

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: OP2018-047
Expiration Date: JUL 31 2023
Installation ID: 221-0022
Project Number: 2017-02-049

Installation Name and Address

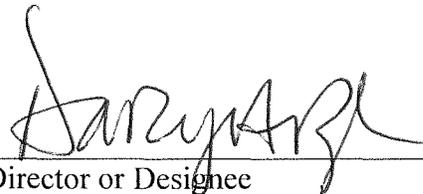
Purcell Tire & Rubber Company
301 North Hall Street
Potosi, MO 63664
Washington County

Installation Description:

Purcell Tire and Rubber Company (Purcell) is a tire processing installation that retreads/recaps medium commercial truck tires, industrial tires, and earth moving tires. The installation's process operations include: removal of rubber (buffing) from used tires, tire grinding, application and curing of new rubber, spray cement application, general solvent usage, and material handling of tires and rubber fragments. The installation has taken a voluntary limit on Hazardous Air Pollutants (HAPs) in order to qualify for this intermediate operating permit. The installation is subject to 40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.



Prepared by:
Kasia Wasescha
Operating Permit Unit



Director or Designee
Department of Natural Resources

JUL 31 2018

Effective Date

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
PERMIT CONDITION PW001.....	4
10 CSR 10-6.065(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)	4
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	5
PERMIT CONDITION 001.....	5
10 CSR 10-6.070 New Source Performance Regulations	5
40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.....	5
PERMIT CONDITION 002.....	5
10 CSR 10-6.060 Construction Permits Required.....	5
Construction Permit 062000-026A, issued June 30, 2000	5
10 CSR 10-6.065(5) Voluntary Limitation(s)	5
PERMIT CONDITION 003.....	6
10 CSR 10-6.060 Construction Permits Required.....	6
Construction Permit 062000-026A, issued June 30, 2000	6
PERMIT CONDITION 004.....	7
10 CSR 10-6.060 Construction Permits Required.....	7
Construction Permit 062000-026A, issued June 30, 2000	7
IV. CORE PERMIT REQUIREMENTS	8
V. GENERAL PERMIT REQUIREMENTS.....	13
VI. ATTACHMENTS	17
ATTACHMENT A.....	18
CombinedHAP Emissions Tracking Record.....	18
ATTACHMENT B.....	19
Individual HAP Emissions Tracking Record.....	19
ATTACHMENT C.....	23
Inspection/Maintenance/Repair/Malfunction Log.....	23
ATTACHMENT D.....	24
Fugitive Emission Observations	24
ATTACHMENT E	25
Visible Emissions Monitoring.....	25
ATTACHMENT F	26
VOC Emissions Tracking Record.....	26

I. Installation Equipment Listing

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 Source	Description	Manufacturer/Model
EP1B	350 hp Boiler (natural gas), constructed 1998 (11.72 MMBtu/hr)	-
EP3	300 hp Boiler (natural gas), constructed 1996 (10.0 MMBtu/hr)	York Shipley/SPH-300-6
EP4	Truck tire buffing (2 grinding machines and 2 skiving stations); 76.6 tires/hr	1. Matteuzzi, Model RAS-98E-ULTRA, 2010 2. Matteuzzi, Model RAS/98E-ULTRA, 2014
EP5	Truck tire building – spray cement application	-
EP6, EP9	General solvent use – including tire patching cement	-
EP7, EP8	OTR tire buffing (6 machines)	1. Nexus, Model ROTR 49", 2001 2. Foam Fil, shop fabricated, 2009 3. MGT, One 63", 2007 4. Cincinnati machine, Model CB 50G HD/072288, April 1988 5. Nexus, Model ROTR 49", 2001 6. Italmatic 63" Buffer, 2016

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Source	Description
EP-10	Curing Chambers
-	10,000 gallon diesel storage tank
-	500 gallon waste oil tank
-	Parts Washer

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations. The following general conditions apply to all units contained in this permit, unless stated otherwise:

Recordkeeping:

- 1) The permittee shall record all required record keeping in an appropriate format.
- 2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
- 3) The permittee shall keep a copy of this operating permit and review on site as well as copies of all issued construction permits and reviews on site.
- 4) All records must be kept for a minimum of five years and be made available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)¹

Emission Limitation:

- 1) The permittee shall discharge into the atmosphere from the entire installation less than 10 tons of any individual hazardous air pollutant (HAP) in any consecutive 12-month period.
- 2) The permittee shall discharge into the atmosphere from the entire installation less than 25 tons of any combination of HAPs in any consecutive 12-month period.

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of individual and combined HAPs emitted into the atmosphere from the entire installation. The permittee shall record the monthly individual and combined HAP emissions with a consecutive 12-month total using Attachments A and B, or equivalent forms for this purpose.

¹ Voluntary limitations must be followed at all times. PW001 allows this facility to operate as an intermediate source.

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.

PERMIT CONDITION 001	
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	
Emission Source	Description
EP1B	350 hp boiler (natural gas), constructed 1998 (11.72 MMBtu/hr)
EP3	300 hp boiler (natural gas), constructed 1996 (10 MMBtu/hr)

Monitoring/Recordkeeping:

- 1) The permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [§60.48c(g)(1)]
- 2) As an alternative, the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month; or [§60.48c(g)(2)]
- 3) The permittee may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]

PERMIT CONDITION 002		
10 CSR 10-6.060 Construction Permits Required Construction Permit 062000-026A, issued June 30, 2000 10 CSR 10-6.065(5) Voluntary Limitation(s) ²		
Emission Source	Description	Control Device
EP4	Truck tire buffing (2 grinding machines and 2 skiving stations); 76.6 tires/hr	Cyclone, Fabric Filters (99.8% control efficiency)
EP7, EP8	6 OTR vehicle tire buffing machines; 12 tires/hr	Cyclone, Fabric Filters (99.8% control efficiency)

Emission Limitation:

The permittee shall not emit any visible emissions from the cyclones and fabric filters at all times. [Voluntary]

Operational Limitation:

- 1) The cyclones and fabric filters associated with EP4, EP7, and EP8 shall be in use at all times when any one or more of the associated tire buffing machines are in operation. [Special Condition 3A; Voluntary]
- 2) The permittee shall operate and maintain the cyclones and fabric filters, along with any related instrumentation or equipment, in accordance with the manufacturer’s specifications. [Special Condition 3A; Voluntary]

² Voluntary limitations must be followed at all times. Voluntary limitations applied to emission sources not permitted under 062000-026A exempt them from 10 CSR 10-6.400.

Monitoring/Recordkeeping:

- 1) The permittee shall inspect the cyclone and fabric filter at least once every six months and at a minimum conduct the following activities: [Special Condition 3B; Voluntary]
 - a) Inspect all components of the control system that are not subject to wear or plugging, including structural components, housing, ducts, hoods, etc.; and
 - b) If leaks or abnormal conditions are found during these inspections, the appropriate remedial actions shall be implemented before re-starting the equipment.
- 2) The permittee shall maintain an operating and maintenance log (Attachment C or an equivalent) for the cyclone and fabric filters, which shall include the following: [Special Condition 3C; Voluntary]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
 - c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection.
- 3) The permittee shall perform daily visible emissions observations (using EPA Method 22) on the cyclones and fabric filters using Attachment E or an equivalent. [Voluntary]

PERMIT CONDITION 003		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 062000-026A, issued June 30, 2000		
Emission Source	Description	Control Device
EP4	Truck tire buffing (2 grinding machines and 2 skiving stations); 76.6 tires/hr	Water Spray
EP7, EP8	6 OTR vehicle tire buffing machines; 12 tires/hr	

Operational Limitation:

- 1) The water spray application on the buffing machines (EP4, EP7, and EP8) shall be in use at all times consistently and correctly when the buffing machines are in operation. [Special Condition 2]
- 2) The water sprays shall be adjusted to operate within a pressure range that provides adequate wetting to effectively control tire buffing surface temperatures to below the threshold at which the tire begins to generate smoke (i.e., begins to thermally decompose, causing the formation and release of VOCs, condensable and otherwise fine, visible particulate matter). [Special Condition 2]
- 3) If smoke is being generated by tire buffing, the permittee shall immediately cease buffing activities until the water spray is functioning correctly as to where no smoke is generated when buffing.
- 4) The water spray system shall be calibrated periodically according to the manufacturer's recommended procedures. [Special Condition 2]

Monitoring/Recordkeeping:

- 1) The water spray system's calibration records shall be kept on site. [Special Condition 2]
- 2) The permittee shall maintain an operating and maintenance log (Attachment C or an equivalent) for the water spray, which shall include the following: [Special Condition 3C]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
 - c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection.

PERMIT CONDITION 004	
10 CSR 10-6.060 Construction Permits Required Construction Permit 062000-026A, issued June 30, 2000	
Emission Source	Description
EP5	Truck tire building – spray cement application
EP6, EP9	General solvent use – including tire patching cement

Emission Limitation:

The permittee shall emit less than 40 tons of volatile organic compounds (VOCs) from EP5, EP6, and EP9 in any consecutive 12-month period. [Special Condition 1A]

Monitoring/Recordkeeping:

The permittee shall monitor and record monthly and 12-month rolling total VOC emissions using Attachment F or an equivalent form. [Special Condition 1D]

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 are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 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.
- 4) 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.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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

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

Emission Limitation:

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

Monitoring:

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

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment D, or its equivalent, noting the following:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

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

V. General Permit Requirements

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

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

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - 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, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 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)

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

10 CSR 10-6.065(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 semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and 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 record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This 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)34 Responsible Official

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment A
Combined HAP Emissions Tracking Record

This attachment is to show compliance with Permit Condition PW001.

This sheet covers the month of _____ in the year _____.

Material Used from EP5, EP6, and EP9 (Solvents, Glue, Paints, etc.)	Monthly Amount of Material Used (include units)	Density (lb/gal)	Combined HAP Content ³ (weight %)	Monthly Combined HAP Emissions ⁴ (tons)
Emission Point & Description	Monthly Throughput	Combined HAP Emission Factor	Source (SCC)	Monthly Combined HAP Emissions (tons)
EP1B and EP3 Boilers	mmcf	1.8885 lb/mmcf	10200602	
EP-10 Tire Curing	lb rubber ⁵	8.53E-05 lb/lb rubber	30800107	
Storage Tank (diesel)	3.33 1000gal	-	VOC Analysis ⁶	5.67E-02
Storage Tank (waste oil)	100 gal	-	Oil Analysis ⁷	1.13E-04
Monthly Combined HAP Emissions (tons)⁸:				
12-Month Rolling Total Combined HAP Emissions (tons)⁹:				

³ Combined HAP content should be obtained from the SDS sheet as the sum of all individual HAP contents. If a range of individual HAP contents is given, use the largest value in the range.

⁴ If usage is in tons: [Amount of Material Used] × [HAP Content] = [HAP Emissions]
 If usage is in pounds: [Amount of Material Used] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]
 If usage is in gallons: [Amount of Material Used] × [Density] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]

⁵ Rubber applied for retreading tires.

⁶ Refers to *VOC composition of current motor vehicle fuels and vapors, and collinearity analyses for receptor modeling*. Feb 11, 2015. Jo-Yu Chin and Stuart A. Batterman.

⁷ Refers to *Vermont Used Oil Analysis and Waste Oil Furnace Emissions Study*. September 1994. Revised March 1996. Prepared by Vermont Agency of Natural Resources.

⁸ Monthly Combined HAP emissions (tons) = the sum of each emission sources Monthly Combined HAP emissions (tons). The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

⁹ 12-Month Rolling Total Combined HAP Emissions = the sum of the 12 most recent Monthly Combined HAP Emissions. 12-Month Rolling Total Combined HAP Emissions of less than 25.0 tons indicates compliance.

Attachment B
Individual HAP Emissions Tracking Record

This attachment is to show compliance with Permit Condition PW001.

This sheet covers the month of _____ in the year _____.

Material Used from EP5, EP6, and EP9 (Name, HAP, CAS #)	Monthly Amount of Material Used (include units)	Density (lb/gal)	Combined HAP Content¹⁰ (weight %)	Monthly Individual HAP Emissions¹¹ (tons)
HAPs from EP1B and EP3 Boilers (Name, HAP CAS #)	Monthly Throughput (mmcf)	Individual HAP Emission Factor (lb/mmcf)	Source (SCC)	Monthly Individual HAP Emissions (tons)
2-Methylnaphthalene (91-57-6)		2.4E-05	10200602	
3-Methylchlorantherene (56-49-5)		1.8E-06	10200602	
7,12-Dimethylbenz(a)anthracene (56-49-5)		1.6E-05	10200602	
Acenaphthene (83-32-9)		1.8E-06	10200602	
Acenaphthylene (203-96-8)		1.8E-06	10200602	
Anthracene (120-12-7)		2.4E-06	10200602	
Benz(a)anthracene (56-55-3)		1.8E-06	10200602	
Benzene (71-43-2)		2.1E-03	10200602	

¹⁰ Individual HAP content should be obtained from the SDS sheet as the sum of all individual HAP contents. If a range of individual HAP contents is given, use the largest value in the range.

¹¹ If usage is in tons: [Amount of Material Used] × [HAP Content] = [HAP Emissions]
 If usage is in pounds: [Amount of Material Used] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]
 If usage is in gallons: [Amount of Material Used] × [Density] × [HAP Content] / [2000 lb/ton] = [HAP Emissions]
 The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

Benzo(a)pyrene (50-32-8)		1.2E-06	10200602	
Benzo(b)fluoranthene (205-99-2)		1.8E-06	10200602	
Benzo(g,h,i)perylene (191-24-2)		1.2E-06	10200602	
Benzo(k)fluoranthene (207-08-9)		1.8E-06	10200602	
Chrysene (218-01-9)		1.8E-06	10200602	
Dibenzo(a,h)anthracene (53-70-3)		1.2E-03	10200602	
Fluoranthene (206-44-0)		3.0E-06	10200602	
Fluorene (86-73-7)		2.8E-06	10200602	
Formaldehyde (50-00-0)		7.5E-02	10200602	
Hexane (110-54-3)		1.8E+00	10200602	
Indeno(1,2,3-cd)pyrene (193-39-5)		1.8E-06	10200602	
Naphthalene (91-20-3)		6.1E-04	10200602	
Phenanathrene (85-01-8)		1.7E-05	10200602	
Pyrene (129-00-0)		5.0E-06	10200602	
Toluene (108-88-3)		3.4E-03	10200602	
HAPs from EP-10 Tire Curing (Name, HAP CAS #)	Monthly Throughput⁵ (lb rubber)	Individual HAP Emission Factor (lb/lb rubber)	Source (SCC)	Monthly Individual HAP Emissions (tons)
1,1,1-Trichloroethane (71-55-6)		2.41E-07	30800107	
1,1,2,2-Tetrachloroethane (79-34-5)		1.03E-07	30800107	
1,1-Dichloroethane (75-34-3)		7.96E-08	30800107	
1,1-Dichloroethene (75-35-4)		5.85E-07	30800107	
1,2,4-Trichlorobenzene (120-82-1)		2.59E-09	30800107	
1,2-Dibromo-3-Chloropropane (96-12-8)		2.06E-07	30800107	
1,4-Dichlorobenzene (106-46-7)		6.79E-07	30800107	
2-Butanone (78-93-3)		1.55E-06	30800107	
2-Chloroacetophenone (532-27-4)		1.28E-09	30800107	
2-Methylphenol (95-48-7)		9.00E-09	30800107	
4-Methyl-2-Pentanone (108-10-1)		1.32E-05	30800107	
Acetophenone (98-86-2)		1.20E-07	30800107	
Acrolein (107-02-8)		1.28E-07	30800107	
Aniline (62-53-3)		4.36E-06	30800107	
Benzene (71-43-2)		4.78E-07	30800107	
Benzyl Chloride (100-44-7)		4.42E-08	30800107	
Biphenyl (92-52-4)		6.78E-08	30800107	
bis(2-Ethylhexyl)phthalate (117-81-7)		5.92E-07	30800107	
Bromomethane (74-83-9)		9.15E-08	30800107	
Carbon Disulfide (75-15-0)		1.32E-05	30800107	
Carbonyl Sulfide (463-58-1)		5.44E-07	30800107	
Chloroform (67-66-3)		2.17E-08	30800107	
Chloromethane (74-87-3)		6.49E-08	30800107	

Cumene (98-82-8)		4.75E-07	30800107	
Di-n-butylphthalate (84-74-2)		9.49E-07	30800107	
Dibenzofuran (132-64-9)		9.81E-09	30800107	
Dimethylphthalate (131-11-3)		9.60E-08	30800107	
Dibenzofuran (132-64-9)		9.81E-09	30800107	
Dimethylphthalate (131-11-3)		9.60E-08	30800107	
Ethylbenzene (100-41-4)		1.03E-05	30800107	
Hexane (110-54-3)		3.04E-06	30800107	
Isophorone (78-59-1)		2.06E-08	30800107	
m-Xylene + p-Xylene (108-38-3 + 106-42-3)		3.36E-05	30800107	
Methylene Chloride (75-09-2)		5.62E-06	30800107	
Naphthalene (91-20-3)		2.01E-07	30800107	
o-Toluidine (95-53-4)		1.01E-07	30800107	
o-Xylene (95-47-6)		8.74E-06	30800107	
Phenol (108-95-2)		4.64E-07	30800107	
Styrene (100-42-5)		3.98E-06	30800107	
t-Butyl Methyl Ether (1634-04-4)		3.04E-07	30800107	
Tetrachloroethene (127-18-4)		2.13E-07	30800107	
Toluene (108-88-3)		1.65E-05	30800107	
Trichloroethene (79-01-6)		3.68E-08	30800107	
HAPs from Diesel Storage Tank (Name, HAP CAS #)	Monthly Throughput¹² (1000gal)	Individual HAP Composition (mg/L)	Source	Monthly Individual HAP Emissions (tons)
Benzene (71-43-2)	3.33	67	VOC Analysis	9.31E-04
Toluene (108-88-3)	3.33	238	VOC Analysis	3.31E-03
Ethylbenzene (100-41-4)	3.33	124	VOC Analysis	1.72E-03
p-Xylene, m-Xylene (106-42-3 & 108-38-3)	3.33	420	VOC Analysis	5.84E-03
o-Xylene (95-47-6)	3.33	185	VOC Analysis	2.57E-03
Cumene (98-82-8)	3.33	44	VOC Analysis	6.11E-04
Styrene (100-42-5)	3.33	0.02	VOC Analysis	2.78E-07
Naphthalene (91-20-3)	3.33	3000	VOC Analysis	4.17E-02
HAPs from Waste Oil Storage Tank (Name, HAP CAS #)	Monthly Throughput (gal)	Individual HAP Emission Content (ppm)	Source	Monthly Individual HAP Emissions¹³ (tons)
Arsenic Compounds	100	2	Oil Analysis	7.52E-07
Beryllium Compounds	100	0.02	Oil Analysis	7.52E-09
Cadmium Compounds	100	2.34	Oil Analysis	8.78E-07
Chromium Compounds	100	3.91	Oil Analysis	1.47E-06

¹² Based on bulk annual fuel purchase of 40,000 gallons.

¹³ Calculations based off of HAP content in ppm and assumes a monthly throughput. Assumes a waste oil density of 0.9 g/cm³.

Attachment F
VOC Emissions Tracking Record

This attachment is to show compliance with Permit Condition 004.

This sheet covers the month of _____ in the year _____.

Emission Source¹⁶	Solvent Name	Monthly Throughput	Density¹⁷ (lb/gal)	VOC Content¹⁸ (wt%)	VOC Emissions¹⁹ (tons)
		gal			
Sum of Monthly VOC Emissions (tons)²⁰:					
12-Month Rolling Total VOC Emissions (tons)²¹:					

¹⁶ Track VOC emissions from EP5, EP6, and EP9.
¹⁷ From the SDS sheet. If specific gravity is given, multiply it by 8.33 to get density.
¹⁸ From the SDS sheet. If a range is given, use the highest value in the range.
¹⁹ [Throughput] × [Density] × [VOC Content] / [2000 lb/ton] = [VOC Emissions]
²⁰ This is the sum of VOC emissions from each solvent used and shall include start-up, shutdown, and malfunction (SSM) emissions as reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.
²¹ 12-Month Rolling Total VOC emissions = the sum of the 12 most recent Monthly VOC Emissions. 12-Month Rolling Total VOC Emissions less than 40.0 tons indicates compliance.

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.

INSTALLATION DESCRIPTION

Purcell Tire and Rubber Company (Purcell) is a tire processing installation that retreads/recaps medium commercial truck tires, industrial tires, and earth moving tires. The installation's process operations include: removal of rubber (buffing) from used tires, tire grinding, application and curing of new rubber, spray cement application, general solvent usage, and material handling of tires and rubber fragments. The installation has taken a voluntary limit on Hazardous Air Pollutants (HAPs) in order to qualify for this intermediate operating permit. The installation is subject to 40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ²²
PM ₁₀	9.68
PM _{2.5}	9.68
CO	7.83
NO _x	9.33
SO _x	0.06
VOCs	40.51
HAPs	< 10/25

²² Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

- VOC emissions takes in account the 40 ton/yr limit on EP5, 6, and 9 and excludes emissions from the storage tanks.
- The facility will emit less than the 10/25 HAP limit due to limitations from Permit Condition PW001.
- VOC emissions are below major levels due to the requirement to use the water spray on tire buffing activities. See Construction Permit 062000-026A for more information.
- PM₁₀ and PM_{2.5} emissions take in account federally enforceable control devices on EP4, EP7, and EP8.
- VOCs from the parts washer solvent were not included in the PTE.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.98	0.98	0.98	1.06	1.06
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.41	0.41	0.41	0.44	0.44
Sulfur Oxides (SO _x)	0.01	0.01	0.01	0.01	0.01
Nitrogen Oxides (NO _x)	1.35	1.35	1.35	1.40	1.40
Volatile Organic Compounds(VOC)	12.96	12.96	12.96	12.32	12.32
Carbon Monoxide (CO)	1.14	1.14	1.14	1.18	1.18
Hazardous Air Pollutants ²³ (HAPs)	--	--	--	--	--
Toluene (108-88-3)	1.72	1.72	1.72	1.43	1.43
N-Hexane (110-54-3)	0.16	0.16	0.16	0.14	0.14

Permit Reference Documents

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

1. Intermediate Operating Permit Application, received February 21, 2017
2. 2016 Emissions Inventory Questionnaire, received March 17, 2017
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
4. Construction Permit 0798-027, issued June 18, 1998
5. Construction Permit 0998-008, issued July 31, 1998
6. Construction Permit 062000-026, issued June 9, 2000
7. Construction Permit 062000-026A, issued June 30, 2000
8. Construction Permit 2000-01-016, completed February 22, 2000
9. Construction Permit 0998-008A, completed July 25, 2003

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

²³ HAPs were reported as VOC or PM₁₀ in the EIQ.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

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

These regulations do not apply to the boilers because they burn only natural gas per 10 CSR 10-6.260(1)(A)2 and 10 CSR 10-6.261(1)(A).

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

This regulation does not apply to the tire grinding operations (EP4, EP7, and EP8) because they have a federally enforceable requirement to operate the control devices to achieve at least 90 percent control of particulate matter emissions per 10 CSR 10-6.400(1)(A)15.

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

This rule is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installations that are fueled exclusively by natural gas.

Construction Permit History

Construction Permit 0798-027, issued June 18, 1998

This permit was issued to authorize the installation of a 300 HP (10.04 MMBtu/hr) natural gas fired boiler. There are no special conditions in this permit.

Construction Permit 0998-008, issued July 31, 1998

This permit was issued to authorize the replacement of a 150 HP (6.4 MMBtu/hr) natural gas fired boiler with a 350 HP (11.72 MMBtu/hr) natural gas fired boiler. There are no special conditions in this permit.

Construction Permit 062000-026, issued June 9, 2000

This permit was issued to authorize the installation of truck buffing lines and a spray cement application. This permit has been replaced by Construction Permit 062000-026A.

No Permit Required Project No. 2000-01-016, completed February 22, 2000

This project authorizes the installation of a cyclone between the tire buffers and the existing trailer used for PM₁₀ emissions control. The tire buffers have existing filters and the cyclone was installed before the filters to reduce the volume and pressure of air being blown into the trailer. This reduces the amount of particles being carried through the fabric filters. The cyclone will be a pre-filter and will reduce the emissions and extend the life of the filters. Since there is no emissions increase, a construction permit is not required.

Construction Permit 062000-026A, issued June 30, 2000

This permit was issued to amend Construction Permit 062000-026. This permit replaces permit 062000-026 and contains special conditions which appear in this operating permit. All VOC emissions from solvents associated with EP-10 Curing Chambers is taken in account in EP5, EP6, and EP9.

- Special Condition 1 limits VOC and HAP emissions from the installation and requires monitoring/recordkeeping. This condition has been incorporated into this operating permit.
- Special Condition 2 requires use water spray application on the buffing machines. It has been added to this operating permit.
- Special Condition 3 requires use of a cyclone on EP4, along with associated monitoring/recordkeeping requirements. It has been added to this operating permit.
- Special Condition 4 is an ambient air requirement for nuance PM₁₀ emissions beyond the property boundary. This condition was not included in this operating permit due to 10 CSR 10-6.170 being more stringent.
- Special Condition 5 requires stack testing on the emission control devices for the tire buffing lines. This testing was completed on January 10, 2001, and was accepted by the Air Pollution Control Program on March 12, 2001. The results indicate that the maximum hourly design rate is 76.6 tires/hr, with an emission rate of 0.014 lbs PM₁₀/tire, after the cyclone. This construction permit contains appendices which explain the development of emission factors for these processes. These emission factors and associated control device efficiencies were used in the development of this operating permit.

Construction Permit 0998-008A, completed July 25, 2003

The installation submitted a request to include an alternate compliance method for 40 CFR Part 60, Subpart Dc – Standards of Performance of Small Industrial-Commercial-Institutional Steam Generating Units. This project number was created to document the submittal. The request itself was forwarded to the Air Pollution Control Program’s Compliance/Enforcement Section, and was approved. The original Construction Permit 0998-008 was not changed. This construction permit has no special conditions.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart BBB – *Standards of Performance for the Rubber Tire Manufacturing Industry*

This subpart does not apply. This standard applies to the affected facilities identified in §60.540(a) which are located in rubber tire manufacturing plants. A “tire” is defined in NSPS BBB as any agricultural, airplane, industrial, mobile home, light duty truck and/or passenger vehicle tire that has a bead diameter less than or equal to 0.5 meters (19.7 inches) and a cross section dimension less than or equal to 0.325 meters (12.8 inches), and that is mass produced in an assembly-line fashion. Based on a review of the background documents for NSPS BBB, the types of operations evaluated in the development of the standard were those associated with the production of new tires. New tire manufacturing is described as consisting of the production of component parts of tires, the assembly of those components into a raw “green” tire, curing, and finishing to yield a complete tire. A “green tire” is defined in the rule as an assembled, uncured tire. If a facility only retreads used tires, it is not considered a rubber tire manufacturing plant and is not regulated by NSPS BBB. (See EPA Applicability Determination Index Document Control #0500031) Because this installation only retreads used tires, this subpart does not apply.

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

The boilers at this installation only combust natural gas, therefore they are only subject to the requirements to keep fuel records. The installation has requested alternative methods to show compliance with this rule, which has been approved by MoDNR. See Construction Permit 0998-008A.

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, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 19, 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*

These subparts do not apply to the storage tanks. The smallest size tank covered by these regulations is 19,813 gallons. The storage tanks at this installation have capacities less than the applicability threshold.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart XXXX – *National Emissions Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing*

This subpart does not apply. The production of retread tires would be subject to MACT XXXX if the facilities were located at, or were a part of, a major source of HAP emissions (§63.5981).

Discussions concerning retread tire facilities are found in the preamble to MACT XXXX (Federal Register Vol. 67, No. 131, July 9, 2002, pages 45,590-45,591). The preamble states that tire retread operations are included in the tire production category considered in the development of MACT XXXX and are subject to that standard if they meet the applicability criteria. However, the installation has federally enforceable limitations that limit HAP emissions to less than major source thresholds. Since the installation is not a major source of HAP this rule does not apply.

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

This subpart does not apply. Natural gas fired boilers are not subject to this regulation per §63.11195(e).

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning*

This subpart does not apply. The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), 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 does not use any of these solvents, therefore this regulation does not apply.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

This subpart does not apply. The installation does not perform spray application of coatings to motor vehicles and mobile equipment (tires do not meet the definition of mobile equipment in the subpart).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Greenhouse Gas Emissions

The installation is 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.

Other Regulatory Determinations

10 CSR 10-6.220, Restriction of Visible Air Contaminants

This regulation applies to the installation. EP1B and EP3 Boilers are exempt due to being fueled by natural gas. While applicable to EP4, EP7, and EP8, they are subject to a more stringent visibility limitation. In order to streamline this operating permit, this rule was not included.

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 APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

Comments were received by Purcell Tire & Rubber Company on May 3, 2018. The comments are addressed in the order in which they appear within the email.

Comment #1:

The draft permit references special conditions added to the facility permit 062000-026A, I would ask for the facility to include these Special Conditions in the Operating Permit.

Response to Comment #1:

The special conditions in 062000-026A are incorporated into the permit conditions of this operating permit.

Comment #2:

Foot note 1 on Page 5 of the Draft, I would ask the state to clarify as “Voluntary allow this facility to operate as an intermediate source and limitations must be followed at all times.”

Response to Comment #2:

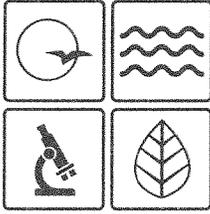
The voluntary limitations in Permit Condition 002 in which footnote 2 (formerly footnote 1) refers to are intended to exempt all the emission units of the permit condition from 10 CSR 10-6.400 rather than for the installation to keep intermediate operating permit status. Permit Condition PW001 requires this installation to operate at an intermediate operating level. Footnote 1 has been added to Permit Condition PW001 to state that its limitation gives the facility its intermediate status. Footnote 2 (formerly footnote 1) has been modified stating its purpose.

Comment #3:

On Page 6 of the Draft the facility is now required to perform daily visible emissions observations, I could not find this in the previous permit. There was a requirement for Method 22 observations, which slowly decrease as time passes and emissions are not observed. This condition is the primary reason why I would ask for the Special Conditions to be included, in full, in this current permit. From the 2012 permit to this draft Special Condition 3 (A, B and C), went from requiring straight forward maintenance and operating requirements to daily observations to requiring daily observations. Not the draft did not include which method would be necessary for the daily observations, if any method at all.

Response to Comment #3:

The visible emissions monitoring is a new condition in order to demonstrate that the control devices are operating correctly. Daily observations are required to demonstrate compliance with the permit condition limitation; observation frequency does not change with time. Method 22 observations would be required. The permit condition has been updated stating the required observation method. As addressed in Response to Comment #1, the special conditions of the construction permits have been incorporated into the operating permit.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUL 31 2018

Mr. Brian Hayes
Purcell Tire & Rubber Company
PO Box 100
Potosi, MO 63664

Re: Purcell Tire & Rubber Company, 221-0022
Permit Number: OP2018-047

Dear Mr. Hayes:

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.

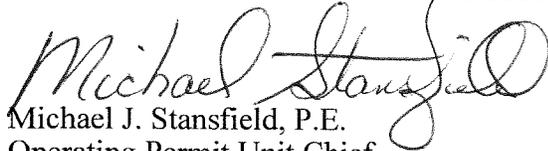
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (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 contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:kwj

Enclosures

c: PAMS File: 2017-02-049



Recycled paper