- 3) Maximum usage of Fuel Oil No. 2 shall be no more than 1,890,000 gallons annually for both boilers.
- 4) Maximum usage of natural gas shall be no more than 762.3 million cubic feet (MMcf) annually for both boilers.
- 5) The exhaust concentration for PM emissions at the boiler stack shall not exceed a limit of 0.03 grains per standard cubic foot.

Monitoring/Recordkeeping:

- 1) The permittee shall keep monthly record of the following:
 - a) Record of actual operational for both boilers; and
 - b) Record of natural gas consumption and Fuel Oil No. 2 usage for both boilers;

- 2) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

Permit Condition EU603-002 and EU604-002**10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for
Area Sources: Industrial, Commercial, and Institutional Boilers**

You must comply with the applicable emission limitations and operating limitations no later than March 21, 2014. [§63.11196]

Emission Limitation/Standards:

- 1) The Permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to Subpart JJJJJJ of 40 CFR Part 63 that applies to your boiler. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in Table 2 to Subpart JJJJJJ of 40 CFR Part 63 satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. [§63.11201(b)]
 - a) The permittee must conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.
 - b) The permittee must conduct a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements of the rule satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items i) to iv) appropriate for the on-site technical hours listed in §63.11237:
 - i) A visual inspection of the boiler system,
 - ii) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,
 - iii) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,
 - iv) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
 - v) A list of major energy conservation measures that are within the facility's control,

- vi) A list of the energy savings potential of the energy conservation measures identified, and
 - vii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- 2) These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart. [§63.11201(d)]

General Compliance Requirements:

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

Initial Compliance Requirement:

- 1) The permittee must demonstrate initial compliance no later than March 21, 2014, that is specified in §63.11196 and according to the applicable provisions in §63.7(a)(2), except as provided in §63.11210(j). [§63.11210(c)]
- 2) The permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to Subpart JJJJJ of 40 CFR Part 63 and is an accurate depiction of your facility. [§63.11214(c)]

Continuous Compliance Requirement:

- 1) The permittee must conduct a performance tune-up according to §63.11223(b) and keep records as required in §63.11225(c) to demonstrate continuous compliance. The permittee must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223(a)]
- 2) The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in §63.11223(b)(1) through (7). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler. [§63.11223(b)]
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. [§63.11223(b)(1)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. [§63.11223(b)(3)]

- d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [§63.11223(b)(4)]
- e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [§63.11223(b)(5)]
- f) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) stated below. [§63.11223(b)(6)]
 - i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
 - ii) A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]
 - iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [§63.11223(b)(6)(iii)]
- 3) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [§63.11223(b)(7)]

Recordkeeping:

- 1) You must maintain the records specified in below: [§63.11225(c)]
 - a) As required in § 63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted. [§63.11225(c)(1)]
 - b) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and 63.11223 as specified in §63.11225(c)(2)(i) through (iii) below. [§63.11225(c)(2)]
 - i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [§63.11225(c)(2)(i)]
 - ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4(a). [§63.11225(c)(2)(ii)]
 - iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report. [§63.11225(c)(2)(iii)]
 - c) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to

restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [§63.11225(c)(5)]

- 2) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for five years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least two years after the date of each recorded action. You may keep the records off site for the remaining three years. [§63.11225(d)]

Reporting:

- 1) You must submit the notifications specified in paragraphs (a)(1) through (5) of §63.11225 to the administrator. [§63.11225(a)]
- a) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of §63.11225. [§63.11225(a)(1)]
 - b) An Initial Notification must be submitted no later than January 20, 2014, or within 120 days after the source becomes subject to the standard. [§63.11225(a)(2)]
 - c) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in § 63.11196. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of §63.11225(a). The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (iii) and (v) of §63.11225, as applicable, and signed by a responsible official. [§63.11225(a)(4)]
 - i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). [§63.11225(a)(4)(i)]
 - ii) “This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler.” [§63.11225(a)(ii)]
 - iii) “This facility has had an energy assessment performed according to §63.11214(c).” [§63.11225(a)(4)(iii)]
 - iv) For units that do not qualify for a statutory exemption as provided in Section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” [§63.11225(a)(iv)]
 - v) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13. [§63.11225(a)(4)(vi)]
- 2) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of §63.11225. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of §63.11225. For boilers that are subject only to a requirement to conduct a biennial or five-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or five-year compliance report as specified in paragraphs (b)(1) and (2) of §63.11225. [§63.11225(b)]
- a) Company name and address. [§63.11225(b)(1)]
 - b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this

subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official: [§63.11225(b)(2)]

- i) “This facility complies with the requirements in §63.11223 to conduct a biennial or five-year tune-up, as applicable, of each boiler.” [§63.11225(b)(2)(i)]
 - ii) For units that do not qualify for a statutory exemption as provided in Section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” [§63.11225(b)(2)(ii)]
 - c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [§63.11225(b)(3)]
 - d) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of § 241.3, and the total fuel usage amount with units of measure. [§63.11225(b)(4)]
- 3) If you intend to commence or recommence combustion of solid waste, you must provide 30 days prior notice of the date upon which you will commence or recommence combustion of solid waste. The notification must identify: [§63.11225(f)]
- a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice. [§63.11225(f)(1)]
 - b) The currently applicable subcategory under this subpart. [§63.11225(f)(2)]
 - c) The date on which you became subject to the currently applicable emission limits. [§63.11225(f)(3)]
 - d) The date upon which you will commence combusting solid waste. [§63.11225(f)(4)]
- 4) If you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within Subpart JJJJJ, in the boiler becoming subject to Subpart JJJJJ, or in the boiler switching out of Subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to Subpart JJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify: [§63.11225(g)]
- a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice. [§63.11225(g)(1)]
 - b) The date upon which the fuel switch, physical change, or permit limit occurred. [§63.11225(g)(2)]

EU605 – Parts Washers	
Emission Unit	Description
EU605	Five (5) Parts Washers – Serviced by Safety-Kleen and all use SK 150 Premium Solvent and monoethanolamine-containing solvent.

<p>Permit Condition EU605-001</p> <p>10 CSR 10-5.300</p> <p>Control of Emissions from Solvent Cleaning</p>

Emission Limitation:

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

Operational Limitation/Equipment Specification:

- 1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 2) When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
 - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
 - b) The solvent is agitated; or
 - c) The solvent is heated.
- 3) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining.
- 4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- 5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices:
 - a) A freeboard ratio of at least 0.75;
 - b) Water cover (solvent must be insoluble in and heavier than water); or
 - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems must receive approval from the director and EPA prior to their use.

- 8) Each cold cleaner shall be operated as follows:
 - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
 - b) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
 - c) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
 - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down until the leaks are repaired.
 - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the director and EPA:
 - i) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or
 - ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the director and EPA.
 - f) Waste solvent shall be stored in covered containers only.
- 9) Operators must be trained as follows:
 - a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process shall operate this equipment;
 - b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
 - c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment G):
 - a) Name and address of the solvent supplier.
 - b) Date of purchase.
 - c) Type of solvent purchased.
 - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment E). The record also shall include maintenance and repair logs that occurred on the degreaser (Attachments F). These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.
- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment H).
- 4) All records shall be retained for five years and be available to the director upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

IV. Core Permit Requirements

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

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

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

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

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

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) 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.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

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

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

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

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

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan

area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.

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

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).

- e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

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

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

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

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

1) Recordkeeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting

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

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

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

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

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

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

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

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

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

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

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

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

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

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

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

The application utilized in the preparation of this permit was signed by Frank Blumling, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible

person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

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

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

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

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

Readings ranged from _____ to _____ % opacity.

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

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Renewal Application, received May 18, 2011;
- 2) 2012 Emissions Inventory Questionnaire, received March 28, 2013;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) City of St Louis Air Pollution Control Program Construction Permits and Source Registration Permits Issued to P&G St. Louis Plant:

Permit Number	Description
May 26, 1993	Receiving and Transferring Raw Materials
January 1, 1994	Five Storage Tanks
March 4, 1994	Steam Boilers
94-04-022	Material Storage Tank for Alcohol Ethorylate
94-08-063	Storage Tanks (#33123)
94-08-064	Storage Tanks (#33124)
94-10-116	Storage Tanks Installation (#452 – 455), Modified by SR02.040
95-10-009	Two (2) Storage Tanks
95-04-046	Lime Storage Silo & Pneumatic Lime Transfer System
95-06-046	Chemical Storage Tanks #460, 462, 463, 464. Modified by SR02.041
95-07-088	Seven (7) Chemical Storage Tanks
95-07-088PM	Permit Modification to Permit No. 95-07-088
00-06-031	Two (2) Chemical Tanks
01-05-009	Addition of Four (4) Perfume Process Tanks
01-07-022	Two (2) Storage Tanks
02-10-021	Cascade Packing
SR02.040	NEODOL 91-5 Storage Fixed Roof Tank (Superceded 94-10-116 with respect to Tank #455)
SR02.041	Sodium Benzoate Tank #462 (Superceded 95-06-076 with respect to Tank #462)
04-02-004	Swiffer Product Process Tanks
04-10-019	6,130 Gallon Perfume Tank
05-12-012	Solution Premix Tank Modification
06-04-007	Phosphate and Carbonate Unloading Fan Replacement
SR07.060	Addition of Packaging Line for Cascade Action Pac Products

Permit Number	Description
SR08.012	Febreze Filling Line
SR09.012	Action Pac Converting Lin
SR09.018	Dry Material Use Bin & Pneumatic Transfer System

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.

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

This rule applies to all existing and new industrial boilers, institutional boilers, and commercial boilers located at area sources. An area source is a facility that has the potential to emit less than 10 tons per year (tpy) of individual hazardous air pollutants (HAP) or 25 tpy of combined HAP.

P&G operates two natural gas-fired boilers with Fuel Oil No. 2 as backup with a heat input capacity greater than 10 MMBtu/hr and an area source of HAP emissions. The boilers are subject to 40 CFR Part 63, Subpart JJJJJ. Therefore P&G will be required to comply with the requirements of 40 CFR Part 63, Subpart JJJJJ.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

1) 10 CSR 10-6.405, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

According to 10 CSR 10-6.405(1)(C) and (E), an installation is exempt from this rule if all of the installation's applicable units are fueled only by landfill gas, propane, natural gas, Fuel Oil No. 2 through Fuel Oil No. 6 (with less than one and two-tenths percent (1.2%) sulfur), or other gases (with hydrogen sulfide levels less than or equal to four (4) parts per million volume as measured using ASTM D4084, or equivalent and mercury concentrations less than forty (40) micrograms per cubic meter as measured using ASTM D5954, or ASTM D6350, or equivalent or any combination of these fuels.

All indirect heating sources operated at this installation exclusively combust natural gas and Fuel Oil No. 2, therefore the installation is not subject to this rule.

2) 10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides.*

This rule applies to installations located in the counties of Franklin, Jefferson, St. Charles and St. Louis and the City of St. Louis with the potential to emit one hundred (100) tons or greater per year of nitrogen oxides that own or operate a boiler that has a name plate capacity greater than 50 MMBtu/hr.

P&G operates two (2) boilers that each has a name plate capacity greater than 50 MMBtu/hr. The two boilers, each emit less than 30 tons of NO_x annually and are exempt from the requirements of

this rule under 10 CSR 10-5.510 (1)(B)9 of the rule, which states the following:

Any unit that would otherwise be required to comply with this rule with actual annual NO_x emissions of thirty tons per year or less. This exemption shall cease to apply to a unit if the unit ever exceeds thirty tons per year of actual NO_x emissions for any calendar year.

3) 10 CSR 10-5.570, *Control of Sulfur Emissions From Stationary Boilers*.

This rule applies to installations located in the counties of Franklin, Jefferson, St. Charles, St. Louis, and St. Louis City that own or operate an industrial, commercial, or institutional boiler or process heater that has a name plate capacity greater than 50 MMBtu/hr. Boilers that exclusively burn natural gas, liquefied petroleum gas (LPG), and/or Fuel Oil No. 2 with less than 0.5 percent sulfur are not subject to this rule. Since the boilers at this installation with the heat input capacity of greater than 50 MMBtu/hr burn natural gas as a primary fuel and Fuel Oil No. 2 with a sulfur content of less than 0.5 percent as back-up fuel, the boilers are not subject to this rule.

4) 10 CSR 10-5.220, *Control of Petroleum Liquid Storage Loading and Transfer*.

The rule is intended to restrict volatile organic compound emissions from the handling of petroleum liquids. Superior is exempt from this rule since none of the tanks on-site store a petroleum liquid as defined in 10 CSR 10-6.020 (2) Definitions.

5) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645.

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

Construction Permit Revisions

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

None

New Source Performance Standards (NSPS) Applicability

1) 40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*.

The provisions of this subpart apply to each fossil-fuel-fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed or modified after August 17, 1971 and not covered under Subpart Da.

None of the boilers are rated at greater than 73 megawatts heat input rate (250 million Btu per hour), therefore this subpart does not apply to this installation.

2) 40 CFR Part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is commenced After September 18, 1978*.

The provisions of this subpart apply to each electric utility fossil-fuel-(either alone or in combination with any other fuel) fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed or modified after September 18, 1978.

None of the boilers are electric utility steam generating units as defined in this subpart nor are rated at greater than 73 megawatts heat input rate (250 million Btu per hour), therefore this subpart does not apply to this installation.

- 3) 40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.*

The provisions of this subpart apply to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu per hour).

None of the boilers are rated at greater than 29 megawatts heat input rate (100 million Btu per hour), therefore this subpart does not apply to this installation.

- 4) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

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

The installation's boilers with a maximum design heat input capacity less than 100 MMBtu/hr, but greater than 10 MMBtu/hr, are constructed prior to the applicability date of this subpart and therefore are not subject to this subpart.

- 5) 40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After June 11, 1973.*
40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After May 18, 1978, and Prior to July 23, 1984.*
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.*

- a) The material being stored in the following storage tanks does not meet the definition of petroleum liquids according to 40 CFR Part 60, Subpart Ka and therefore are not subject to 40 CFR Part 60 Subpart Ka or Kb

Emission Unit #	Description	Capacity (Gallon)
EU401	Underground Ethanol Storage Tank, Installed in 1980	46,000
EU405	Cumene AG (Sodium Cumene Sulfonate) Tank, Installation Date Unavailable	45,500
EU407	Sodium Silicate Storage Tank, Installed in 1998	45,500
EU409	Gel Base Storage Tank, Installed 1980	51,000
EU414	Finished Product (2 X Base) Storage Tank, Installed in 1980	51,000
EU415	Finished Product (Canadian Bath) Storage Tank, Installed in 1980	51,000

Emission Unit #	Description	Capacity (Gallon)
EU439	Comet Bath Spray Storage Tank, Installation Date Unavailable	65,700

- b) EU511 - The PNB (propylene glycol n-butyl ether tank) storage tanks is not subject to the requirements of Subpart Kb. This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) (26.25 mmHg) or with a capacity greater than or equal to 75 m³ (19,812.9 gallons) but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa (112.51 mmHg). The true vapor pressure of the materials being stored in EU511 is 2.88 kPa (0.4173 psia) is less than 3.5 kPa. [§60.110b(b).
- c) The following storage tanks on site are not used to store a petroleum liquid or other volatile organic liquid and/or are less than the applicability thresholds of Subpart Kb.

Emission Unit #	Description	Capacity (Gallon)
EU113	Liquid Silicate Tank, Installation Date Unavailable	45,500
EU114	Surfactant-Acusol Storage Tank, Installed in 2000	45,500
EU115	Timeline Perfume Storage Tank, Installed in 2000	5,000
EU116	Liqiblue 4 Perfume Underground Storage Tank, Installed in 2000	5,000
EU117	Pomerzest Perfume Underground Storage, Installed in 2000	5,000
EU118	SLF 18 Tank, Installed in 2000	45,000
EU126	Pomerzest Perfume Use Tank, Installed in 2001	71
EU127	Perfume Use Tank, Installed in 2001	71
EU167	Liquiblue 4 Perfume Use Tank, Installed in 2001	71
EU168	Cliff/Freefall Perfume Use Tank, Installed in 2001	71
EU174	DPG Perfume Storage Tank, Installed in 2004	6,130
EU209	Pine Perfume Addition Process Tank, Installation Date Unavailable	4,000
EU410	Main Mixing Tank, Installed in 1990	9,700
EU411	Gel Base Storage Tank, Installed in 1990	51,000
EU417	Mr. Clean Lemon Color Mix Tank, Installation Date Unavailable	1,600
EU419	Mr. Clean Mix Tank, Tank #33601, Installation Date Unavailable	250
EU420	MC Spring Fresh Color Mix Tank, Installation Date Unavailable	250
EU426	Ammonia Storage Tank, Installed in 1990	10,500
EU428	KOH Storage Tank, Installed in 2000	12,500
EU429	Polyacrylic Acid Storage Tank, Installed in 1990	400
EU430	Silwet Perfume Storage Tank, Installed in 2000	500
EU431	SSL Pine Perfume/Sparkling Apple Perfume Storage Tank, Installed in 1990	400
EU432	Top Job/Citrus Apple Perfume Storage Tank, Installed in 1990	400
EU433	Lemovert/MCL Perfume Storage Tank, Installed in 1990	400
EU434	C12 AS Sodium Lauryl Sulfate Storage Tank, Installed in 2000	16,300
EU439	Comet Bath Spray Storage Tank, Installed in	65,700
EU444	DEG Storage Tank, Installed in 2000	12,500
EU445	C8-10, E6 Storage Tank, Installed in 1994	12,500
EU447	CBS Base Storage Tank, Installed in 1994	63,000

Emission Unit #	Description	Capacity (Gallon)
EU449	AMB-15 Storage Tank, Installed in 1994	12,500
EU450	AE21 Storage Tank, Installed in 1994	12,226
EU451	Propylene Glycol Storage Tank, Installed in 1994	2,380
EU452	CNFA (Coconut Fatty Acid) Storage Tank, Installed in 1994	8,090
EU453	BPP Storage Tank, Installed in 1994	6,000
EU454	Coconut Fatty Acid Storage Tank, Installed in 1994	6,340
EU455	Neodol 91-8 Storage Tank, Installed in 1994	15,000
EU457	Tote Tank - Perfume Storage, Installed in 1995	300
EU458	DEG Storage Tank, Installation Date Unavailable	500
EU460	C24-5 Surfactant Storage Tank, Installed in 1995	15,000
EU461	HPBCD Cyclodextrin Storage Tank, Installed in 1995	15,000
EU462	Sodium Benzoate Storage Tank, Installed in 1995	15,000
EU464	Effluent Tank, Installed in 1995	15,000
EU465	Line 3 Finished Product Tank, Installed in 2001	7,100
EU466	Line 4 Finished Product Tank, Installed in 2001	7,100
EU467	Liquid Gel Effluent, Installed in 1995	7,400
EU468	Sodium Hypochlorite Solution Storage Tanks (various sizes $\leq 7,400$), Installed in 1995	7,400
EU469	Prism Perfume Storage Tank, Installed in 2000	280
EU470	BSFS/Niagara; Orchard Splash Perfume Storage Tote, Installed in 2000	280
EU471	Nitric Acid Tank with Scrubber, Installed in 2000	280
EU484	Caustic Soda Storage Tank, Installation Date Unavailable	15,000
EU485	Sodium Carbonate/Soda Ash Slurry Storage Tank, Installed in 1994	12,500
EU486	DTPA Storage Tote, Installation Date Unavailable	500
EU487	Artica Perfume Storage Tote, Installed in 2000	280
EU488	Moonstar Perfume Storage Tote, Installed in 2000	280
EU489	CBS(Valencia) Perfume Tote, Installation Date Unavailable	500
EU490	WHIM MCMF Perfume Storage Tote, Installation Date Unavailable	500
EU491	Pine MCP/SSP Perfume Tote, Installation Date Unavailable	500
EU492	Pine MCP/SSP Perfume Tote, Installation Date Unavailable	500
EU493	Deionized Water Tank, Installation Date Unavailable	500
EU494	Line 6 Storage Tank, Installed in 2008	530
EU495	Line 7 Storage Tank, Installed in 2008	520
EU500	Mr. Breeze Color Mix Tank, Installation Date Unavailable	250
EU504	Polymer Filter Tote, Installation Date Unavailable	280
EU505	Polymer Premix Tank (Drum), Installation Date Unavailable	280
EU506	Tote; Bardac 2250; Installation Date Unavailable	280
EU507	Febreze Reblend Tank, Installed in 2000	12,000
EU508	Febreze Reblend Tank, Installed in 2000	12,000
EU509	Perfume Tank, Installed in 2000	280
EU510	Uniquat Tank, Installed in 2000	300
EU512	Pre-Mix Batch Tank, Installed in 2004	290
EU513	Swiffer Finished Product Storage Tank, Installed in 2004	675

Maximum Achievable Control Technology (MACT) Applicability

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

- 1) 40 CFR Part 63, Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers - Area Sources*

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

P&G operates two natural gas-fired boilers with Fuel Oil No. 2 as backup (secondary) that are subject to the Boilers Area Source NESHAP as stated above in Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits section of Statement of Basis. The boilers are classified as large area source boilers as their heat input capacity is greater than or equal to 10 MMBtu/hr.

The Initial notification for existing affected boilers is due by January 20, 2014. The initial Notification of Compliance Status to indicate that an energy assessment has been conducted on the boilers and that the facility has complied with the requirements to conduct initial tune-ups of boilers is due by July 19, 2014. P&G has submitted the initial notification on September 9, 2011 and the initial compliance status on May 18, 2012.

- 2) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The cleaning solvents covered by the MACT standard are solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

The installation operates cold cleaners that use non halogenated solvent as the cleaning solvent. Therefore, the installation is not subject to 40 CFR Part 63, Subpart T

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 tons per year within 40 CFR Part 70. As of July 1, 2011 all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 68,470.06 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Updated Potential to Emit for the Installation

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

Pollutant	Potential to Emit (tons/yr)
CO	42.75
CO _{2e}	68,470.06
PM ₁₀	< 100.00
PM ₂₅	< 100.00
NO _x	60.80
SO _x	67.32

Notes:

- Potential Emissions were calculated based on federally enforceable emission limitations of PM₁₀ of Permit Condition PW001. The limit keeps the potential to emit below major levels, thus allowing the facility to obtain this Intermediate Operating Permit.
- NO_x, SO_x, CO and CO_{2e} emissions are from natural gas and fuel oil combustion of fuel burning units (Boiler #3 and Boiler #4) based on construction permit limit of 762.3 million cubic feet (MMcf) natural gas and 1,890,000 gallons of Fuel Oil No. 2 annually for both boilers.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

This regulation has been included in the operating permit because it applies to any demolition or renovation (as outlined in 40 CFR 61.145) of buildings containing asbestos at the installation.

Other Regulatory Determinations

1) 10 CSR 10-5.540, *Control of Emissions from Batch Process Operation*

The provisions of this rule applies to batch process single unit operations and batch process trains. The Pre-Mix Batch Tank (EU512) process involves mixing a combination of chemicals from the re-used underground storage tanks into the 290 gallon pre-mix batch tank. As a de minimis operation and with the total emissions of less than 500 pounds of VOC, the recordkeeping and reporting requirements of Section 4(A) of this rule apply to this operation.

2) 10 CSR 10-5.500, *Control of Emissions from Volatile Organic Liquid (VOL) Storage*

The provisions of this rule shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of one-half pound per square inch (0.5 psia) or greater in any stationary tank, reservoir or other container of forty thousand (40,000) gallon capacity or greater.

EU401 – Tank #33901, Underground Ethanol Storage Tank is the only unit that is subject to this rule. All other VOL tanks with 40,000 gallon capacity or greater store materials with true vapor of less than 0.5 psia.

3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and

is dependent on the process weight rate material processed excluding liquids and gases used solely as fuels and excluding air introduced for purposes of combustion.

- a) The emission units to which this rule applies are listed below. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate. Process information and data used in these calculations are from the Intermediate Operating Permit Renewal Application and 2011 EIQ. Also, the following formula from 10 CSR 10-6.400 is used to calculate the PM allowable limit:

$$E = 4.10P^{0.67} \text{ for process weight rates up to 30 tons (60,000 lbs) per hour,}$$

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

Where: E = rate of emission in lb/hr; and

P = process weight rate in tons/hr (maximum hourly design rate)

- i) The phosphate and carbonate silos unloading operations (EU101, EU102, EU103 and EU106) and the sulfate storage silo (EU112) listed in the table below are equipped with baghouses. The baghouses associated with these units are an integral part of process operations. The baghouses for these processes are designed to recover material that collects in the baghouse filters and return it back to downstream process equipment via filter blowback. The material recovery is essential for decreasing raw or in-process material costs. Equipment that is inherent to the process operation that achieves emission reduction as a co-benefit is not considered control equipment. The PM potential emissions are calculated considering the baghouses as part of the units and the emission are significantly less than the allowable rate (limit), therefore no monitoring/recordkeeping or reporting requirements for these units.

Emission Unit No.	Maximum Design Rate (ton/hr)	PM Emission Factor ¹ (lb/ton)	PM Potential Emission (lb/hr)	PM Allowable Emission Rate (lb/hr)
EU101	20.00	0.04	0.80	30.51
EU102	20.00	0.04	0.80	30.51
EU103	28.00	0.03	0.84	38.23
EU106	28.00	0.03	0.84	38.23
EU112	8.00	0.0126	0.10	16.51

¹ Source of emission factor: 2011 EIQ

- ii) At maximum design rates, the uncontrolled potential PM emission rates from the units listed below are less than their corresponding allowable PM emission rates. It is highly unlikely that the allowable emission rates will be exceeded, therefore no monitoring/recordkeeping or reporting requirements for these units.

Emission Unit No.	Maximum Design Rate (ton/hr)	Particulate Matter (PM)				
		Control Device Efficiency	Controlled Emission Factor ² (lb/ton)	Uncontrolled Potential Emission	Controlled Potential Emission (lb/hr)	Allowable Emission Rate (lb/hr)
EU178	3.71	98.00%	0.0177	3.28	0.07	9.86
EU180	3.71	98.00%	0.0177	3.28	0.07	9.86
EU181	3.71	98.00%	0.0177	3.28	0.07	9.86
EU182	3.71	98.00%	0.0177	3.28	0.07	9.86

² Source of emission factor: SR09-012

- iii) For the units listed in the table below, the permittee is required to monitor the corresponding emission control equipment and adhere to recordkeeping and reporting requirements. The rationale behind this request is that because the uncontrolled potential emissions are much larger than the corresponding limit. In case of the control equipment failing the installation would very likely emit far in excess of the limit. Periodic monitoring of the equipment will assure its proper working conditions.

Emission Unit No.	Maximum Design Rate (ton/hr)	Particulate Matter (PM)				
		Control Device Efficiency	Controlled Emission Factor (lb/ton)	Uncontrolled Potential Emission	Controlled Potential Emission (lb/hr)	Allowable Emission Rate (lb/hr)
EU128	26.00	99.80%	0.0944 ³	1227.20	2.45	36.38
EU129	6.00	99.80%	0.0618 ³	185.40	0.37	13.62
EU130	0.03	99.00%	1.3048 ³	3.91	0.04	0.39
EU135	8.10	99.50%	0.0235 ³	38.07	0.19	16.65
EU136	7.20	99.50%	0.0236 ³	33.98	0.17	15.39
EU137	7.00	99.50%	0.025 ³	35.00	0.18	15.10
EU138	9.00	99.50%	0.03 ³	54.00	0.27	17.87
EU145	1.40	99.50%	0.579 ⁴	162.12	0.81	5.14
EU501	8.30	99.50%	0.01 ⁵	16.60	0.08	16.93
EU502	3.00	99.00%	0.03 ⁵	9.00	0.09	8.56
EU503	3.00	99.00%	0.03 ⁵	9.00	0.09	8.56

³ Source of emission factor: 2011 EIQ

⁴ Source of emission factor: 2004 EIQ

⁵ Source of emission factor: Engineering calculation

- b) 10 CSR 10-6.400 was not included as an applicable regulation for the emission units listed below. These units are exempt because the particulate matter potential emissions are less than 0.5 pounds per hour per 10 CSR 10-6.400(1)(B)11.

EU144 - South Perborate Admix Receiver Use Bin
EU146 - North Perborate Admix Receiver Use Bin
EU149 - Start-up Reblend Bin
EU170 - Lighthouse Rotoclone
EU175 - Seal Clean Dust Control for Lighthouse
EU195 - Line 15 Platen VAC with Integral Baghouse
EU196 - Line 15 Seal Clean with Integral Baghouse
EU197 - Line 12 Platen VAC with Integral Baghouse
EU198 - Line 12 Seal Clean with Integral Baghouse

- c) According to 10 CSR 10-6.400(1)(B)15, the provisions of this rule shall not apply to any particulate matter emission unit that is subject to a federally enforceable requirement to install, operate and maintain a particulate matter control device system that controls at least ninety percent (90%) of particulate matter emissions. Construction permits issued to these units require P&G to ensure that the dust collectors are in operation at all times while the units are in operation. It is the policy of the Missouri Department of Natural Resources to allow installations to claim a control efficiency of up to 99 percent for a dust collector without a stack test being required. Therefore, because P&G had federally enforceable requirement to operate and maintain a control device, controlling at least 90 percent of particulate emissions on all equipment that emits particulate matter, The units listed below are exempt from 10 CSR 10-6.400.

EU151- Powder Silo Storage System/Old Packing Filter
EU152 - North Making Filter
EU154 -Fifth Filter/Enzyme Filter
EU155 - Packing Central Vacuum System (CVC)
EU157 - Carton Riddling Filter
EU158 - Process Central Vacuum System
EU183 - MDGA Silo - Storage Silo #1
EU184 - Citrate Silo - Storage Silo #2
EU185 - MDGA FRL – Hold Bin #1
EU186 - Citrate FRL – Hold Bin #2
EU187 - North Sulfate FRL – Hold Bin #3
EU188 - South Sulfate FRL – Hold Bin #4
EU189 - Dump Hopper #1 & #2/Hold Bin/Use Bin – Accusol/Disil
EU190 - Bulk Loading System
EU191 - Bulk Unloading System
EU418 - Solution Premix Tank

- 4) Emission Units Without Limitations:

The emission units listed as units without limitations are not subject to any specific rule except the installation wide requirement of Permit Condition PW001 (PM sources) and PW002.

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

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

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

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

Prepared by:

Berhanu A. Getahun
Environmental Engineer

Mr. Frank Blumling
Procter & Gamble Manufacturing Company
169 East Grand Avenue
St. Louis, MO 63147-3123

Re: Procter & Gamble Manufacturing Company, 510-0057
Permit Number: **OP2013-072**

Dear Mr. Blumling:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/bgk

Enclosures

c: St. Louis Regional Office
PAMS File: 2011-05-050

MEMORANDUM

DATE: October 30, 2013

TO: 2011-05-050, Procter & Gamble Manufacturing Company

FROM: Berhanu A. Getahun, Environmental Engineer

SUBJECT: Response to Public Comments

The draft Intermediate Operating Permit for Procter & Gamble Manufacturing Company was public noticed on the Department's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on September 10, 2013 for a 30-day comment period. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.

BAG/kjc