



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2011-008
Expiration Date: MAR 01 2016
Installation ID: 091-0037
Project Number: 2007-05-010

Installation Name and Address

Royal Oak Enterprises, LLC - West Plains Briquet Plant
6425 County Highway ZZ
West Plains, MO 65775
Howell County

Parent Company's Name and Address

Royal Oak Enterprises, LLC
P.O. Box 850
West Plains, MO 65775

Installation Description:

Royal Oak Enterprises, LLC – West Plains Briquet Plant pulverizes and blends raw materials to form charcoal briquets. Raw materials include coal fines, limestone, raw charcoal, sawdust, and starch. The installation does not include a charcoal kiln or any limestone crushing operations. The installation is a synthetic minor source of PM₁₀ located in an attainment area for all criteria pollutants.

MAR 02 2011

Effective Date

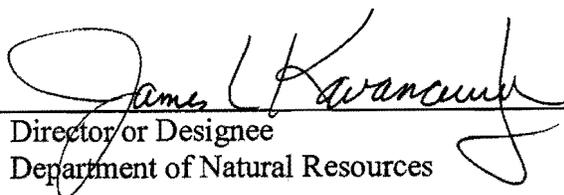

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
II. PLANT WIDE EMISSION LIMITATIONS.....	6
PERMIT CONDITION PW001	6
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	6
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	7
PERMIT CONDITION 001	7
10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating	7
PERMIT CONDITION 002	8
10 CSR 10-6.060 Construction Permits Required.....	8
Construction Permit 022002-008, Issued February 14, 2002.....	8
PERMIT CONDITION 003	9
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	9
PERMIT CONDITION 004	10
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	10
PERMIT CONDITION 005	12
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes	12
PERMIT CONDITION 006	14
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	14
IV. CORE PERMIT REQUIREMENTS	16
V. GENERAL PERMIT REQUIREMENTS.....	23
VI. ATTACHMENTS	27
ATTACHMENT A	28
Fugitive Emission Observations	28
ATTACHMENT B	29
Opacity Emission Observations	29
ATTACHMENT C	30
Method 9 Opacity Emissions Observations	30
ATTACHMENT D	31
Inspection/Maintenance/Repair/Malfunction Log	31
ATTACHMENT E	32
10 CSR 10-3.060 Compliance Demonstration.....	32
ATTACHMENT F	33
Construction Permit 022002-008.....	33
PM ₁₀ Compliance Worksheet.....	33
ATTACHMENT G1	34
Plantwide PM ₁₀ Compliance Worksheet	34
ATTACHMENT G2.....	35
Plantwide PM ₁₀ Compliance Worksheet Continued	35
ATTACHMENT H.....	36
10 CSR 10-6.260 Compliance Demonstration.....	36
ATTACHMENT I	37
10 CSR 10-6.400 Compliance Demonstration.....	37

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Royal Oak Enterprises, LLC – West Plains Briquet Plant pulverizes and blends raw materials to form charcoal briquets. Raw materials include coal fines, limestone, raw charcoal, sawdust, and starch. The installation does not include a charcoal kiln or any limestone crushing operations. The installation is a synthetic minor source of PM₁₀ located in an attainment area for all criteria pollutants.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM ₁₀)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)	Particulate Matter ≤ 2.5 Microns (PM _{2.5})
2009	34.75	1.49	29.14	2.91	35.68	0.003	1.46	15.88
2008	32.45	1.23	24.05	2.45	29.45	0.002	1.20	12.27
2007	30.30	1.17	22.92	2.72	28.06	0.002	1.15	11.69
2006	35.60	1.30	26.01	2.80	31.62	0.003	1.27	13.01
2005	36.64	1.27	25.32	2.98	30.79	-	1.24	12.68

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
EP-04	Charcoal Storage
EP-06	Load Hopper - Charcoal And Coal
EP-07	Hopper Loadout - Charcoal And Coal
EP-08	Conveying - Charcoal And Coal
EP-09	Hammermill - Charcoal And Coal
EP-13	Load Hopper - Sawdust
EP-16	Hammermill - Sawdust
EP-28	Conveying-Mixture (3)
EP-29	Press
EP-31A	Briquette Dryer/Cooler - Process Emissions
EP-31B	Briquette Dryer/Cooler - Sawdust Combustion Emissions
EP-33	Conveying (4)
EP-39	Bagging Briquettes (2)
EP-53	Natural Gas Space Heating (7 units)
EP-54	Natural Gas Starch Boiler
EP-56	Load Sawdust Hopper
EP-57	Screw Conveyor
EP-58	Sawdust Hammermill
EP-59	Screw Conveyor

Emission Unit	Description
EP-60	Hopper Loadout
EP-61	(5) Screw Conveyors
EP-62	Charcoal Silo Loading
EP-63	Coal Silo Loading
EP-64	Retort Silo Loading
EP-65	Mesquite Silo Loading
EP-66	Lime Silo Pneumatic Loading
EP-67	Starch Silo Pneumatic Loading
EP-69	Conveying
EP-71	Mesquite Load Out Vibrator
EP-72	Briquet Storage Bin Loading
EP-73	Load Out Vibrator
EP-74	Shaker
EP-75	Conveyor
EP-76	Conveyor
EP-78	Scale
EP-79	Load Out Vibrator
EP-80	Conveyor
EP-81	Scale
EP-82	Sawdust Storage Pile
EP-83	Natural Gas Wax Boiler

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
EP-01	Coal Storage
EP-02	Sawdust Storage
EP-03	Mesquite Storage
EP-05	Lime Storage
EP-25	Sodium Nitrate Mixer
EP-26	Borax Hopper
EP-27	Paddle Mixer
EP-32	Fines Screening & Conveying
EP-37	Instant Lite Dip Tank
EP-38	Dip Tank Loadout
EP-50	Lighter Fluid Bottling
EP-51	Mineral Spirits Storage Tanks – (2) 25,000 gallon, (5) 20,000 gallon, and (1) 15,000 gallon
EP-52	Diesel Fuel Tank – 500 gallon
EP-68	Shaker
EP-70	Fines Storage Pile
EP-77	Conveyor

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

Emission Limitation:

The permittee shall emit less than 100 tons of Particulate Matter less than or equal to ten microns (PM₁₀) per consecutive 12-month period from the entire installation.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of monthly usage for each PM₁₀ emission unit.
2. The monthly emissions of PM₁₀ for each emission unit shall be calculated using Attachments G1 and G2 or equivalent forms created by the permittee.
3. The permittee shall calculate their annual emission of PM₁₀ by summing the monthly emissions of each emission unit for the last twelve months. The annual emission will be calculated each month using the most recent twelve months worth of monthly emission totals.
4. Records may be kept electronically or on paper.
5. All records shall be kept on-site for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001		
10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating		
Emission Unit	Description	Maximum Hourly Design Rate (MMBtu/hr)
EP-53	Natural Gas Space Heating (7 units)	4.01
EP-54	Natural Gas Starch Boiler	2.25
EP-83	Natural Gas Wax Boiler	4.50

Emission Limitations:

The permittee shall not emit particulate matter in excess of 0.60 pounds per million BTU of heat input from each of these indirect heating sources.

Operational Limitation:

The permittee shall maintain and operate the equipment according to the manufacturer's specifications and recommendations.

Recordkeeping:

1. Attachment E demonstrates the facility's compliance with this regulation and should be kept on site at all times.
2. All inspections, corrective actions, and instrument calibrations shall be recorded using Attachment D or an equivalent form generated by the permittee.
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five (5) years.

Reporting:

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

PERMIT CONDITION 002	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit 022002-008, Issued February 14, 2002	
Emission Unit	Description
EP-56	Load Sawdust Hopper
EP-57	Screw Conveyor
EP-58	Sawdust Hammermill
EP-59	Screw Conveyor
EP-60	Hopper Loadout
EP-61	(5) Screw Conveyors
EP-82	Sawdust Storage Pile

Emission Limitation:

Special Condition 1.A: The permittee shall not discharge into the atmosphere PM₁₀ in excess of 15 tons in any consecutive 12-month period from the following emission points: Load Sawdust Hopper (EP-56), Screw Conveyor (EP-57), Sawdust Hammermill (EP-58), Screw Conveyor (EP-59), Hopper Loadout (EP-60), (5) Screw Conveyors (EP-61), and Sawdust Storage Pile (EP-82).

Monitoring/Recordkeeping:

Special Condition 1.B: Attachment F or an equivalent form approved by the Air Pollution Control Program shall be used to demonstrate compliance with the 15 tons PM₁₀ emission limitation. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. Special Condition 1.C: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which records indicate that the sources has exceeded the 15 ton emission limitation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003						
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants						
Emission Unit	Description	Stack No.		Emission Unit	Description	
EP-31A	Briquette Dryer/Cooler	EP-31		EP-04	Charcoal Storage	
EP-31B				EP-06	Load Hopper - Charcoal And Coal	
EP-09	Hammermill - Charcoal And Coal	S-1		EP-07	Hopper Loadout - Charcoal And Coal	
EP-16	Hammermill -Sawdust			EP-08	Conveying - Charcoal And Coal	
EP-33	Conveying (4)			EP-13	Load Hopper - Sawdust	
EP-62	Charcoal Silo Loading			EP-28	Conveying-Mixture (3)	
EP-63	Coal Silo Loading			EP-29	Press	
EP-64	Retort Silo Loading			EP-39	Bagging Briquettes (2)	
EP-65	Mesquite Silo Loading			EP-56	Load Sawdust Hopper	
EP-71	Mesquite Load Out Vibrator			EP-57	Screw Conveyor	
EP-72	Briquet Storage Bin Loading		S-2		EP-59	Screw Conveyor
EP-73	Load Out Vibrator				EP-60	Hopper Loadout
EP-74	Shaker				EP-61	(5) Screw Conveyors
EP-75	Conveyor			EP-69	Conveying	
EP-76	Conveyor					
EP-78	Scale					
EP-79	Load Out Vibrator					
EP-80	Conveyor					
EP-81	Scale					
EP-66	Lime Silo Pneumatic Loading	S-3				
EP-67	Starch Silo Pneumatic Loading	S-4				

Emission Limitation:

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

Monitoring:

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

3. If the source reverts to daily monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

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

Reporting:

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

PERMIT CONDITION 004	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
Emission Unit	Description
EP-31B	Briquette Dryer/Cooler - Sawdust Combustion Emissions

Emission Limitations:

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

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

Monitoring/Record Keeping:

- Attachment H demonstrates the facility’s compliance with this regulation and should be kept on site at all times.
- All inspections, corrective actions, and instrument calibrations shall be recorded using Attachment D or an equivalent form generated by the permittee.
- These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- All records shall be maintained for five (5) years.

Reporting:

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

PERMIT CONDITION 005		
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes		
Emission Unit	Description	Control Device No.
EP-04	Charcoal Storage	CD-02 Enclosure
EP-06	Load Hopper - Charcoal And Coal	
EP-07	Hopper Loadout - Charcoal And Coal	
EP-08	Conveying - Charcoal And Coal	
EP-09	Hammermill - Charcoal And Coal	CD-03 Fabric Filter
EP-13	Load Hopper - Sawdust	CD-02 Enclosure
EP-16	Hammermill -Sawdust	CD-03 Fabric Filter
EP-28	Conveying-Mixture (3)	CD-10 Documented Moisture Content
EP-29	Press	
EP-31A	Briquette Dryer/Cooler - Process Emissions	EP-31
EP-33	Conveying (4)	CD-03 Fabric Filter
EP-39	Bagging Briquettes (2)	CD-02 Enclosure
EP-56	Load Sawdust Hopper	CD-01 Partial Enclosure
EP-60	Hopper Loadout	
EP-62	Charcoal Silo Loading	CD-03 Fabric Filter
EP-63	Coal Silo Loading	
EP-64	Retort Silo Loading	
EP-69	Conveying	CD-10 Documented Moisture Content
EP-72	Briquet Storage Bin Loading	CD-06 Fabric Filter
EP-73	Load Out Vibrator	
EP-74	Shaker	
EP-75	Conveyor	
EP-76	Conveyor	
EP-78	Scale	
EP-79	Load Out Vibrator	
EP-80	Conveyor	
EP-81	Scale	

Emission Limitation:

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

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

Emission Unit	Description	Limit (lb/h)	Emission Unit	Description	Limit (lb/h)
EP-04	Charcoal Storage	19.18	EP-62	Charcoal Silo Loading	24.60
EP-06	Load Hopper - Charcoal And Coal	24.60	EP-63	Coal Silo Loading	24.60
EP-07	Hopper Loadout - Charcoal And Coal	24.60	EP-64	Retort Silo Loading	12.05
EP-08	Conveying - Charcoal And Coal	24.60	EP-69	Conveying	41.58
EP-09	Hammermill - Charcoal And Coal	24.60	EP-72	Briquet Storage Bin Loading	21.67
EP-13	Load Hopper - Sawdust	12.05	EP-73	Load Out Vibrator	22.86
EP-16	Hammermill -Sawdust	12.05	EP-74	Shaker	22.86
EP-28	Conveying-Mixture (3)	34.48	EP-75	Conveyor	22.86
EP-29	Press	21.67	EP-76	Conveyor	16.10
EP-31A	Briquette Dryer/Cooler - Process	21.67	EP-78	Scale	22.86
EP-33	Conveying (4)	44.20	EP-79	Load Out Vibrator	19.18
EP-39	Bagging Briquettes (2)	33.51	EP-80	Conveyor	19.18
EP-56	Load Sawdust Hopper	5.80	EP-81	Scale	19.18
EP-60	Hopper Loadout	5.80			

Monitoring/Record Keeping:

1. Attachment I demonstrates the facility’s compliance with this regulation and should be kept on site at all times.
2. All inspections, corrective actions, and instrument calibrations shall be recorded using Attachment D or an equivalent form generated by the permittee.
3. The calculation shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
4. All records shall be kept for a period of five (5) years.

Reporting:

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

PERMIT CONDITION 006			
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)			
Emission Unit	Description	Stack No.	Control Device No.
EP-09	Hammermill – Charcoal and Coal	S-1	CD-03 Fabric Filter
EP-16	Hammermill – Sawdust		
EP-33	Conveying (4)		
EP-62	Charcoal Silo Loading		
EP-63	Coal Silo Loading		
EP-64	Retort Silo Loading		
EP-65	Mesquite Silo Loading		
EP-71	Mesquite Load Out Vibrator	S-2	CD-06 Fabric Filter
EP-72	Briquet Storage Bin Loading		
EP-73	Load Out Vibrator		
EP-74	Shaker		
EP-75	Conveyor		
EP-76	Conveyor		
EP-78	Scale		
EP-79	Load Out Vibrator		
EP-80	Conveyor		
EP-81	Scale		
EP-66	Lime Silo Pneumatic Loading	S-3	CD-13 Fabric Filter
EP-67	Starch Silo Pneumatic Loading	S-4	CD-12 Fabric Filter

Operational Limitation:

The permittee shall control particulate emissions from the emission units using baghouses. The baghouses shall be operated and maintained in accordance with the manufacturer’s specifications. Each baghouse shall be equipped with a gauge or meter which indicates the pressure drop across the control device. These gauges or meters shall be located such that they may be easily observed by the Department of Natural Resources’ (DNR) employees. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across each baghouse at least once each operating day (if the emission unit is not operated that day, the operating pressure drop need not be monitored/recorded). The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. The manufacturer’s specifications shall be retained onsite for verification of the operating pressure drop range.
2. The permittee shall maintain an operating and maintenance log for the baghouses, using Attachment D or an equivalent form generated by the permittee, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
4. All records must be maintained for five (5) years.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following 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

10 CSR 10-6.045 Open Burning Requirements

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

- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(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 10-6.110 Submission of Emission Data, Emission Fees and Process Information

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

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

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

10 CSR 10-6.150 Circumvention

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

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

Emission Limitation:

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

Monitoring:

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 A, 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 the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

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

V. General Permit Requirements

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

10 CSR 10-6.065, §(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 Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) 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. 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's 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This 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 Mr. Chris Jackson, Plant Manager. On August 30, 2010, the Air Pollution Control Program was informed that Mr. Paul McAllister, Area Vice President, is now the responsible official. 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 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 C

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

Readings ranged from _____ to _____ % opacity.

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

ATTACHMENT E
 10 CSR 10-3.060 Compliance Demonstration

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

Emission Unit	Description	MHDR (MMBtu/hr)
EP-53	Natural Gas Space Heating (7 units)	4.01
EP-54	Natural Gas Starch Boiler	2.25
EP-83	Natural Gas Wax Boiler	4.50
Total Q		10.76

The allowable PM emission limitation for new indirect heating sources at an installation having an intermediate capacity rating between ten (10) million and two thousand (2,000) million Btu shall be determined by use of the following equation:

$$E = 1.31(Q)^{-0.338} = 1.31(10.76)^{-0.338} = 0.59$$

Emission Unit	Fuel	Emission Factor	Uncontrolled Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)	Is the Emission Unit in compliance?
EP-53	Natural Gas	7.6 lb/MMscf	0.007	0.59	YES
EP-54	Natural Gas	7.6 lb/MMscf	0.007	0.59	YES
EP-83	Natural Gas	7.6 lb/MMscf	0.007	0.59	YES

The natural gas emission factor was taken from FIRE. All of the indirect heating sources meet the emission limits without the aid of a control device while burning natural gas, therefore CAM is not applicable.

ATTACHMENT G1
 Plantwide PM₁₀ Compliance Worksheet

PM₁₀ Emission Rate (tons/month) = Monthly Usage * PM₁₀ Emission Factor * 0.0005 tons/lb

Emission Unit No.	Description	Monthly Usage (tons)	PM ₁₀ Emission Factor (lb/ton)	Control Efficiency ¹	PM ₁₀ Emission Rate (tons/month)
EP-01	Coal Storage		0.0074	0.0375	
EP-02 and EP-04	Sawdust and Charcoal Storage Piles		0.0591	0.0375	
EP-03	Mesquite Storage Pile		0.0591	0.1875	
EP-05	Lime Storage Pile		0.0385	0.01875	
EP-06 and EP-13	Hoppers		0.36	0.0375	
EP-07, EP-08, and EP-26	Hoppers and Conveying		0.18	0.0375	
EP-09	Hammermill – Charcoal and Coal		0.26	0.90	
EP-16	Hammermill - Sawdust		0.2	0.90	
EP-25	Sodium Nitrate Mixer		0.02	0.0375	
EP-27	Paddle Mixer		0.02	0.50	
EP-28	Conveying – Mixture (3)		0.18	0.50	
EP-29	Press		0.62	0.50	
EP-31A	Briquet Dryer/Cooler – Process Emissions		0.143	-	
EP-32	Fines Screening & Conveying		0.1	0.0375	
EP-33, EP-71, EP-72, EP-73, EP-74, EP-75, EP-76, EP-78, EP-79, EP-80, and EP-81	Conveying and Handling		0.1	0.90	
EP-38	Dip Tank Loadout		0.1	0.50	
EP-39	Bagging Briquettes (2)		0.06	0.0375	
EP-56 and EP-60	Hoppers		0.36	0.01875	
EP-57, EP-59, and EP-61	Screw Conveyors		0.36	-	
EP-58	Sawdust Hammermill		0.2	0.01875	
EP-62, EP-63, and EP-64	Silo Loading		0.14	0.90	
EP-65	Mesquite Silo Loading		0.36	0.90	
EP-66 and EP-67	Pneumatic Loading		0.00034	0.90	
EP-68	Shaker		0.08	0.50	
EP-69 and EP-77	Conveying		0.1	0.50	
EP-70	Fines Storage Pile		0.0267	-	
EP-82	Sawdust Storage Pile		0.0595	0.01875	
		(MMBtu)	(lb/MMBtu)		(tons/month)
EP-31B	Briquette Dryer/Cooler – Combustion Emissions		0.377	-	
		(MMscf)	(lb/MMscf)		(tons/month)
EP-53, EP-54, and EP-83	Natural Gas Combustion		7.6		
Monthly PM₁₀ Emissions:					

¹Control Device Efficiencies at the installation include 1.875% for partial enclosures, 3.75% for enclosures, 50% for documented moisture content, and 90% for baghouses

ATTACHMENT H
 10 CSR 10-6.260 Compliance Demonstration

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

Allowable SO_x emission limitation for new sources is 500 ppmv.

Emission Unit	Fuel	Emission Factor (lb/MMBtu)	Conversion Factors			Emission Rate (lb/MMBtu)	Emission Limit (ppmv)
			(MMBtu/wscf)	(ppmw·scf/lb)	(ppmv/ppmw)		
EP-31B	Sawdust	0.025	0.00010823	6024100	0.45	7.304	500

The SO₂ emission factor was taken from AP-42. The SO₂ emission factor assumes 100% conversion of sulfur oxides to SO₂; therefore, there are no SO₃/H₂SO₄ emission factors available and the emission unit is assumed to be in compliance with the 35 mg/m³ SO₃/H₂SO₄ standard. The emission unit meets the emission limitation without the use of a control device; therefore, CAM is not applicable.

ATTACHMENT I
 10 CSR 10-6.400 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*.

Allowable PM Emission Rate (E) for Process Weights (P) of less than or equal to 30 tons/hr is calculated by:

$$E \text{ (lb/hr)} = 4.1(P)^{0.67}$$

Allowable PM Emission Rate (E) for Process Weights (P) greater than 30 tons/hr is calculated by:

$$E \text{ (lb/hr)} = 55(P)^{0.11} - 40$$

Potential PM Emission Rate = MHDR (tons/hr) x Emission Factor (lb/ton)

Emission Unit	Description	MHDR (tons/hr)	Emission Factor (lb/ton)	Potential PM Emission Rate (lb/h)	PM Emission Limit (lb/h)
EP-04	Charcoal Storage	10	0.0591	0.591	19.18
EP-06	Load Hopper - Charcoal And Coal	14.5	0.36	5.22	24.60
EP-07	Hopper Loadout - Charcoal And Coal	14.5	0.18	2.61	24.60
EP-08	Conveying - Charcoal And Coal	14.5	0.18	2.61	24.60
EP-09	Hammermill - Charcoal And Coal	14.5	0.26	3.77	24.60
EP-13	Load Hopper - Sawdust	5	0.36	1.80	12.05
EP-16	Hammermill -Sawdust	5	0.2	1.00	12.05
EP-28	Conveying-Mixture (3)	24	0.18	4.32	34.48
EP-29	Press	12	0.62	7.44	21.67
EP-31A	Briquette Dryer/Cooler - Process	12	0.143	1.72	21.67
EP-33	Conveying (4)	48	0.1	4.80	44.20
EP-39	Bagging Briquettes (2)	23	0.06	1.38	33.51
EP-56	Load Sawdust Hopper	1.68	0.36	0.60	5.80
EP-60	Hopper Loadout	1.68	0.36	0.60	5.80
EP-62	Charcoal Silo Loading	14.5	0.14	2.03	24.60
EP-63	Coal Silo Loading	14.5	0.14	2.03	24.60
EP-64	Retort Silo Loading	5	0.14	0.70	12.05
EP-69	Conveying	36	0.1	3.60	41.58
EP-72	Briquet Storage Bin Loading	12	0.1	1.20	21.67
EP-73	Load Out Vibrator	13	0.1	1.30	22.86
EP-74	Shaker	13	0.1	1.30	22.86
EP-75	Conveyor	13	0.1	1.30	22.86
EP-76	Conveyor	7.7	0.1	0.77	16.10
EP-78	Scale	13	0.1	1.30	22.86
EP-79	Load Out Vibrator	10	0.1	1.00	19.18
EP-80	Conveyor	10	0.1	1.00	19.18
EP-81	Scale	10	0.1	1.00	19.18

PM Emission Factors were taken from AP-42, FIRE, Stack Testing, and EIQ Form 2.8 Storage Pile Worksheet. Every emission unit is significantly below the PM rate emission limit without the use of a control device; therefore, CAM is not applicable. These emission units are in compliance with this regulation while they are properly maintained and operated.

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received April 27, 2007
- 2) 2008 Emissions Inventory Questionnaire
- 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 0184-018, Issued November 23, 1983
- 5) Construction Permit 082001-010, Issued July 19, 2001
- 6) Construction Permit 022002-008, Issued February 14, 2002
- 7) Construction Permit 062002-006, Issued June 11, 2002

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined 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* is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

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

Construction Permit 0184-018, Issued November 23, 1983:

- This construction permit is for the initial installation of the charcoal briquet plant.
- This construction permit contains no special conditions.

Construction Permit 082001-010, Issued July 19, 2001:

- This construction permit is for the replacement of the 18.6 MMBtu/hr natural gas burners with (4) 5 MMBtu/hr Webb sawdust burners (EP-31) and the installation of (4) 12 tons/hr pneumatic transfer units and 200-ton capacity storage silo (EP-55) to feed the new sawdust burners.
- Due to the combustion rate of the burners EP-55 is bottlenecked to 1.25 tons/hr.
- This construction permit contains no special conditions.

Construction Permit 022002-008, Issued February 14, 2002:

- This construction permit is for the installation of EP-56 10 tons/hr hopper, EP-57 10 tons/hr screw conveyor, EP-58 10 tons/hr lump breaker, EP-59 1.25 tons/hr screw conveyor, EP-60 1.25 tons/hr hopper, and EP-61 1.25 tons/hr screw conveyors (4).
- Special Condition 1 limits the emissions from EP-55, EP-56, EP-57, EP-58, EP-59, EP-60, and EP-61 to 15 tons/yr; however, the installation built EP-82 rather than EP-55, so the limit was applied to EP-56, EP-57, EP-58, EP-59, EP-60, EP-61, and EP-82.

Construction Permit 062002-006, Issued June 11, 2002:

- This construction permit is for the installation of an additional 5 MMBtu/hr burner to EP-31. EP-31 now has (5) 5 MMBtu/hr for an overall MHDR of 25 MMBtu/hr. The additional burner increases the MHDRs of EP-55, EP-59, EP-60, and EP-61 to 1.5625 tons/hr.
- This construction permit contains no special conditions. Since Construction Permit 022002-008 was not superceded the 15 ton/yr limit on EP-56, EP-57, EP-58, EP-59, EP-60, EP-61, and EP-82 is still applicable despite the increased capacity of EP-55, EP-59, EP-60, and EP-61.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is not applicable to the installation.

- The regulation is not applicable to EP-31 Briquet Dryer/Cooler as this emission unit is a direct heating source.
- The regulation is not applicable to EP-53 Space Heating, EP-54 Starch Boiler, or EP-83 Wax Boiler as they each have a capacity below 10 MMBtu/hr. .

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984* is not applicable to the installation. EP-51 Mineral Spirits Storage Tanks do exceed the 75 m³ (19,813 gallons), but as they have a maximum true vapor pressure below 15.0 kPa, the tanks are exempt from the regulation [§60.110b(b)]. EP-52 Diesel Fuel Tank is below the 75 m³ capacity threshold of §60.110b(a).

Maximum Achievable Control Technology (MACT) Applicability

The installation is an area source for Hazardous Air Pollutants. There are no area source MACTs currently promulgated which are applicable to this installation.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Other Regulatory Determinations

The following emission units were not included within the operating permit for the stated reasons:

Emission Unit	Description	Reason
EP-10	Drag Conveyor	Dismantled
EP-11	Conveying Raw Material	Reported and permitted under EP-62 Charcoal Silo Loading and EP-63 Coal Silo Loading
EP-12	Bucket Elevator	
EP-14	Hopper Loadouts – Sawdust	Reported and permitted under EP-64 Retort Silo Loading and EP-65 Mesquite Silo Loading
EP-15	Conveying - Sawdust	
EP-17	Bucket Elevator – Sawdust	
EP-18	Bins Conveyor	Removed from installation
EP-21	Line Mixing – Raw Materials	
EP-22	Conveying (4)	
EP-23	Bucket Elevator (2)	
EP-24	Mixture Bins	
EP-30	Tote Bin & Fines Pick Up Points (2)	
EP-34	Bucket Elevator	Reported and permitted under EP-72 Briquet Storage Bin Loading, EP-73 Load Out Vibrator, EP-74 Shaker, EP-75 Conveyor, EP-76 Conveyor, EP-77 Conveyor, EP-78 Scale, EP-79 Load Out Vibrator, EP-80 Conveyor, and EP-81 Scale
EP-35	Bin Loadouts (4)	
EP-36	Conveying (6)	
EP-55	Sawdust Silo Loadout	The silo was never built, instead the installation constructed EP-82 Sawdust Storage Pile

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* is applicable to this installation and has been applied within this permit. The regulation is applicable to the following emission units but was not applied within this operating permit as the emission units have the potential to emit less than 0.5 lbs/hr and are assumed to always be in compliance with this regulation:

Emission Unit	Description
EP-01	Coal Storage
EP-02	Sawdust Storage
EP-03	Mesquite Storage
EP-05	Lime Storage
EP-25	Sodium Nitrate Mixer
EP-26	Borax Hopper
EP-27	Paddle Mixer
EP-32	Fines Screening & Conveying
EP-38	Dip Tank Loadout

Emission Unit	Description
EP-53	Natural Gas Space Heating (7 units)
EP-54	Natural Gas Starch Boiler
EP-58	Sawdust Hammermill
EP-68	Shaker
EP-70	Fines Storage Pile
EP-77	Conveyor
EP-82	Sawdust Storage Pile
EP-83	Natural Gas Wax Boiler

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* is applicable to this installation and has been applied within this permit. The regulation is not applicable to the following sulfur emission units per 10 CSR 10-6.260(1)(A)2 as they exclusively combust natural gas:

Emission Unit	Description
EP-53	Natural Gas Space Heating (7 units)
EP-54	Natural Gas Starch Boiler
EP-83	Natural Gas Wax Boiler

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes* is applicable to this installation and has been applied within this permit. The regulation is not applicable to the following particulate matter emission sources per 10 CSR 10-6.400(1)(B)12 as they emit less than 0.5 lbs/hr:

Emission Unit	Description
EP-01	Coal Storage
EP-02	Sawdust Storage
EP-03	Mesquite Storage
EP-05	Lime Storage
EP-25	Sodium Nitrate Mixer
EP-26	Borax Hopper
EP-27	Paddle Mixer
EP-32	Fines Screening & Conveying
EP-38	Dip Tank Loadout

Emission Unit	Description
EP-53	Natural Gas Space Heating (7 units)
EP-54	Natural Gas Starch Boiler
EP-58	Sawdust Hammermill
EP-68	Shaker
EP-70	Fines Storage Pile
EP-77	Conveyor
EP-82	Sawdust Storage Pile
EP-83	Natural Gas Wax Boiler

The regulation is not applicable to the following particulate matter emissions sources per 10 CSR 10-6.400(1)(B)7 as they are fugitive emission sources:

Emission Unit	Description
EP-57	Screw Conveyor
EP-59	Screw Conveyor
EP-61	(5) Screw Conveyors

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

Pollutant	Potential to Emit (tons/yr) ¹
CO	69.47
CO _{2e}	28,518.81
NH ₃	0.02
NO _x	58.14
PM ₁₀	178.67 ²
PM ₂₅	27.72
SO _x	2.76
VOC	15.46
Combined HAPs ³	4.18

¹This potential to emit is based upon 8,760 hours of uncontrolled annual operation unless otherwise noted. EP-03, EP-05, EP-56, EP-58, EP-60, and EP-82 were given a 1.875% inherent PM₁₀ control efficiency for partial enclosure. EP-01, EP-02, EP-04, EP-06 – EP-08, EP-13, EP-25, EP-26, EP-32, and EP-39 were given a 3.75% inherent PM₁₀ control efficiency for enclosure. EP-27 – EP-29, EP-38, EP-68, EP-69, and EP-77 were given a 50% inherent PM₁₀ control efficiency for documented moisture content. EP-09, EP-16, EP-33, EP-62 – EP-67, EP-71 – EP-76, and EP-78 – EP-81 were given a 90% PM₁₀ control efficiency based upon the voluntary condition to maintain baghouses within Permit Condition 006. EP-56, EP-57, EP-58, EP-59, EP-60, EP-61, and EP-82 were evaluated at a combined potential to emit of 15 tons/yr per Special Condition 1 of Construction Permit 022002-008.

²The installation accepted a voluntary condition to emit less than 100 tons/yr of PM₁₀ in order to obtain this intermediate operating permit.

³The primary source of HAP emissions for the installation is EP-31.

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 schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
 Environmental Engineer

CERTIFIED MAIL: 70073020000315695837
RETURN RECEIPT REQUESTED

Mr. Paul McAllister
Area Vice President
Royal Oak Enterprises, LLC - West Plains Briquet Plant
P.O. Box 850
West Plains, MO 65775

Re: Royal Oak Enterprises, LLC - West Plains Briquet Plant, 091-0037
Permit Number: **OP2011-008**

Dear Mr. McAllister:

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/ark

Enclosures

c: Southeast Regional Office
PAMS File: 2007-05-010