

Missouri Department of Natural Resources
Air Pollution Control Program

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: OP2010-097
Expiration Date: AUG 22 2015
Installation ID: 077-0021
Project Number: 2005-02-098

Installation Name and Address

Solo Cup Co. Inc.
1100 N. Glenstone
Springfield, MO 65801
Greene County

Parent Company's Name and Address

Solo Cup Company
1700 Old Deerfield Road
Highland Park, IL 60035

Installation Description:

Solo Cup Co. Inc. is a facility that makes drinking cups and rolls of printed food containers for the fast food and beverage industries. Processes include flexographic printing, ink dryers and natural gas and distillate oil fired boilers.

AUG 23 2010

Effective Date

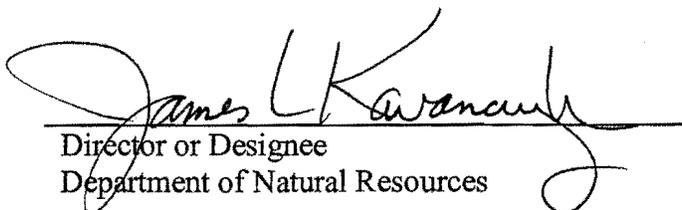

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	4
INSTALLATION DESCRIPTION	4
EMISSION UNITS WITH LIMITATIONS	4
EMISSION UNITS WITHOUT LIMITATIONS.....	4
DOCUMENTS INCORPORATED BY REFERENCE.....	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
PERMIT CONDITION PW001	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	5
PERMIT CONDITION PW002	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	5
PERMIT CONDITION PW003	6
10 CSR 10-6.060 Construction Permits Required.....	6
Construction Permit 0999-206D, Issued September 20, 1999	6
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	8
EU-03 BOILER #3	8
PERMIT CONDITION (EU-03)-001.....	8
10 CSR 10-6.070 New Source Performance Regulations	8
40 CFR Part 60 Subpart A General Provisions and Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.....	8
10 CSR 10-6.060 Construction Permits Required.....	8
Construction Permit 0999-206D, Issued September 20, 1999	8
PERMIT CONDITION (EU-03)-002.....	9
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.6.065(5)(A) Voluntary Limitation(s)	9
10 CSR 10-6.060 Construction Permits Required.....	9
Construction Permit 0999-206D, Issued September 20, 1999	9
EU-04 AND EU-05 BOILER #1 AND BOILER #2	10
PERMIT CONDITION (EU-04 and EU-05)-001	10
10 CSR 10-4.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used For Indirect Heating	10
Code of Ordinances of Springfield, Part II, Chapter 6 Article III, Division 3 (Sections 6.231 through 6.237) Particulate Matter From Fuel Burning Equipment	10
PERMIT CONDITION (EU-04 and EU-05)-002	11
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	11
Code of Ordinances of Springfield, Part II, Chapter 6 Article III, Division 2 (Sections 6.211 through 6.213) Visible Air Contaminants From Equipment	11
PERMIT CONDITION (EU-04 and EU-05)-003	12
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	12
PERMIT CONDITION (EU-04 and EU-05)-004	13
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.6.065(5)(A) Voluntary Limitation(s)	13
IV. CORE PERMIT REQUIREMENTS	15
V. GENERAL PERMIT REQUIREMENTS.....	22
VI. ATTACHMENTS	26
ATTACHMENT A	27
VOC Log	27
ATTACHMENT B	28
Plantwide Individual HAP Log.....	28
ATTACHMENT C	29
Plantwide Combined HAP Log	29

ATTACHMENT D.....30
NOTE: EMISSION UNIT EU-03 BOILER #1 IS NOT SUBJECT TO 10 CSR 10-4.040 BECAUSE IT IS SUBJECT TO
40 CFR PART 60 SUBPART DCATTACHMENT E130
ATTACHMENT E1.....31
ATTACHMENT E2.....32
ATTACHMENT F.....33
ATTACHMENT G34
ATTACHMENT H35
ATTACHMENT I.....36
ATTACHMENT J.....37

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Solo Cup Co. Inc. is a flexographic printing facility that makes drinking cups and rolls of printed food containers for the fast food and beverage industries. Several large and small flexographic printing machines print multicolored inks onto rolls of paper and polystyrene. The larger printing machines have natural gas fired dryers that dry the ink on the printed material. The low solvent ink is water based. The inks used are mixed in a computerized mixing room to reduce the solvent emissions as well. The power house has three large boilers that are natural gas fired with Nos. 2 and 6 fuel oils as standby fuel. The facility also has several small natural gas fired space heaters and a few small hot water heaters. The facility CFC containing HVAC systems are maintained by trained technicians.

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)
2008	0.19	0.02	3.11	3.38	2.11	0	0
2007	0.28	0.02	4.23	3.14	3.11	0	0
2006	0.28	0.02	4.23	3.98	3.11	0	0
2005	0.29	0.03	4.31	3.41	3.24	0	0.03
2004	0.28	0.02	4.11	4.16	3.00	0	0

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU-03	Boiler #3, Superior 14390
EU-04	Boiler #1, Wicks 61718-1
EU-05	Boiler #2, Wicks 61718-2

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.

Description of Emission Source

Flexographic Printing Presses – Natural Gas Dryer
 No. 2 Fuel Oil Storage Tank

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

Construction Permit 0999-206D, Issued September 20, 1999

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 Volatile Organic Compounds (VOCs) from the installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of monthly usage for each VOC emitting material.
2. The monthly emissions of volatile organic compounds from each VOC emitting material shall be calculated, Attachment A *or an equivalent form generated by the permittee* may be used.
3. The permittee shall calculate their annual emission of volatile organic compounds by summing the monthly emissions from each VOC emitting material 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. All records shall be kept for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation.

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, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the 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 PW002

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

Emission Limitation:

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

Monitoring/Record Keeping:

1. The permittee shall record the amount of each HAP emitting material used each month.
2. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAPs using Attachments B & C or equivalent forms generated by the permittee.
3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all material used at the installation.
4. All records shall be kept 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 10 tons individual or 25 tons combined should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the 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 PW003

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0999-206D, Issued September 20, 1999

Emission Limitation:

1. The permittee shall emit less than 100 tons of SO_x from all aggregate boiler in operation at the installation in any consecutive 12-month period. [Special Condition No. 3]
2. The permittee shall emit less than 100 tons of NO_x from all aggregate boilers in operation at the installation in any consecutive 12-month period. [Special Condition No. 3]

Monitoring/Recordkeeping:

1. The permittee shall calculate their annual emission of NO_x and SO_x by summing the monthly emissions from NO_x and SO_x emitted by the boilers for the last twelve months. The 12-month running emissions total will be calculated each month using the most recent twelve months worth of monthly emission totals. Attachments I and J or equivalent forms generated by the permittee shall be used for this purpose.
2. All records shall be kept for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation. [Special Condition No. 5]

Reporting:

1. If at any time the yearly emission limit of 100 tons of NO_x or SO_x 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, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten (10) days after the exceedance.

2. The permittee shall report any deviations from the 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.

EU-03 Boiler #3			
Emission Unit	Description	Manufacturer/Model #	2009 EIQ Reference #
EU-03	Boiler #3, 30 MMBtu/hr, Natural Gas and No. 2, Constructed in 1999	Superior/14309	EP03

PERMIT CONDITION (EU-03)-001
 10 CSR 10-6.070 New Source Performance Regulations
 40 CFR Part 60 Subpart A General Provisions and Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 0999-206D, Issued September 20, 1999

Emission Limitation:

1. The permittee shall combust only pipeline grade natural gas or distillate oil that contains less than 0.5 weight percent sulfur in Boiler #3 (EU-03). The fuel oil supplier shall provide the Source laboratory analysis results of the sulfur content in the fuel oil used in Boiler No. 3 (EU-03). [Special Condition No. 1 of Construction Permit 0999-206D]
2. The permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity from Boiler #3 (EU-03).

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit 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 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 (2) weeks for a period of eight 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 weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see E1 or E2), 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. (see Attachment F)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment G)
4. Attachments E1 or E2, F and G contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. The permittee shall maintain records of distillate oil fuel supplier certification containing the following information:
 - a) The name of the distillate oil supplier;
 - b) A statement from the distillate oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and
 - c) The maximum sulfur of the distillate fuel.
6. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
7. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION (EU-03)-002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.6.065(5)(A) Voluntary Limitation(s)

10 CSR 10-6.060 Construction Permits Required

Construction Permit 0999-206D, Issued September 20, 1999

Emission Limitation:

The total amount of No. 2 fuel oil burned by this Boiler #3 (EU-03) shall not exceed 1,560,000 gallons per rolling 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall record the monthly and running 12-month totals of natural gas and No. 2 fuel oil burned by Boiler #3 (EP-03). Attachment H or an equivalent record keeping sheet shall be used to record fuel usage. [Special Condition No. 2 of Construction Permit 0999-206D]
2. All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request and shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten (10) days after the end of each month in which records indicate that the facility exceeded the limitations described above.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification, as required by Section IV of this permit.

EU-04 and EU-05 Boiler #1 and Boiler #2			
Emission Unit	Description	Manufacturer/Model #	2009 EIQ Reference #
EU-04	Boiler #1, 27.5 MMBtu/hr, Natural Gas and No. 2 Fuel Oil, Constructed in 1951	Wicks	EP04
EP-05	Boiler #2, 30 MMBtu/hr, Natural Gas and No. 2 Fuel Oil, Constructed 1951	Wicks	EP05

PERMIT CONDITION (EU-04 and EU-05)-001

10 CSR 10-4.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used For Indirect Heating
Code of Ordinances of Springfield, Part II, Chapter 6 Article III, Division 3 (Sections 6.231 through 6.237) Particulate Matter From Fuel Burning Equipment

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.41 pounds per million BTU of heat input.

Operational Limitation/Equipment Specifications:

This emission unit shall be limited to burning pipeline grade natural gas and No. 2 fuel oil.

Monitoring/Record Keeping:

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment D).
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations from the 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 (EU-04 and EU-05)-002

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants
Code of Ordinances of Springfield, Part II, Chapter 6 Article III, Division 2 (Sections 6.211 through 6.213) Visible Air Contaminants From Equipment

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source 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 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit 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 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 (2) weeks for a period of eight 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 weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see E1 or E2), 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. (see Attachment F)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment G)

4. Attachments E1 or E2, F and G contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION (EU-04 and EU-05)-003
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitation:

1. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.
3. 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)	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m ³))	Annual arithmetic mean
	0.14 ppm (365 µg/m ³)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
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

Operational Limitation/Equipment Specifications:

The emission unit shall be limited to burning natural gas or No. 2 fuel oil with a sulfur content of no more than 0.5% sulfur by weight.

Monitoring:

1. The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. If the requirements of condition 1 cannot be met, then compliance to the emission limitations shall be determined by source testing. The heating value of the fuel shall be determined as specified in 10 CSR 10-6.040(2). Source testing to determine compliance shall be performed as specified in 10 CSR 10-6.030(6). The actual heat input shall be determined by multiplying the heating value of the fuel by the amount of fuel burned during the source test period.
3. Other methods approved by the permitting agency in advance may be used to verify compliance.

Recordkeeping:

1. If monitoring option 1 is used to verify compliance, then the permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. If monitoring option 2 is used to verify compliance, then the permittee shall maintain records on the premises of all source testing performed.
3. All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request and shall be maintained for five years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten (10) days after the end of each month in which records indicate that the facility exceeded the limitations described above.

PERMIT CONDITION (EU-04 and EU-05)-004

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The total amount of No. 2 fuel oil burned by each of Boiler #1 (EU-04) and Boiler #2 (EP-05) shall not exceed 1,560,000 gallons per rolling 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall record the monthly and running 12-month totals of No. 2 fuel oil burned by Boiler #1 (EU-04) and Boiler #2 (EP-05). Attachment H or an equivalent record keeping sheet shall be used to record fuel usage.
2. All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request and shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten (10) days after the end of each month in which records indicate that the facility exceeded the limitations described above.
2. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification, as required by Section IV 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 a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (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) Solo Cup Co. Inc. 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 Solo Cup Co. Inc. 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.

Springfield City Code Article XVI Breakdown of Equipment

This requirement is not federally or state enforceable.

In the event that emissions as a direct result of upset conditions or breakdown exceed any of the established limits, the permittee shall advise the city of Springfield Director of Health of such a breakdown and outline a corrective program acceptable to the Director.

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.

Springfield City Code Article III 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 10-6.110 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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 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.

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 10-4.070 Restriction on 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.

Springfield City Code Article X Control of Odors in the Ambient Air

This requirement is not federally enforceable.

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

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

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

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

ATTACHMENT D

This attachment may be used to demonstrate compliance with 10 CSR 10-4.040 *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

Emission Limit for EU-04 and EU05 (existing, i.e. installed by 02/15/1979):

$$0.90 Q^{-0.174} = 0.90(87.5)^{-0.174} = 0.41 \text{ lb/mmBtu}$$

where Q is the total heat input of all indirect heating sources at the installation.

The following equipment was used to obtain the total heat input (Q) for the above equation:

Equipment	Heat Input (mmBtu/hr)
Boiler #3 (EU-03)	30.0
Boiler #1 (EU-04)	27.5
Boiler #2 (EU-05)	30.0
TOTAL	87.5

The natural gas dryers at the installation are considered direct heating sources, and therefore were not included in the calculation of total heat input.

The following table demonstrates compliance with the emission limit:

$$\text{Emission Rate (lb/mmBtu)} = \text{MHDR} * \text{Emission Factor} / \text{Heat Capacity (mmBtu/hr)}$$

Emission Unit #	Heat Capacity	Maximum Hourly Design Rate ¹	PM Emission Factor	Emission Factor Reference	Potential Emission Rate	Emission Rate Limit
EP-04 (nat. gas)	27.5 (mmBtu/hr)	0.026 mmft ³ /hr	7.6 lb/mmft ³	AP-42 Table 1.4-2	0.0073 (lb/mmBtu)	0.41 (lb/mmBtu)
EU-04 (fuel oil)	27.5 (mmBtu/hr)	0.196 Mgal/hr	1.0 lb/Mgal	AP42 Table 1.3-1	0.0071 (lb/mmBtu)	0.41 (lb/mmBtu)
EP-05 (nat. gas)	30.0 (mmBtu/hr)	0.0269 mmft ³ /hr	7.6 lb/mmft ³	AP-42 Table 1.4-2	0.0073 (lb/mmBtu)	0.41 (lb/mmBtu)
EU-05 (fuel oil)	30.0 (mmBtu/hr)	0.214 Mgal/hr	1.0 lb/Mgal	AP42 Table 1.3-1	0.0071 (lb/mmBtu)	0.41 (lb/mmBtu)

Note: Emission Unit EU-03 Boiler #1 is not subject to 10 CSR 10-4.040 because it is subject to 40 CFR Part 60 Subpart Dc

¹ Heat capacity divided by heating value of fuel; 1050 mmBtu/mmft³ for natural gas, 140 mmBtu/1000gal for fuel oil (AP-42, Appendix A)

Attachment E1

Method 22 (Outdoor Observation Log)		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.		
Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		

Attachment G

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

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

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

Readings ranged from _____ to _____ % opacity.

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

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received February 23, 2005;
- 2) 2009 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.

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

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*

This rule 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:

Several construction permits have been issued by the Springfield Air Quality Control Agency for a variety of printing presses at the installation. Many of these permits contain VOC emission caps in excess of 100 tpy. Since the installation is now taking a voluntary plant-wide VOC emission limit of 100 tpy as part of this Intermediate Operating Permit, these conditions have not been listed in this permit.

Permit 0999-206D was issued for Boiler #3 and contains special conditions that have been incorporated into this permit along with the requirements of NSPS Subpart Db and voluntary permit conditions proposed by the permittee.

New Source Performance Standards (NSPS) Applicability

The following boilers are not subject to 10 CSR 10-6.060 and 40 CFR Part 60, Subpart Dc because the units were installed before June 9, 1989

EU#	Description	Year Installed
EU-04	Boiler #1, Wicks 61718-1	1951
EU-05	Boiler #2, Wicks 61718-2	1951

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*

The No. 2 fuel oil storage tank (EP-06) is not subject to Subpart Kb per §60.110b(b). The maximum true vapor pressure of No. 2 fuel oil was calculated using Table 7.1-2 of AP-42 and NOAA temperature data as 0.11kPa.

Maximum Available Control Technology (MACT) Applicability

None.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to Air Pollution Control Program 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.

Other Regulatory Determinations

10 CSR 10-4.404, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

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

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

These regulations are not applicable to emission unit EU-03 Boiler #3 because this unit is subject to 10 CSR 6.070 and 40 CFR Part 60, Subpart Dc. Subpart Dc contains emissions standards for particulate matter, opacity and sulfur emissions. Springfield local ordinance Part II, Chapter 6 Article III, Division 2 (Section 6.211 through 6.213), Visible Air Contaminants from Equipment does not contain an exemption for these units, however it was not applied as the opacity requirements of Subpart Dc are more stringent and will assure compliance with the local ordinance.

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

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

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

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

Prepared by:

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