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# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

NOV 07 2018

Mr. Daniel K. Hollingshead  
TAMKO Building Products, Inc.  
3001 Newman Road  
Joplin, MO 64801

Re: TAMKO Building Products, Inc., 097-0094  
Permit Number: OP2018-091

Dear Mr. Hollingshead:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

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

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:nwj

Enclosures

c: PAMS File: 2013-07-067



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**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2018-091  
**Expiration Date:** NOV 07 2023  
**Installation ID:** 097-0094  
**Project Number:** 2013-07-067

**Installation Name and Address**

TAMKO Building Products, Inc.  
3001 Newman Road  
Joplin, MO 64801  
Jasper County

**Parent Company's Name and Address**

TAMKO Building Products  
P.O. Box 1404  
Joplin MO, 64802

**Installation Description:**

TAMKO Building Products, Inc. manufactures roofing products and includes such processes and products as glass mat, asphalt coatings and saturants. The operations at the installation are divided into two main manufacturing operations: Refinery Operations and Fiberglass Mat Manufacturing Operations. The installation is subject to the following federal regulations, 40 CFR part 60 Subparts Dc, IIII, and UU; 40 CFR part 63 Subparts CCCCCC and AAAAAAAA. The installation has potential emissions greater than the major source thresholds for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, VOC, and CO. The installation is an area source of HAPs.

Director or Designee  
Department of Natural Resources

NOV 07 2018

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations. These emission units are subject to permit conditions found in Sections II and/or III of this permit.

<b>Emission Point #</b>	<b>Unit Description</b>
<b>Boiler Operations</b>	
EP-07	Boiler #7
EP-08	Boiler #8
<b>Refinery Operations</b>	
	500 gallon gasoline storage tank
	Emergency Generators
EP BS-AB1-A	Asphalt Blow Still #37
EP BS-AB1-B	Asphalt Blow Still #36
EP BS-AB2-A	Asphalt Blow Still #35
EP BS-AB2-B	Asphalt Blow Still #34
EP DFTO-101	Thermal Oxidizer Heater (Large)
EP DFTO-102	Zink 25 MMBtu/hr DFTO
EP 3-08	Asphalt Storage Tank #1 Heater
EP 3-08A	Asphalt Storage Tank #1
EP 3-09	Asphalt Storage Tank #2 Heater
EP 3-09A	Asphalt Storage Tank #2
EP 3-30	Asphalt Storage Tank #3 Heater
EP 3-30A	Asphalt Storage Tank #3
EP 3-40	Asphalt Storage Tank #4 Heater
EP 3-40A	Asphalt Storage Tank #4
EP 3-05	Asphalt Storage Tank #7 Heater
EP 3-05A	Asphalt Storage Tank #7
EP 3-06	Asphalt Storage Tank #8
EP 3-07	Asphalt Storage Tank #9
<b>Fiberglass Mat Manufacturing Operations</b>	
EP 2-9	Honeycomb Dryer Dump Stack and Dryer/Heater
EP 2-9A	RTO on Honeycomb Dryer
EP 2-9B	Fiberglass Trim Chop System
<b>Felt Mill Operations</b>	
EP 1-2	Felt Mill #1 Sawdust Holding Tank
EP A-2	Felt Mill #2 Sawdust Holding Tank
	Sawdust Unload Station

**EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS**

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. These emission units are subject to permit conditions found in Section II of this permit.

<b>Emission Point #</b>	<b>Unit Description</b>
<b>Refinery Operations</b>	
	Truck Asphalt Load Station
	Railcar Asphalt Unloading
	Truck Asphalt Unloading
	Knockout Oil Accumulation Tanks
	Space Heaters, Natural gas fired
	Hand Torches, Natural gas fired
	1,000 gallon diesel storage tank
	500 gallon diesel storage tank
	300 gallon kerosene storage tank
	10,000 gallon knockout oil tank
<b>Fiberglass Mat Manufacturing Operations</b>	
EP 2-7A	Saturator-Excess Water (Vacuum 1 Blower)
EP 2-7B	Saturator-Binder Application (Vacuum 2 Blower)
EP 2-7C	Saturator-Resin Control Vacuum (Vacuum 3 Blower)
EP 2-6A	Delta Former Vacuum-White Water System
EP 2-6B	Dandy Roll Vacuum
EP 2-10	Whitewater System
	Two Binder Storage Tanks
	Binder Batch Tank
	Binder Holding Tank
	Binder Seal Tank
	Couch Pit
	Fiber Feed Station
	Anti Foam Tote
	North Stock Tank
	South Stock Tank
	Two Viscosity Modifier Tanks
	Machine Chest Tank
	Dispersant Tank
	Whitewater Chest
	Collection Chest
	Laboratory Hoods
	Viscosity Modifier System
	Clarified Water Tank
EP 2-11	Roof and Wall Fans
	Trim Baler
	Winder
	Space Heaters

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Emission Point #	Unit Description
<b>Miscellaneous Operations</b>	
	Haul Roads
	Parts Washers

## II. Plant Wide Emission Limitations

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

### Permit Condition PW 062015-009

10 CSR 10-6.6060, Construction Permits Required  
Construction Permit 062015-009, Issued June 15, 2015

#### **Emission Limitation:**

1. The permittee shall emit less than 10.0 tons of hydrogen chloride (HCl) in any consecutive 12 month period from the entire installation<sup>1</sup>. [Special Condition # 4.A.]

#### **Monitoring/Recordkeeping:**

1. The permittee shall maintain records of the monthly and consecutive 12-month hydrogen chloride emissions from the entire installation.
2. The permittee shall use Attachment Hydrogen Chloride, or equivalent, to demonstrate compliance.
3. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

#### **Reporting:**

1. The permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than thirty days following the end of the month.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

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<sup>1</sup> The emission limitation applies on an installation wide basis to maintain area source status. At the time of permit issuance, the only emission units that have the potential to emit hydrogen chloride are the Blowstills, EP BS-AB1-A and B and BS-AB2-A and B.

### III. Emission Unit Specific Emission Limitations

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

<b>Permit Condition Subpart Dc</b>		
10 CSR 10-6.070, New Source Performance Regulations, 40 CFR part 60 Subpart A, General Provisions, and 40 CFR part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units		
EP #	Description	Control Device
EP-07	Boiler #7, 25.2 MMBtu/hr, natural gas fired, installed 9/12/2011, Mfr: Superior, Model: X6-X-3000, Serial: 16863	N/A
EP-08	Boiler #8, 25.2 MMBtu/hr, natural gas fired, installed 9/12/2011, Mfr: Superior, Model: X6-X-3000, Serial: 16865	N/A

**Reporting/Recordkeeping:**

1. Except as provided in §60.48c(g)(2) and (g)(3), the permittee shall record and maintain records of the amount of natural gas combusted during each operating day. [§60.48c(g)(1)]
2. The permittee may elect to record and maintain records of the amount of natural gas combusted during each calendar month. [§60.48c(g)(2)]
3. The permittee may elect to record and maintain records of the total amount natural gas delivered to the installation during each calendar month. [§60.48c(g)(3)]

<b>Permit Condition Subpart CCCCC</b>		
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart A General Provisions Subpart CCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities		
EP #	Description	Control Device
	500 gallon gasoline storage tank	None

**Applicability:**

1. The permittee with a GDF with a monthly throughput of less than 10,000 gallons of gasoline must comply with the requirements in §63.11116. [§63.11111(b)]
2. The permittee shall, upon request by the Administrator, demonstrate the monthly throughput is less than 10,000 gallons. Recordkeeping to document monthly throughput must begin in January 10, 2008. [§63.11111(e)]
3. If the throughput of the GDF ever exceeds an applicable throughput threshold, the permittee shall remain subject to the requirements for sources above the threshold, even if the throughput later falls below the applicable throughput threshold. [§63.11111(i)]

**Emission Limitations:**

1. The permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11115(a)]
2. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)(1) through (4)]
  - a. Minimize gasoline spills;
  - b. Clean up spills as expeditiously as practicable;
  - c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
  - d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
3. The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of this part, but must have records available within 24 hours of a request by the Administrator to document the gasoline throughput. [§63.11116(b)]
4. The permittee must comply with the requirements of this subpart by the applicable dates specified in §63.11113. [§63.11116(c)]
5. Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with §63.1116(a)(3). [§63.11116(d)]

**Recordkeeping:**

The permittee shall keep records as specified in §63.11125(d)(1) and (2). [§63.11125(d)]

1. Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.11125(d)(1)]
2. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.11125(d)(2)]

<b>Permit Condition Subpart JJJJ</b>		
10 CSR 10-6.070, New Source Performance Standards 40 CFR part 60 Subpart A, General Provisions; and 40 CFR part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines		
EP #	Description	Control Device
	Emergency Generator, 150 kW, Spark ignition engine, combusts natural gas, constructed 2014	None
	Emergency Generator, 150 kW, Spark ignition engine, combusts natural gas, constructed 2016	

**Operational Limitations:**

1. The permittee shall comply with the emission standards in §60.4231(c) by purchasing an engine that is certified to the certification emission standards and other requirements for new non-road engines in 40 CFR part 1048. [§60.4233(c) and §60.4231(c)]
2. The permittee must operate and maintain the engine over the entire life of the engine [§60.4234]
3. The permittee must install a non-resettable hour meter. [§60.4237(b)]

**Compliance Requirements:**

1. The permittee must comply by purchasing an engine certified to the emission standards in §60.4231(c), for the same engine class and maximum engine power. In addition, the permittee must meet one of the requirements specified in §60.4243(a)(1) and (2). [§60.4243(a)]
  - a. If the permittee operates and maintains the certified engine according to the manufacturer's emission-related written instructions, the permittee must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required from the permittee. The permittee must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply. If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the engine will not be considered out of compliance. [§60.4243(a)(1)]
  - b. If the permittee does not operate and maintain the certified engine according to the manufacturer's emission-related written instructions, the permittee shall comply with §60.4243(a)(2).
2. The permittee must operate the emergency stationary ICE according to the requirements in §60.4243(d)(1) through (3). In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4243(d)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements in §60.4243(d)(1) through (3), the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines. [§60.4243(d)]
  - a. There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4243(d)(1)]
  - b. The permittee may operate the emergency stationary ICE for any combination of the purposes specified in §60.4243(d)(2)(i) for a maximum of 100 hours per calendar year. Any operation for

non-emergency situations as allowed by §60.4243(d)(3) counts as part of the 100 hours per calendar year allowed by §60.4243(d)(2). [§60.4243(d)(2)]

- i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4243(d)(2)(i)]
- c. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in §60.4243(d)(2). [§60.4243(d)(3)]
3. The permittee may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the permittee is required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233. [§60.4243(e)]

**General Provisions:**

Table 3 to NSPS JJJ shows which parts of the General Provisions in §§60.1 through 60.19 apply. [§60.4246]

**Notifications, Reports, and Records:**

1. The permittee must keep records of the information in §60.4245(a)(1) through (4). [§60.4245(a)]
  - a. All notifications submitted to comply with this subpart and all documentation supporting any notification. [§60.4245(a)(1)]
  - b. Maintenance conducted on the engine. [§60.4245(a)(2)]
  - c. If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable. [§60.4245(a)(3)]
  - d. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards [§60.4245(a)(4)]
2. The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§60.4245(b)]
3. If you own or operate an emergency stationary SI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §60.4243(d)(2)(ii) and (iii) or that operates for the purposes specified in §60.4243(d)(3)(i), you must submit an annual report according to the requirements in paragraphs (e)(1) through (3) of this section. [§60.4245(e)]
  - a. The report must contain the following information: [§60.4245(e)(1)]
    - i. Company name and address where the engine is located. [§60.4245(e)(1)(i)]

- ii. Date of the report and beginning and ending dates of the reporting period. [§60.4245(e)(1)(ii)]
- iii. Engine site rating and model year. [§60.4245(e)(1)(iii)]
- iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§60.4245(e)(1)(iv)]
- v. Hours spent for operation for the purposes specified in §60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in §60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§60.4245(e)(1)(vii)]
- b. The permittee shall submit annual reports for each calendar year no later than March 31 of the following calendar year. [§60.4245(e)(2)]
- c. The permittee must submit the annual report electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to NSPS JJJJ is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §60.4. The permittee shall submit copies to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov). [§60.4245(e)(3)]

<b>Permit Condition Subpart UU</b>		
10 CSR 10-6.070, New Source Performance Regulations, 40 CFR part 60 Subpart A, General Provisions, and 40 CFR part 60 Subpart UU, Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture		
EP #	Description	Control Device
EP BS-AB1-A	Asphalt Blow Still #37, MHDR= 17.5 ton/hr, Mfr: Nueces Model: B5-15, Installed 1990	EP DFTO-101: Direct Fired Thermal Oxidizer, MHDR= 18 MMBtu/hr, combusts natural gas, Mfr: Zeeco, Installed 2001; And EP DFTO-102: Direct Fired Thermal Oxidizer, MHDR = 25 MMBtu/hr, combusts natural gas, Mfr: John Zink Model:DBY-O, Installed June 2015
EP BS-AB1-B	Asphalt Blow Still #36, MHDR= 17.5 ton/hr, Mfr: General Machinery, Installed 1990	
EP BS-AB2-A	Asphalt Blow Still #35, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 933918, Installed 1993	
EP BS-AB2-B	Asphalt Blow Still #34, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 893918, Installed 1993	
EP 3-08A	Asphalt Storage Tank #1, 23,000 gallon capacity, Mfr: General Steel Model: 876503-1, Installed 1989	
EP 3-09A	Asphalt Storage Tank #2, 23,000 gallon capacity, Mfr: General Steel Model: 876503-2, Installed 1989	
EP 3-30A	Asphalt Storage Tank #3, 39,250 gallon capacity, Mfr: General Steel Model: 002238-1, Installed 2000	
EP 3-40A	Asphalt Storage Tank #4, 39,250 gallon capacity, Mfr: General Steel Model: 002238-2, Installed 2000	
EP 3-05A	Asphalt Storage Tank #7, 189,000 gallon capacity, Mfr: General Steel Model: 831063-1, Installed 1990	
EP 3-06	Asphalt Storage Tank #8, 169,000 gallon capacity, Mfr: General Steel Model: 831063-2, Installed 1989	
EP 3-07	Asphalt Storage Tank #9, 189,000 gallon capacity, Mfr: General Steel Model: 893506, Installed 1990	

**Emission Limitations:**

1. The permittee shall not cause to be discharged into the atmosphere from any blowing still: [§60.472(b)]
  - a. Particulate matter in excess of 0.67 kg/Mg (1.3 lb/ton) of asphalt charged to the still when a catalyst is added to the still; and [§60.472(b)(1)]
  - b. Particulate matter in excess of 0.60 kg/Mg (1.2 lb/ton) of asphalt charged to the still during blowing without a catalyst; and [§60.472(b)(3)]
  - c. Exhaust gases with an opacity greater than 0%. [§60.472(b)(5)]
2. The permittee shall not cause to be discharged into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0%, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. [§60.472(c)]

**Monitoring/Recordkeeping:**

1. The permittee shall continuously monitor and record the temperature in the combustion zone of the afterburner. The monitoring instrument shall have an accuracy of ±10 °C (±18 °F) over its range. [§60.473(b)]

2. The permittee is exempted from the quarterly reports required under §60.7(c). The permittee is required to record and report the operating temperature of the control device during the performance test and, as required by §60.7(d), maintain a file of the temperature monitoring results for at least five years. [§60.473(d) and 10 CSR 10-6.065]
3. To demonstrate compliance with the opacity limitation, the permittee shall comply with the Monitoring and Recordkeeping provisions of Permit Condition 6.220. If opacity greater than the limit is observed prior to the end of the prescribed time period, an exceedance is confirmed and the time period may close.

**Reporting:**

1. For the temperature monitoring, the permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than thirty days after the exceedance or event causing the exceedance.
2. For the opacity monitoring, the permittee shall comply with the Reporting provisions of Permit Condition 6.220.
3. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual compliance certification reports required by Section V of this permit.
4. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

<b>Permit Condition Subpart AAAAAAA</b>		
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations, 40 CFR part 63 Subpart A, General Provisions, and 40 CFR part 63 Subpart AAAAAAA, National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing		
EP #	Description	Control Device
EP BS-AB1-A	Asphalt Blow Still #37, MHDR= 17.5 ton/hr, Mfr: Nueces Model: B5-15, Installed 1990	EP DFTO-101: Direct Fired Thermal Oxidizer, MHDR= 18 MMBtu/hr, combusts natural gas, Mfr: Zeeco, Installed 2001; and
EP BS-AB1-B	Asphalt Blow Still #36, MHDR= 17.5 ton/hr, Mfr: General Machinery, Installed 1990	
EP BS-AB2-A	Asphalt Blow Still #35, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 933918, Installed 1993	EP DFTO-102: Direct Fired Thermal Oxidizer, MHDR = 25 MMBtu/hr, combusts natural gas, Mfr: John Zink Model:DBY-O, Installed June 2015
EP BS-AB2-B	Asphalt Blow Still #34, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 893918, Installed 1993	

**Emission Limitations:**

- The permittee shall meet the following emission limitations at all times: [§63.11561(a) and (c), and Table 1 of Subpart AAAAAAA]:

**Table 1: Subpart AAAAAAA, Table 1: Emission Limits for Asphalt Processing Operations**

For	You must meet the following emission limits
1. Blowing stills	a. Limit PAH emissions to 0.003 lb/ton of asphalt charged to the blowing stills; or
	b. Limit PM emissions to 1.2 lb/ton of asphalt charged to the blowing stills.

**Monitoring:**

- The permittee must maintain the operating parameters established under §63.11562(a)(2) as specified in Table 4 of Subpart AAAAAAA. [§63.11563(a)]

**Table 2: Subpart AAAAAAA, Table 4: Operating Limits**

If you comply with the emission limits using	You must establish an operating value for	And maintain <sup>2</sup>
1. A thermal oxidizer	Combustion zone temperature	The 3-hour average combustion zone temperature at or above the operating value established as specified in §63.11562(a)(2).

2. The permittee must develop and make available for inspection by the Administrator, upon request, a site-specific monitoring plan for each monitoring system that addresses the following:
  - [§63.11563(b)]
  - a. Installation of the CPMS probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (*e.g.*, on or downstream of the last control device); [§63.11563(b)(1)]
  - b. Performance and equipment specifications for the probe or interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction system; and [§63.11563(b)(2)]
  - c. Performance evaluation procedures and acceptance criteria (*e.g.*, calibrations). [§63.11563(b)(3)]
    - i. In the site-specific monitoring plan, the permittee must also address the following: [§63.11563(b)(3)(i)]
      - A. Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1), (c)(3), (c)(4)(ii), (c)(7), and (c)(8); [§63.11563(b)(3)(i)(A)]
      - B. Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and [§63.11563(b)(3)(i)(B)]
      - C. Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c), (e)(1), and (e)(2)(i). [§63.11563(b)(3)(i)(C)]
3. The permittee must install, operate, and maintain a continuous parameter monitoring system (CPMS) as specified in §63.11563(c)(1) through (c)(3). [§63.11563(c)]
  - a. The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. [§63.11563(c)(1)]
  - b. To determine the 3-hour average, the permittee must: [§63.11563(c)(2)]
    - i. Have a minimum of four successive cycles of operation to have a valid hour of data. [§63.11563(c)(2)(i)]
    - ii. Have valid data from at least three of four equally spaced data values for that hour from a CPMS that is not out-of-control according to the site-specific monitoring plan. [§63.11563(c)(2)(ii)]

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<sup>2</sup>The 3-hour averaging period applies at all times other than startup and shutdown, as defined in §63.2. Within 24 hours of a startup event, or 24 hours prior to a shutdown event, you must normalize the emissions that occur during the startup or shutdown, when there is no production rate available to assess compliance with the lb/ton of product emission limits, with emissions that occur when the process is operational. The emissions that occur during the startup or shutdown event must be included with the process emissions when assessing compliance with the emission limits specified in Tables 1 and 2 of this subpart.

- iii. Determine the 3-hour average of all recorded readings for each operating day, except as stated in §63.11563(g). The permittee must have at least two of the three hourly averages for that period using only hourly average values that are based on valid data (*i.e.*, not from out-of-control periods). [§63.11563(c)(2)(iii)]
  - c. The permittee must record the results of each inspection, calibration, and validation check of the CPMS. [§63.11563(c)(3)]
4. For each temperature monitoring device, the permittee must meet the CPMS requirements in §63.11563(c)(1) through (c)(3) and the following requirements: [§63.11563(d)]
  - a. Locate the temperature sensor in a position that provides a representative temperature. [§63.11563(d)(1)]
  - b. For a noncryogenic temperature range, use a temperature sensor with a minimum measurement sensitivity of 2.8 °C or 1.0 percent of the temperature value, whichever is larger. [§63.11563(d)(2)]
  - c. If a chart recorder is used, the recorder sensitivity in the minor division must be at least 20 °F. [§63.11563(d)(3)]
  - d. Perform an accuracy check at least semiannually or following an operating parameter deviation: [§63.11563(d)(4)]
    - i. According to the procedures in the manufacturer's documentation; or [§63.11563(d)(4)(i)]
    - ii. By comparing the sensor output to redundant sensor output; or [§63.11563(d)(4)(ii)]
    - iii. By comparing the sensor output to the output from a calibrated temperature measurement device; or [§63.11563(d)(4)(iii)]
    - iv. By comparing the sensor output to the output from a temperature simulator. [§63.11563(d)(4)(iv)]
  - e. Conduct accuracy checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor. [§63.11563(d)(5)]
  - f. At least quarterly or following an operating parameter deviation, perform visual inspections of components if redundant sensors are not used. [§63.11563(d)(6)]
5. If the permittee would like to use parameters or means other than those specified in Table 4 of Subpart AAAAAAA to demonstrate continuous compliance with the emission limits specified in Tables 1 of Subpart AAAAAAA , the permittee must apply to the Administrator for approval of an alternative monitoring plan under §63.8(f). The plan must specify how process parameters established during the initial compliance assessment will be monitored and maintained to demonstrate continuous compliance. [§63.11563(h)]
6. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11563(i)]
7. The permittee must conduct a performance evaluation of each CPMS in accordance with the site-specific monitoring plan. [§63.11563(j)]
8. The permittee must operate and maintain the CPMS in continuous operation according to the site-specific monitoring plan. [§63.11563(k)]

**General Provisions:**

The permittee must comply with the requirements of the General Provisions according to Table 5 of Subpart AAAAAAA.

**Notification, Recordkeeping, and Reporting:**

1. The permittee must submit the notifications specified in §63.11564(a)(1) through (a)(6).  
[§63.11564(a)]
  - a. The permittee must submit all of the notifications in §§63.5(b), 63.7(b); 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply by the dates specified in those sections.  
[§63.11564(a)(1)]
  - b. The permittee must submit a notification of intent to conduct a compliance test at least 60 calendar days before the compliance test is scheduled to begin, as required in §63.7(b)(1).  
[§63.11564(a)(4)]
  - c. The permittee must submit a Notification of Compliance Status according to §63.9(h)(2)(ii). The permittee must submit the Notification of Compliance Status, including the compliance test results, before the close of business on the 60th calendar day following the completion of the compliance test according to §63.10(d)(2). [§63.11564(a)(5)]
  - d. If the permittee is using data from a previously-conducted emission test to serve as documentation of compliance with the emission standards and operating limits of Subpart AAAAAAA, the permittee must submit the test data in lieu of the initial compliance test results with the Notification of Compliance Status required under §63.11564(a)(5). [§63.11564(a)(6)]
2. The permittee must submit a compliance report as specified in §63.11564(b)(1) through (b)(4).  
[§63.11564(b)]
  - a. If the permittee is using a control device to comply with the emission limits, the compliance report must identify the controlled units (*e.g.*, blowing stills, saturators, coating mixers, coaters).  
[§63.11564(b)(1)]
  - b. During periods for which there are no deviations from any emission limitations (emission limit or operating limit) that apply, the compliance report must contain the information specified in §63.11564(b)(2)(i) through (b)(2)(v). [§63.11564(b)(2)]
    - i. Company name and address. [§63.11564(b)(2)(i)]
    - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.11564(b)(2)(ii)]
    - iii. Date of report and beginning and ending dates of the reporting period. [§63.11564(b)(2)(iii)]
    - iv. A statement that there were no deviations from the emission limitations during the reporting period. [§63.11564(b)(2)(iv)]
    - v. If there were no periods during which the CPMS was out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which the CPMS was out-of-control during the reporting period. [§63.11564(b)(2)(v)]
  - c. For each deviation from an emission limitation (emission limit and operating limit), the permittee must include the information in §63.11564(b)(3)(i) through (b)(3)(xii). [§63.11564(b)(3)]
    - i. The date and time that each deviation started and stopped. [§63.11564(b)(3)(i)]
    - ii. The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks. [§63.11564(b)(3)(ii)]
    - iii. The date, time and duration that each CPMS was out-of-control, including the information in §63.8(c)(8). [§63.11564(b)(3)(iii)]

- iv. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period. [§63.11564(b)(3)(iv)]
  - v. A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period. [§63.11564(b)(3)(v)]
  - vi. A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes. [§63.11564(b)(3)(vi)]
  - vii. A summary of the total duration of CPMS downtime during the reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that reporting period. [§63.11564(b)(3)(vii)]
  - viii. An identification of each air pollutant that was monitored at the affected source [§63.11564(b)(3)(viii)]
  - ix. A brief description of the process units. [§63.11564(b)(3)(ix)]
  - x. A brief description of the CPMS. [§63.11564(b)(3)(x)]
  - xi. The date of the latest CPMS certification or audit. [§63.11564(b)(3)(xi)]
  - xii. A description of any changes in CPMS or controls since the last reporting period. [§63.11564(b)(3)(xii)]
- d. Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report specified in §63.11564(b) according to the following dates: [§63.11564(b)(4)]
- i. Subsequent compliance reports must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [§63.11564(b)(4)(iii)]
  - ii. Subsequent compliance reports must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [§63.11564(b)(4)(iv)]
3. The permittee must maintain the records specified in §63.11564(c)(1) through (c)(10). [§63.11564(c)]
- a. A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.11564(c)(1)]
  - b. Copies of emission tests used to demonstrate compliance and performance evaluations as required in §63.10(b)(2)(viii). [§63.11564(c)(2)]
  - c. Documentation that shows that the following conditions are true if the permittee uses a previously-conducted emission test to demonstrate initial compliance as specified in §63.11562(a)(1)(ii): [§63.11564(c)(3)]
    - i. The test was conducted within the last 5 years; [§63.11564(c)(3)(i)]
    - ii. No changes have been made to the process since the time of the emission test; [§63.11564(c)(3)(ii)]
    - iii. The operating conditions and test methods used for the previous test conform to the requirements of this subpart; and [§63.11564(c)(3)(iii)]
    - iv. The data used to establish the value or range of values of the operating parameters, as specified in §63.11562(a)(2)(ii), were recorded during the emission test. [§63.11564(c)(3)(iv)]

- d. Documentation that identifies the operating parameters and values specified in Table 4 of Subpart AAAAAAA and that contains the data used to establish the parameter values as specified in §63.11562(a)(2). [§63.11564(c)(4)]
  - e. Copies of the written manufacturers performance specifications used to establish operating parameter values as specified in §63.11562(b)(3)(iii). [§63.11564(c)(5)]
  - f. Documentation of the process knowledge and engineering calculations used to demonstrate initial compliance as specified in §63.11562(e). [§63.11564(c)(6)]
  - g. Documentation of the process knowledge and engineering calculations used to establish the value or range of values of operating parameters as specified in §63.11562(f). [§63.11564(c)(7)]
  - h. A copy of the site-specific monitoring plan required under §63.11563(b). [§63.11564(c)(8)]
  - i. A copy of the approved alternative monitoring plan required under §63.11563(h), if applicable. [§63.11564(c)(9)]
  - j. Records of the operating parameter values required in Table 4 of this subpart to show continuous compliance with each operating limit that applies. [§63.11564(c)(10)]
4. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual compliance certification reports required by Section V of this permit.
5. The permittee shall submit all documentation to the Administrator, with copies submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

<b>Permit Condition 062015-009</b>		
10 CSR 10-6.060, Construction Permits Required		
Construction Permit 062015-009, Issued June 15, 2015		
EP #	Description	Control Device
BS-AB2-B	Asphalt Blow Still #34, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 893918, Installed 1993	EP DFTO-101: Direct Fired Thermal Oxidizer, MHDR= 18 MMBtu/hr, combusts natural gas, Mfr: Zeeco, Installed 2001; and EP DFTO-102: Direct Fired Thermal Oxidizer, MHDR = 25 MMBtu/hr, combusts natural gas, Mfr: John Zink Model:DBY-O, Installed June 2015
BS-AB2-A	Asphalt Blow Still #35, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 933918, Installed 1993	
BS-AB1-B	Asphalt Blow Still #36, MHDR= 17.5 ton/hr, Mfr: General Machinery, Installed 1990	
BS-AB1-A	Asphalt Blow Still #37, MHDR= 17.5 ton/hr, Mfr: Nueces Model: B5-15, Installed 1990	
3-08A	Asphalt Storage Tank #1, 23,000 gallon capacity, Mfr: General Steel Model: 876503-1, Installed 1989	
3-09A	Asphalt Storage Tank #2, 23,000 gallon capacity, Mfr: General Steel Model: 876503-2, Installed 1989	
3-30A	Asphalt Storage Tank #3, 39,250 gallon capacity, Mfr: General Steel Model: 002238-1, Installed 2000	
3-40A	Asphalt Storage Tank #4, 39,250 gallon capacity, Mfr: General Steel Model: 002238-2, Installed 2000	
3-05	Asphalt Storage Tank #7, 189,000 gallon capacity, Mfr: General Steel Model: 831063-1, Installed 1990	
3-06	Asphalt Storage Tank #8, 169,000 gallon capacity, Mfr: General Steel Model: 831063-2, Installed 1989	

3-07	Asphalt Storage Tank #9, 189,000 gallon capacity, Mfr: General Steel Model: 893506, Installed 1990	
Loading	Loading Station	

**Operational Limitation:**

1. The permittee shall only replace up to 50% of the asphalt in the blowing operation with vacuum tower bottoms and polyphosphoric acid in any consecutive 12 month period. [Special Condition # 2.A.]
2. The permittee shall control emissions from the affected equipment using the control devices as listed in the table above, while this equipment is in operation. [Special Condition # 3.A.]
3. The permittee shall operate and maintain the direct fired thermal oxidizers listed in the table above in accordance with the manufacturer's specifications. [Special Condition # 3.B.]
4. The permittee shall set the average operating temperature of each direct fired thermal oxidizer listed in the table above in accordance with the performance testing required in 40 CFR part 63, Subpart AAAAAAA. The permittee shall operate the oxidizers at or above this average operating temperature. [Special Condition # 3.C.]

**Monitoring/Recordkeeping**

1. The permittee shall continuously monitor and record the combustion chamber temperature of each direct fired thermal oxidizer listed in the table above while the oxidizers are in operation to ensure that the minimum average temperature is at or above the temperature set in the performance test. The average temperature shall be based on a three hour averaging period, in accordance with 40 CFR part 63, Subpart AAAAAAA. [Special Condition # 3.C.]
2. The permittee shall monitor and record the amount of vacuum tower bottoms and polyphosphoric acid added to the blowing system on a monthly basis, and shall calculate the percent of asphalt replaced by these additives.
3. The permittee shall keep a copy of the manufacturer's specifications on site at all times.
4. The permittee shall maintain an operating and maintenance log for the Thermal Oxidizers which shall include the following:
  - a. Incidents of malfunction, with impact on emissions, duration or event, probable cause, and corrective actions; and
  - b. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
5. The permittee shall use Attachments Additive Replacement, and I/M Log, or equivalents, in addition to continuous temperature measurements, to demonstrate compliance.
6. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

1. The permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than thirty days after the end of the month.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

<b>Permit Condition 052015-004</b> 10 CSR 10-6.6060, Construction Permits Required Construction Permit 052015-004, Issued May 11, 2015		
EP #	Description	Control Device
2-9	Honeycomb Dryer Dump Stack and Dryer/Heater, installed 1981, 16 MMBtu/hr, natural gas fired, 6 tons/hour production rate. EP 2-9 represents uncontrolled emissions from this unit.	Regenerative Thermal Oxidizer (RTO), 3.5 MMBtu/hr, natural gas fired, installed 2000
2-9A	Regenerative Thermal Oxidizer (RTO), 3.5 MMBtu/hr, natural gas fired. EP 2-9A represents controlled emissions through the RTO. Installed 2000	N/A

**Emission Limitation:**

1. The permittee shall emit less than 2.0 tons of formaldehyde from the honeycomb dryer in any consecutive 12 month period. [Special Condition # 2.A.]

**Operational Limitation:**

1. The permittee is permitted to operate the honeycomb dryer both with and without using the RTO listed in the table above to control emissions. The screen is considered part of the RTO. When the RTO is being used, the permittee shall operate and maintain the RTO and screen in accordance with the manufacturer's specifications. [Special Condition # 3.A.]
2. The permittee shall establish a minimum operating temperature of the RTO as specified in Performance Testing below.

**Production Tracking:**

1. The permittee shall monitor and record the daily 24-hour average production rate in tons per hour. [Special Condition # 4.A.]
2. The first time the permittee reaches an actual daily production rate of greater than 5.05 tons per hour, based on a 24 hour averaging period, the permittee shall submit a notification to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov). Within 90 days of this date, the permittee shall conduct performance testing as specified in Performance Testing below. [Special Condition # 4.B.]
3. After the first time a daily production rate of 5.05 tons per hour, based on a 24 hour averaging period, is reached, the permittee may discontinue tracking of the daily production rate. [Special Condition # 4.C.]

**Performance Testing:<sup>3</sup>**

1. The permittee shall conduct the initial performance test within 90 days after the date the daily production rate exceeds 5.05 tons per hour for the first time. This date is determined by the records required in Production Tracking above. [Special Condition # 5.B.]

<sup>3</sup> The Performance Testing provisions only apply once the installation has surpassed the production rate of 5.05 tons per hour, based on a 24-hour averaging period. Until the installation reaches that production rate, there are no testing requirements.

2. The permittee shall conduct performance testing to determine the formaldehyde emissions factor (in pounds of formaldehyde per ton of fiberglass processed) from the honeycomb dryer with and without the use of the RTO. [Special Condition # 5.A.]
3. The permittee shall conduct the performance testing during periods of representative conditions and shall conduct the testing at 90-100% of the maximum hourly design rate of 6.0 tons per hour (ie 5.4 tph to 6.0 tph), not including periods of start-up, shutdown, or malfunction. If the testing is not conducted within this ten percent range, then the new maximum process rate shall be set at 110%, not to exceed 6.0 tons per hour. [Special Condition # 5.D.]
4. The permittee shall conduct subsequent performance tests once every five years, or upon replacement of a permanent binder with a higher formaldehyde content, whichever comes first. Subsequent testing shall occur 90 days before or 90 days after the most recent test for the five year testing cycle, or within 90 days after the replacement of a permanent binder with a higher formaldehyde content. [Special Condition # 5.B.]
5. The permittee shall submit a test report that fully accounts for all operational and emission parameters addressed both in the cited construction permit, this operating permit, as well as in any other applicable state or federal regulations. The test report shall establish the minimum operating temperature in °F for the RTO and the formaldehyde emissions factor both with and without the use of the RTO. [Special Condition # 5.F.]
6. The permittee shall submit a completed proposed test plan to the Air Pollution Control Program at least 30 days prior to the proposed test date so that the Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The proposed test plan may serve the purpose of notification and must be approved by the director prior to conducting the required emission testing. [Special Condition # 5.C.]
7. The permittee shall submit one copy of a written report of the performance test results to the director within 30 days of completion of the testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run. [Special Condition # 5.E.]
8. The permittee shall submit all proposed test plans and all testing results to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [stacktesting@dnr.mo.gov](mailto:stacktesting@dnr.mo.gov).
9. Within 30 days after the Program accepts the initial performance test, the permittee shall submit updated installation wide potential to emit calculations for all pollutants to the Air Pollution Control Program's Permit Section at the mailing address above. [Special Condition # 6]

### **Monitoring/Recordkeeping**

1. Prior to the daily production rate reaching a value of 5.05 tons/hour, as determined by the records required in Production Tracking above, the permittee shall use the emission factors developed during the February 2014 performance test to demonstrate compliance with the emission limitation. After completion of any performance test described in performance testing above, the permittee shall use the emission factor determined during the most recent performance test to demonstrate compliance with the emission limitation. [Special Condition # 5.G.]
2. The permittee shall maintain records of the monthly and consecutive 12-month formaldehyde emissions from units listed in the table above. This includes both controlled and uncontrolled formaldehyde emissions. [Special Condition #2.B.]
3. The permittee shall continuously monitor and record the operating temperature of the RTO listed in the table above. The minimum operating temperature shall be established by the most recent performance test. The minimum operating temperature is re-established with every performance

test, when the results are accepted by the Air Pollution Control Program. The monitoring equipment shall be located such that the Department of Natural Resources' employees may easily observe them. [Special Condition # 3.B.]

4. The permittee shall keep a copy of the manufacturer's specifications for the RTO and the screen site at all times. [Special Condition # 3.A.]
5. The permittee shall maintain an operating and maintenance log for the RTO and screen which shall include the following: [Special Condition # 3.C.]
  - a. The dates and times the RTO is being used, and is not being used, to control emissions from the honeycomb dryer.
  - b. Incidents of malfunction, with impact on emissions, duration or event, probable cause, and corrective actions; and
  - c. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
6. The permittee shall use Attachments Formaldehyde, Production, and I/M Log, or equivalents, in addition to continuous temperature measurements, to demonstrate compliance.
7. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

**Reporting:**

1. The permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than thirty days after the end of the month.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

<b>Permit Condition 072012-012</b>		
10 CSR 10-6.6060, Construction Permits Required		
Construction Permit 072012-012, Issued July 26, 2012		
EP #	Description	Control Device
EP 2-9B	Fiberglass Trim Chop System, installed after 1971	Dust Collector

**Operational Limitation:**

1. The permittee shall control emissions from the fiberglass trim chop system using a dust collector. [Special Condition # 1.A.]
2. The permittee shall operate and maintain the dust collector in accordance with the manufacturer's specifications. The dust collector shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. [Special Condition # 1.B.]
3. The permittee shall keep replacement filters for the dust collector on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (ie temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition # 1.C.]

**Monitoring/Recordkeeping:**

1. The permittee shall monitor and record the operating pressure drop across the dust collector at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition # 1.D.]
2. The permittee shall keep a copy of the manufacturer’s specifications and performance warranty on site at all times.
3. The permittee shall maintain an operating and maintenance log for the dust collector which shall include the following:
  - a. Incidents of malfunction, with impact on emissions, duration or event, probable cause, and corrective actions; and
  - b. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4. The permittee shall use Attachments I/M Log, Pressure Drop Log, or equivalents, to demonstrate compliance.
5. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

1. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual compliance certification reports required by Section V of this permit.
2. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

<b>Permit Condition 6.220</b>			
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants			
EP #	Description	Control Device	Opacity Limitation and Exception Limitation
EP 1-2	Felt Mill No. 1 Sawdust Holding tank, Installed 1967	Wheelabrator #86 Model 36	40% and 60%
EP A-2	Felt Mill No. 2 Sawdust Holding tank, Installed 1967	WCC Dust Collector	40% and 60%
	Sawdust Unload Station, installed after 1971		20% and 60%

**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than the opacity limitation shown in the table above for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
2. Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to the exception limitation shown in the table above for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
3. Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

**Monitoring:**

1. Monitoring schedule:
  - a. The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
    - i. The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
      - 1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
2. If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
3. Observations are only required when the emission units are operating and when the weather conditions allow.
4. Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
5. The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
6. For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

**Recordkeeping:**

1. The permittee shall maintain records of all observation results for each emission unit using Attachments Method 9 and Method 22, or equivalents to demonstrate compliance.
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

1. The permittee shall report any exceedance of the limitations no later than thirty days after the date of the observation that indicated an exceedance of the emission limitation.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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 as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

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

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

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

and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

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

#### **10 CSR 10-6.060 Construction Permits Required**

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

#### **10 CSR 10-6.065 Operating Permits**

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

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

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.

#### **10 CSR 10-6.100 Alternate Emission Limits**

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

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

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

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

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

**10 CSR 10-6.150 Circumvention**

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

**10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is a State Only permit requirement.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**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. Issuance of a renewal operating permit does not restart the 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 6.170, or its equivalent, noting the following:

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

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

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

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

**This requirement is a State Only permit requirement.**

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.

**10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;

- b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
- a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

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

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

## V. General Permit Requirements

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

<b>10 CSR 10-6.065(6)(C)1.B Permit Duration</b> <b>10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits</b>
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This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

<b>10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements</b>
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- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

**10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

**10 CSR 10-6.065(6)(C)1.G General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

**10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

**10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None

**10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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 EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov). All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(6)(C)7 Emergency Provisions**

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

#### **10 CSR 10-6.065(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov) as well as

EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov) as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

**10 CSR 10-6.020(2)(R)34 Responsible Official**

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

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

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

## VI. Attachments

Attachments follow.











**Attachment Method 22**

Method 22 Visible Emissions Observations					
Installation Name			Observer Name		
Location			Date		
Sky Conditions			Wind Direction		
Precipitation			Wind Speed		
Time			Emission unit		
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.					
Minute	Seconds				Comments
	0	15	30	45	
	Visible Emissions Yes (Y) or No (N)				
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

**Attachment Method 9**

Method 9 Opacity Observations									
Installation Name:						Sketch of the observer's position relative to the emission unit			
Emission Point:									
Emission Unit:									
Observer Name and Affiliation:									
Observer Certification Date:									
Method 9 Observation Date:									
Height of Emission Point:									
Time:						Start of observations	End of observations		
Distance of Observer from Emission Point:									
Observer Direction from Emission Point:									
Approximate Wind Direction:									
Estimated Wind Speed:									
Ambient Temperature:									
Description of Sky Conditions (Presence and color of clouds):									
Plume Color:									
Approximate Distance Plume is Visible from Emission Point:									
Minute	Seconds				1-minute Avg. % Opacity <sup>9</sup>	6-minute Avg. % Opacity <sup>10</sup>	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity) <sup>11</sup>								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									

<sup>9</sup> 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.

<sup>10</sup> 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.

<sup>11</sup> Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

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The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%. Exception:  
The emission unit is in compliance if one six-minute average opacity is greater than 20 %, but less than 40 %.

Was the emission unit in compliance at the time of evaluation (yes or no)? \_\_\_\_\_

\_\_\_\_\_  
Signature of Observer



**Attachment Formaldehyde**

Month	Fiberglass Mat Processed with RTO (tons) <sup>17</sup>	Fiberglass Mat Processed without RTO (using RTO bypass) (tons) <sup>18</sup>	Controlled Emission factor (lb/ton) <sup>19</sup>	Uncontrolled Emission factor (lb/ton) <sup>20</sup>	Controlled Emissions (tons) <sup>21</sup>	Uncontrolled Emissions (tons) <sup>22</sup>	Total Monthly Emissions (tons) <sup>23</sup>	Total 12-Month Emissions (tpy) <sup>24</sup>

<sup>17</sup> The amount of fiberglass mat processed when using the RTO.

<sup>18</sup> The amount of fiberglass mat processed when RTO is bypassed.

<sup>19</sup> The permittee shall use the emission factors established during the most recent performance test, as described in Permit Condition 052015-004.

<sup>20</sup> The permittee shall use the emission factors established during the most recent performance test, as described in Permit Condition 052015-004.

<sup>21</sup> Calculated by multiplying the tons of fiberglass mat processed when using the RTO by the controlled emission factor.

<sup>22</sup> Calculated by multiplying the tons of fiberglass mat processed when RTO is bypassed by the uncontrolled emission factor.

<sup>23</sup> Sum of uncontrolled and controlled emissions.

<sup>24</sup> Sum of the total emissions of the previous 12 months. The total must include SSM emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050. **A total less than 2.0 tons indicates compliance.**

## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

TAMKO Building Products, Inc. manufactures roofing products and includes such processes and products as glass mat, asphalt coatings and saturants. The operations at the installation are divided into two main manufacturing operations: Refinery Operations and Fiberglass Mat Manufacturing Operations. The installation is subject to the following federal regulations, 40 CFR part 60 Subparts Dc, IIII, and UU; 40 CFR part 63 Subparts CCCCCC and AAAAAAAA. The installation has potential emissions greater than the major source thresholds for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, VOC, and CO. The installation is an area source of HAPs.

#### **Fiberglass Mat production**

The Fiberglass Mat Manufacturing Operations include the wet-forming manufacturing process designed to form fibers of fiberglass into a mat to be used in various products. This process begins with the preparation of glass fibers by dumping fiberglass fiber into one of the two mixing tanks filled with water and certain additives to modify the whitewater properties. The mixture is agitated with large mixers, pumped to a machine chest, and then to a head box. The mixture overflows on a wire section forming a loose glass mat. The excess water is vacuumed from the loose mat. The loose mat is saturated with urea-formaldehyde binder solution and cured in the dryer. The mat is then cooled down, trimmed, cut into desired widths, wound into rolls, and then packaged.

#### **Refinery Operations**

This is the preparation of asphalt flux. This preparation, called "Blowing", involves the oxidation of asphalt flux by bubbling air through liquid asphalt flux in blowing stills. Inorganic salts such as ferric chloride (FeCl<sub>3</sub>) may be used as catalysts to achieve desired properties and to increase the rate of reaction in the blowing still. The asphalt flux is received at the railcar/truck unloading stations (EP 3-04 and 3-03). The flux is placed in storage tanks (EP 3-05, EP 3-06, and EP 3-07). The flux is then processed in the blowstills (EP BS-AB1-A, EP BS-AB1-B, EP BS-AB2-A, and EP BS-AB2-B). When the blowing process is complete, the finished product is moved to storage tanks (EP3-08A, EP 3-09A, EP 3-30A, and EP 3-40A) or into tanker trucks. Finished product in the storage tanks is moved to the loading station and then is shipped off site. Emissions from this process are controlled by two thermal oxidizers, (EP DFTO-101 or EP DFTO-102).

#### **Equipment Changes Since Previous Operating Permit**

Since issuance of the previous operating permit, TAMKO has removed the following equipment from the site. Additionally, EP 2-12, Fiberglass Mat Plant Vacuum System, was listed in the previous permit but was never installed.

**Table 3: Removed Equipment**

EP #	Description
<b>Felt Mill Operations</b>	
EP 1-2	Feed Bin part only
	Sawdust Room
EP 1-3	Felt Mill #1 Third Dryer Section Heater
EP 1-4	Felt Mill #1 Second Dryer Section Heater
EP 1-5	Felt Mill #1 First Dryer Section Heater

EP #	Description
	Whitewater System
	Machine Chest Tank
	Stock Chest
	Whitewater Chest
	Save-All Tank
	Paper Chest
	Two Side Hills
	Head Box
	Machine's Shower
	Rewinder
	Roof and Wall Fans
	Vac Pumps
	Vat Machine
	Pulper
	Trim Blower
	Defoamer Tote
	Anti-Stick Tote
<b>Fiberglass Mat Operations</b>	
	Viscosity Modifier Tote
	Chortie Unit

This permit contains the following equipment that was not listed in the previous operating permit. None of these units are assigned emission point numbers.

**Table 4: Equipment not listed in previous operating permit**

Unit Descriptions
2 Natural Gas fired Emergency Generators, 150 kW, spark ignition
5 Parts Washers, 2-78 gallon, 3-8 gallon capacity, use Safety Kleen Premium Solvent

The reported emissions for the previous five years and the installation's potential to emit are shown in the table below. Potential emissions were calculated for specific emission units and do not include the sources listed as Emission Units without Limitations. Emission factors were provided by the installation as part of the application.

**Table 5: Emissions Profile, tons per year**

Pollutants	Reported Emissions					Potential Emissions
	2013	2014	2015	2016	2017	
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	19.00	34.32	16.02	21.14	21.08	>250
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	18.79	25.12	6.61	8.71	8.76	>250
Sulfur Oxides (SO <sub>x</sub> )	41.56	45.14	41.72	50.39	51.85	>250

Pollutants	Reported Emissions					Potential Emissions
	2013	2014	2015	2016	2017	
Nitrogen Oxides (NO <sub>x</sub> )	33.53	29.28	29.91	40.94	40.90	<100
Volatile Organic Compounds (VOC)	14.25	31.51	31.97	40.29	41.32	>100
Carbon Monoxide (CO)	74.14	73.87	75.18	98.09	99.31	>250
Hazardous Air Pollutants (HAPs)	1.39	1.93	1.31	1.81	1.72	<10/25

**Permit Reference Documents**

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

1. Part 70 Operating Permit Application, received July 26, 2013; revised September 12, 2014, September 17, 2014, April 11, 2016, May 9, 2016, and June 1, 2016;
2. 2017 Emissions Inventory Questionnaire, received April 9, 2018;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4. webFIRE; and
5. All documents listed in Construction Permit History

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

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

**40 CFR Part 60 Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines**

**40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

These regulations were not applied in the previous operating permit because the installation did list any reciprocating internal combustion engines in the permit application. The application for this permit indicates these regulations do not apply, however, during the technical review of the application it was determined that these regulations do apply. See MACT and NSPS Sections of this Statement of Basis for additional explanation.

**40 CFR Part 63 Subpart CCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities**

This regulation was not applied in the previous operating permit because the gasoline tank was not listed in the permit application. The application for this permit indicates this regulation does not apply, however, during the technical review of the application it was determined that this regulation does apply. See MACT Section of this Statement of Basis for additional explanation.

**40 CFR part 63 Subpart AAAAAAA, National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing**

This regulation was not applied in the previous operating permit. The permit was issued January 29, 2009 and this regulation was promulgated December 2, 2009. The application for this permit indicates this regulation applies. See MACT Section of this Statement of Basis for additional explanation.

**Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

See Other Regulatory Requirements

**Construction Permit History**

The following construction permits have been issued to this installation:

1. Construction Permit 0393-012  
This permit authorized the replacement of blow still tanks 1 and 4. This permit was rescinded by the Construction Permit Modification, PAMS project 2260-0094-018. Therefore, this construction permit does not appear in this operating permit.
2. Construction Permit Modification, PAMS project 2260-0094-018  
This modification rescinds Construction Permit 0393-012. It was determined that the two asphalt blow stills (EP's 3-1 and 3-2) are like kind replacements for blow stills 1 and 4. This modification does not contain any special conditions. Therefore, this construction permit modification does not appear in the operating permit.
3. Construction Permit 0594-032  
This permit authorized modifications to the existing fiberglass mat line by replacing the gravity feed portion of the machine chest with a pressure feed head box while extending the existing oven hood to increase dwell time. This construction permit does not contain any special conditions, and therefore does not appear in this operating permit.
4. No Permit Required Letter, PAMS project 2260-0094-020  
This letter authorizes the replacement of 75-150 steam dryers with 45-150 steam dryers on Felt Mill No.1. These changes do not trigger any of the permitting requirements in the construction permit rule.
5. Construction Permit 0496-004  
This permit authorizes construction of Boiler 5, a 25.2 million British thermal units per hour natural gas fired boiler. This unit has been removed, therefore this construction permit does not appear in the operating permit.
6. No Permit Required Letter, PAMS project 22600-094-022  
This letter authorizes installation of the Felt Mill No. 2 dryer and upgrades the Glass Mat Line Vacuum Blower 3. There are five proposed natural gas infra-red burner units that will be installed to the underside of the wet end on Felt Mill No. 2 Dryer section (EPs A-3, A-4, A-5, and A-6). The burners' exhaust through the dryer hood in conjunction with the Felt Mill No. 2 Heater. Each burner is rated at 840,000 British thermal units per hour, with a combined capacity of 4.2 million British thermal units per hour. The upgrade of the Glass Mat Line Vacuum Blower 3 (EP 2-7C) consists of increasing the blower capacity from 2,250 CFM to 2,500 CFM. These changes do not trigger any of the permitting requirements in the construction permit rule.

7. No Permit Required Letter, PAMS project 1998-08-040  
This letter authorizes the testing of a pilot unit for the possible control of formaldehyde emissions from the glass mat production line.
8. No Permit Required Letter, PAMS project 1999-11-037  
This letter authorizes the addition of a baghouse dust collector and the replacement of 2-3,750 CFM fans with 1-6,500 fan on the sawdust handling system. The baghouse is a 10,000 CFM Wheelabrator Modular Jet III dust collector. It will be installed in series downstream of two existing cyclone systems. These systems control emissions from the saw dust storage tanks, EP's 1-2 and A-2. This change does not trigger any of the permitting requirements in the construction permit rule.
9. No Permit Required Letter, PAMS project 2000-05-125  
This letter authorizes the replacement of four horizontal storage tanks (19,000 gallon capacity each) with two vertical storage tanks (39,000 gallon capacity each). Each tank is equipped with an Eclipse TJ Burner System for tank temperature control with a five million British thermal units per hour natural gas fired burner. The initial application (dated May 16, 2000) states that it is the installation's intent to control the storage tanks with a thermal oxidizer. However, in correspondence dated August 2, 2000, the installation requested that to evaluate the potential emissions uncontrolled. The storage tanks are subject to NSPS Subparts Kb and UU. These changes do not trigger any of the permitting requirements of the construction permit rule.
10. No Permit Required Letter, PAMS project 2000-05-148  
This letter authorizes the replacement of the existing eight million British thermal units per hour afterburner with a twelve million British thermal units per hour afterburner. This change does not trigger any of the permitting requirements of the construction permit rule.
11. Construction Permit 112000-012  
This permit authorizes construction of a regenerative thermal oxidizer on the glass mat oven (aka the honeycomb dryer). The regenerative thermal oxidizer has a flow rate of 25,000 standard cubic feet per minute and includes a 3.5 million British thermal units per hour burner that uses natural gas as combustion fuel. This construction permit does not contain any special conditions and therefore does not appear in the operating permit.
12. No Permit Required Letter, PAMS project 2001-04-112  
This letter authorizes the use of particleboard/fiberboard sawdust as a raw material in the felt papermaking process. The particleboard/fiberboard is produced using a urea-formaldehyde based bonding agent. Although formaldehyde emissions increase, they remain below the permitting threshold. Therefore this change does not trigger any of the permitting requirements in the construction permit rule.
13. Construction Permit 062001-004  
This permit authorizes construction of an 18 million British thermal units per hour direct fired thermal oxidizer on the blow stills. This thermal oxidizer is a replacement for an existing eight million British thermal units per hour direct fired thermal oxidizer. Although not mentioned in the construction permit, the applicant also listed a waste heat recovery boiler with this application. This boiler is part of the direct fired thermal oxidizer unit. This permit does not contain any special conditions.
14. No Permit Required Letter, PAMS project 2002-12-121  
This letter authorizes the installation of a new sawdust truck dumping station with retractable seals and hopper with a pneumatic conveying system. The new dumping station is a replacement for an existing station. This new equipment is controlled by the cyclone/baghouse arrangement described

in No Permit Required, PAMS project 1999-11-037. This change does not trigger any of the permitting requirements in the construction permit rule.

15. No Permit Required Letter, PAMS project 2004-01-044

This project re-evaluates the project proposed under No Permit Required, PAMS project 2002-12-121. After installing the system described in that project, the installation discovered that the capture efficiency of the new sawdust dumping station is lower than originally reported. Although emissions from leakage at the dumping station result in higher emission rates than expected, the overall emissions have decreased from the addition of the control device. Therefore, the No Permit Required determination of PAMS project 2002-12-121 is upheld.

16. No Permit Required Letter, PAMS project 2004-10-074

This letter authorizes the modification of the East Preheater Direct fired thermal oxidizer (EP 3-02). The unit is used as a control device for the asphalt blowstill process and as an auxiliary asphalt heater. The modification consists of extending the burn chamber by four feet, to increase the dwell time of the exhaust fumes from the asphalt blowing process. This modification is not considered a debottlenecking project, and no increase in emissions is expected. Therefore, this change does not trigger any of the permitting requirements in the construction permit rule.

17. No Permit Required Letter, PAMS project 2007-01-021

This letter authorizes the modification of the large direct fired thermal oxidizer. The modification consists of installing the necessary components to improve the method of the fume line oil. The new method will pump the accumulated fine line oil to atomized nozzles and inject the oil directly into the combustion chamber to increase efficiency. This change does not trigger any of the permitting requirements in the construction permit rule.

18. No Permit Required Letter, PAMS project 2007-08-130

This letter authorizes the addition of fiberglass strands into the paper roll felt product. The paper roll felt product will be manufactured using recycled paper and/or cardboard, saw dust, and water. The chopped fiberglass strands will be introduced into the wet paper slurry in the early stage of the process. This change does not trigger any of the permitting requirements in the construction permit rule.

19. No Permit Required Letter, PAMS project 2008-02-020

This letter authorizes the use of agricultural based fibers and other natural fibers as a substitute for saw dust in the felt manufacturing process. The new fiber material does not affect the emissions or production rate of the process. This change does not trigger any of the permitting requirements in the construction permit rule.

20. No Permit Required Letter, PAMS project 2009-08-059

This letter authorizes the relocation of an ancillary draft fan for the small direct fired thermal oxidizer. This change does not trigger any of the permitting requirements in the construction permit rule.

21. No Permit Required Letter, PAMS project 2010-01-041

This letter authorizes the replacement of the fiberglass honeycomb dryer burner. This change qualifies as a like-kind replacement and therefore does not trigger any of the permitting requirements in the construction permit rule.

22. Permit Required Letter, PAMS project 2010-03-005

This letter evaluated the need for a construction permit for the use of petroleum resin and polyphosphoric acid in the asphalt blowing stations and determined that a permit is required. The installation obtained construction permit 052010-008 for these activities.

23. Construction Permit 052010-008

This Section 5 permit was issued May 12, 2010 to authorize the use of petroleum resin and polyphosphoric acid in the asphalt blowing stations. This permit is superseded by Construction Permit 062015-009

24. Construction Permit 102010-007

This Section 5 permit was issued for the installation of 2-25.2 MMBtu/hr natural gas fired boilers to replace three existing boilers. This project also allows the replacement of three tank heater burners. This permit does not contain any special conditions and therefore does not appear in the operating permit.

25. Construction Permit Amendment 052010-008A

This permit amendment was issued to update emissions of phosphorus from the polyphosphoric acid combustion permitted in permit 052010-008. The performance testing indicated that emissions are anticipated to be less than the SMAL value, therefore no further action is required. This amendment is superseded by Construction Permit 062015-009.

26. No Permit Required Letter, PAMS project 2011-10-025 and 2011-11-037

This letter evaluated the construction permit applicability for two maintenance projects: replacement of the burner tip and flame stabilization cone on the large DFTO and the addition of a noise reducing muffler on the honeycomb dryer RTO. These changes do not trigger any of the permitting requirements in the construction permit rule.

27. No Permit Required Letter, PAMS project 2012-03-082

This letter evaluates the construction permit applicability for the following changes: installation of barrier traps around the honeycomb glass mat dryer, installation of three capture hoods for the honeycomb glass mat dryer, and installation of an air make up system with a new heat recovery exchanger. These changes do not trigger any of the permitting requirements in the construction permit rule.

28. Construction Permit 072012-012

This Section 5 permit was issued July 26, 2012 to authorize the installation of a chopper and blower system for the fiberglass mat trim. The special conditions of this permit appear in the operating permit as Permit Condition 072012-012.

29. Permit Required Letter, PAMS project 2013-03-017

This letter evaluated the need for a construction permit for an increase in the maximum processing rate for the honeycomb dryer and determined that a permit is required. The installation obtained construction permit 092013-009 for this activity.

30. Construction Permit 092013-009

This Section 5 permit was issued September 11, 2013 to authorize a removal of a software restriction that will increase the maximum hourly design rate of the honeycomb dryer. This permit is superseded by Construction Permit 052015-004.

31. Construction Permit 092014-004

This Section 5 permit was issued September 8, 2014 to authorize the replacement of the 8.73 MMBtu/hr thermal oxidizer with a 25 MMBtu/hr thermal oxidizer (EP DFTO-102). This permit is superseded by Construction Permit 062015-009.

32. No Permit Required Letter, PAMS project 2014-08-015

This letter evaluated the construction permit applicability for replacement of the 5.9 MMBtu/hr heater for Asphalt Tank #7. This change qualifies as a like-kind replacement and does not trigger any of the permitting requirements in the construction permit rule.

33. Construction Permit 062015-009

This Section 5 permit was issued June 15, 2015 to authorize the increase in petroleum additive usage from 20% to 50% in the asphalt blowing operation. This permit supersedes construction permits 052010-008 and 092014-004. This permit establishes a 10 ton/year installation-wide hydrogen chloride emission limitation which appears as Permit Condition PW 062015-009, as well as emission unit specific limitations that appear as Permit Condition 062015-009.

34. No Permit Required Letter, PAMS project 2014-09-010

This project is a correction to No Permit Required Letter, Project # 2014-08-015 to update the maximum hourly design rate of the new unit to 6.052 MMBtu/hr. This change still qualifies as a like-kind replacement and does not trigger any of the permitting requirements in the construction permit rule.

35. No Permit Required Letter, PAMS project 2014-12-025

This letter evaluated the construction permit applicability for the installation of an 150 kW emergency generator. This change does not trigger any of the permitting requirements in the construction permit rule.

36. Construction Permit 052015-004

This Section 5 permit was issued May 11, 2015 to authorize a removal of a software restriction that will increase the maximum hourly design rate of the honeycomb dryer. This permit supersedes construction permit 092013-009. The special conditions of this permit appear in the operating permit as Permit Condition 052015-004.

37. No Permit Required Letter, PAMS project 2015-10-005

This letter evaluated the construction permit applicability for the installation of a vacuum system in the Fiberglass Mat Building. This change does not trigger any of the permitting requirements in the construction permit rule.

**New Source Performance Standards (NSPS) Applicability**

**40 CFR part 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators**

**40 CFR part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978**

**40 CFR part 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units**

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

These regulations apply to steam generating units with the following parameters:

Rule	Constructed/modified/reconstructed after....	Maximum design heat input capacity...
D	August 17, 1971	greater than 250 MMBtu/hr
Da	September 18, 1978	greater than 250 MMBtu/hr .
Db	June 19, 1984	greater than 100 MMBtu/hr
Dc	June 19, 1984	between 10 and 100 MMBtu/hr

Boilers #7 and #8 (EP-07 and EP-08) are both 25.2 MMBtu/hr natural gas fired units installed after June 19, 1984 and therefore meet the applicability of Subpart Dc. As these units combust only natural gas, they are no applicable emissions limitations or testing requirements in the regulation. The only applicable requirements are the recordkeeping provisions of §60.48c(g). Because all the combustion units on site (even those not subject to Dc) are natural gas fired, the installation may use the option presented in §60.48c(g)(3) which has been included in Permit Condition Subpart Dc.

**40 CFR part 60 Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978**

**40 CFR part 60 Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984**

**40 CFR part 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984**

These regulations apply to storage vessels with the following parameters:

Rule	Constructed/modified/reconstructed ....	With contents and capacities.....
K	Between June 11, 1973 and May 19, 1978	Petroleum liquids, >40,000 gallons
Ka	Between May 18, 1978 and July 23, 1984	Petroleum liquids, >40,000 gallons
Kb	After July 23, 1984	Volatile organic liquids, >19,813 gallons

The liquid fuel and process tanks contain materials that either do not meet the definition of volatile organic liquids, or have capacities or vapor pressures less than the applicability values. Therefore this regulation does not apply to the installation.

**40 CFR part 60 Subpart UU, Asphalt Processing and Asphalt Roofing Manufacture**

This regulation applies to the following operations: Saturators and mineral handling and storage facilities that commence construction or modification after November 18, 1980 at asphalt roofing plants; and asphalt storage tanks and blowing stills that commence construction or modification after November 18, 1980 (roofing asphalt) or May 26, 1981 (nonroofing asphalt) at asphalt processing plants, petroleum refineries, and asphalt roofing plants.

The equipment subject to this regulation are found in the Refinery Operations section of the installation and include all the sources listed in Permit Condition Subpart UU. This installation does not perform Saturator operations or mineral handling and storage operations as described in this regulation. The installation is subject to the requirements for blowstills and asphalt storage tanks. This regulation requires the installation to keep records for two years. In the permit condition, this was changed to five years to comply with the record keeping requirements of 10 CSR 10-6.065, *Operating Permits*. The asphalt tank heaters are not subject to this regulation; they have single, separate stacks from the asphalt tanks and only emit products of natural gas combustion.

For the direct fired thermal oxidizer (EP DFTO-101), the installation performed testing in June 2010. The testing was conducted at a production rate of 74.29 tons per hour. Results indicated an average PM emission rate of 0.04 pounds per ton, and a maximum observed opacity of zero percent. The testing scenario included the simultaneous operation of two blowstills along with all seven storage tanks.

Testing for DFTO-102 occurred in November 2015. See Subpart AAAAAAA for additional information. For all units subject to an opacity limitation in this permit, there is a summary table located in Appendix: Opacity Limitations.

**40 CFR Part 60 Subpart IIII, Stationary Compression Ignition Internal Combustion Engines**

This regulation applies to new stationary internal combustion engines located at both area and major sources of HAP emissions. This regulation does not apply to the installation, as the emergency engines are spark ignition engines.

**40 CFR Part 60 Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines**

This regulation applies to new stationary internal combustion engines located at both area and major sources of HAP emissions. The installation does not have a financial agreement with another entity, and does not operate under the provisions of §60.4211(f)(3)(i), therefore those provisions do not appear in this permit. The installation uses the 50 hours for preventative maintenance activities only.

**Maximum Achievable Control Technology (MACT) Applicability**

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

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart. The parts washers do not use any of the solvents listed above, therefore this regulation does not apply.

**40 CFR Part 63 Subpart HHHH National Emission Standards for Hazardous Air Pollutants For Wet Formed Fiberglass Mat Production**

This regulation applies to this production process which is located at a major source of HAPs. This installation is not a major source of HAPs; therefore this regulation does not apply.

**40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

This regulation applies to existing stationary internal combustion engines located at both area and major sources of HAP emissions. The emergency engines were constructed after June 12, 2006 and therefore meet the definition of a new engine. As a new spark ignition stationary engine, these units are subject to 40 CFR part 60 Subpart IIII.

**40 CFR part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters**

The provisions of this subpart apply to various industrial, commercial, or institutional boiler or process heaters located at major sources of HAPs. This installation is an area source of HAPs, therefore this regulation does not apply.

**40 CFR Part 63 Subpart LLLLLL, National Emission Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing**

This regulation applies to asphalt processing facilities or asphalt roofing manufacturing facilities, as defined in §63.8698, that is a major source of HAP emissions. This installation is not a major source of HAPs; therefore this regulation does not apply

**40 CFR Part 63 Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities**

The provisions of this subpart apply to gasoline dispensing facilities located at an area source of HAPs. This regulation applies to the gasoline storage tank and appears in the operating permit as Permit Condition Subpart CCCCCC.

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

The provisions of this subpart apply to various industrial, commercial, and institutional boilers located at an area source of HAPs. Both boilers (EP-07 and EP-08) combust only natural gas and are not subject to this regulation per the provisions of §63.11195(e). Therefore, this regulation does not apply.

**40 CFR part 63 Subpart AAAAAAA, National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing**

Applicability:

The provisions of this subpart apply to asphalt processing operation and/or asphalt roofing manufacturing operation located at area sources of HAPs. This installation meets the definition of asphalt processing, and the blowstills are subject to this regulation. The blowstills were all constructed prior to July 9, 2009, therefore they are considered existing sources.

Delegation:

Although Missouri has incorporated Subpart AAAAAAA into state regulation 10 CSR 10-6.075, the state has not accepted delegation. Therefore compliance management is addressed through the Administrator. The permittee must submit all compliance reports to the Administrator, and send copies to the Air Pollution Control Program.

As an existing source, TAMKO must demonstrate compliance no later than 180 calendar days after December 2, 2010. On February 17, 2011, TAMKO submitted the Notification of Compliance Status to EPA Region 7. According to the provisions of §63.11564(a)(6), the permittee may use data from a previously conducted emissions test to serve as documentation of compliance. The permittee utilized this option, citing a June 22-29, 2010 performance test conducted on the Large and Small DFTO units (DFTO-101 and EP 3-02).

In 2015, TAMKO replaced the Small DFTO (EP 3-02) with another DFTO that has a larger burner size (8.37 MMBtu/hr vs. 25 MMBtu/hr). TAMKO conducted compliance testing for Subpart AAAAAAA and NSPS UU for the new DFTO (DFTO-102) on November 16-20, 2015. Testing was conducted at an average production rate of 109.53 tons/hour. For the three runs, the average PM emissions were 0.035 lbs/ton asphalt charged to the blowing stills, as measured using the front-half of Method 5A. Visible emission readings were also performed during the three runs, with an average opacity of 0%. Subpart AAAAAAA requires the installation to establish a minimum operating temperature. The 3-hour average

temperature of the test was 1428 °F for DFTO-102. For all units subject to an opacity limitation in this permit, there is a summary table located in Appendix: Opacity Limitations.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

**40 CFR Part 61 Subpart M, National Emission Standard for Asbestos**

This regulation applies to the installation and appears in the Core Permit Requirements section of the Operating Permit.

**Compliance Assurance Monitoring (CAM) Applicability**

The CAM regulation exempts units for which an emission limitation or standard for which the Part 70 operating permit specifies a continuous compliance demonstration method. [see §64.2(b)(1)(vi)]. This operating permit specifies continuous compliance demonstration methods for all control devices used to demonstrate compliance with applicable regulations. Therefore CAM does not apply.

**Greenhouse Gas Emissions**

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO<sub>2</sub> emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO<sub>2</sub> emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

**Other Regulatory Determinations**

**10 CSR 10-6.065, Operating Permits**

In the application, the installation requested a voluntary limitation of 10 tons/year formaldehyde on a plant wide basis, to ensure area source status. However, after the issuance of construction permit 052015-004, this limitation is no longer necessary. This construction permit imposes a 2 ton/year formaldehyde limit on the honeycomb dryer. Other sources of formaldehyde emissions are the natural gas combustion units. The installation now has conditioned potential emissions much less than 10 tons/year of formaldehyde, therefore the voluntary limitation is no longer necessary to maintain area source status.

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

This regulation applies to all sources of visible emissions with specific exemptions. Units not listed are not expected to emit opacity. The applicability of this regulation to the remaining units is detailed in the table below. For all units subject to an opacity limitation in this permit, there is a summary table located in Appendix: Opacity Limitations.

**Table 6: 10 CSR 10-6.220 Applicability**

EP #	Unit Description	6.220 Applicability
<b>Boiler Operations</b>		
EP-07	Boiler #7, 25.2 MMBtu/hr, natural gas fired	Meets exemption (1)(L) as a natural gas fired unit.
EP-08	Boiler #8, 25.2 MMBtu/hr, natural gas fired	Meets exemption (1)(L) as a natural gas fired unit.

<b>Refinery Operations</b>		
EP BS-AB1-A	Asphalt Blow Still #37, MHDR= 1 ton/hr, Mfr: Nueces Model: B5-15, Installed 1990	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP BS-AB1-B	Asphalt Blow Still #36, MHDR= 1 ton/hr, Mfr: General Machinery, Installed 1990	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP BS-AB2-A	Asphalt Blow Still #35, MHDR= 1 ton/hr, Mfr: General Steel Model: 933918, Installed 1993	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP BS-AB2-B	Asphalt Blow Still #34, MHDR= 1 ton/hr, Mfr: General Steel Model: 893918, Installed 1993	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP 3-08	Asphalt Storage Tank #1 Heater, MHDR= 0.8 MMBtu/hr, combusts natural gas, Mfr: Maxon, Series 67 Tube-O-Flame, Installed 2010	Meets exemption (1)(L) as natural gas fired units
EP 3-08A	Asphalt Storage Tank #1, 23,000 gallon capacity, Mfr: General Steel Model: 876503-1, Installed 1989	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP 3-09	Asphalt Storage Tank #2 Heater, MHDR= 0.8 MMBtu/hr, combusts natural gas, Mfr: Maxon, Series 67 Tube-O-Flame, Installed 2010	Meets exemption (1)(L) as natural gas fired units
EP 3-09A	Asphalt Storage Tank #2, 23,000 gallon capacity, Mfr: General Steel Model: 876503-2, Installed 1989	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP 3-30	Asphalt Storage Tank #3 Heater, MHDR= 5 MMBtu/hr, combusts natural gas, Mfr: Eclipse, ThermJet/TJ500MATN-ZX, Installed 2000	Meets exemption (1)(L) as natural gas fired units
EP 3-30A	Asphalt Storage Tank #3, 39,250 gallon capacity, Mfr: General Steel Model: 002238-1, Installed 2000	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP 3-40	Asphalt Storage Tank #4 Heater, MHDR= 5 MMBtu/hr, combusts natural gas, Mfr: Eclipse, ThermJet/TJ500MATN-ZX, Installed 2000	Meets exemption (1)(L) as natural gas fired units
EP 3-40A	Asphalt Storage Tank #4, 39,250 gallon capacity, Mfr: General Steel Model: 002238-2, Installed 2000	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP 3-05	Asphalt Storage Tank #7 Heater, MHDR= 6.052 MMBtu/hr, combusts natural gas, Mfr: Power Flame Model: C4-G-30, Installed 2014	Meets exemption (1)(L) as natural gas fired units

EP 3-05A	Asphalt Storage Tank #7, 189,000 gallon capacity, Mfr: General Steel Model: 831063-1, Installed 1990	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP 3-06	Asphalt Storage Tank #8, 169,000 gallon capacity, Mfr: General Steel Model: 831063-2, Installed 1989	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
EP 3-07	Asphalt Storage Tank #9, 189,000 gallon capacity, Mfr: General Steel Model: 893506, Installed 1990	Meets exemption (1)(H), opacity is regulated under 10 CSR 10-6.070, 40 CFR part 60 Subpart UU
	Space Heaters	Meets exemption (1)(L) as natural gas fired units
	Hand Torches	Meets exemption (1)(L) as natural gas fired units
	Emergency Generators	Meets exemption (1)(A) as internal combustion engines
<b>Fiberglass Mat Manufacturing Operations</b>		
EP 2-9A	RTO on Honeycomb Dryer	Meets exemption (1)(L) as natural gas fired unit.
EP 2-9B	Fiberglass Trim Chop System	Meets exemption (1)(O) as only vents indoors.
<b>Felt Mill Operations</b>		
EP 1-2	Felt Mill #1 Sawdust Holding Tank	Regulation applies, see Permit Condition 6.220
EP A-2	Felt Mill #2 Sawdust Holding Tank	Regulation applies, see Permit Condition 6.220
	Sawdust Unload Station	Regulation applies, see Permit Condition 6.220
	Space Heaters	Meets exemption (1)(L) as natural gas fired unit.

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

This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri’s State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP, therefore it must appear in this Operating Permit. All combustion units on site combust natural gas and meet exemption (1)(A)2., therefore this regulation does not apply.

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

This regulation applies to all sources of sulfur dioxide with specific exemptions. All combustion units on site combust natural gas and meet exemption (1)(A), therefore this regulation does not apply.

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

This regulation applies to all sources of particulate matter with specific exemptions. Units that are not listed are not expected to emit particulate matter. Combustion units are fueled with either natural gas or fuel oil, neither of which meet the definition of process weight. The applicability of the remaining units is detailed in the following table.

**Table 7: 10 CSR 10-6.400 Applicability**

Emission Point #	Unit Description	6.400 Applicability
<b>Refinery Operations</b>		
EP BS-AB1-A	Asphalt Blow Still #37, MHDR= 1 ton/hr, Mfr: Nueces Model: B5-15, Installed 1990	Exempt per (1)(C), subject to more stringent PM limit in 10 CSR 10-6.070, 40 CFR part 60 Subpart UU. MHDR= 17.5 ton/hr via 2015 testing, 6.400 limit= 27.9 lb PM/hr, Subpart UU limit=1.3 lb PM/hr.
EP BS-AB1-B	Asphalt Blow Still #36, MHDR= 1 ton/hr, Mfr: General Machinery, Installed 1990	Exempt per (1)(C), subject to more stringent PM limit in 10 CSR 10-6.070, 40 CFR part 60 Subpart UU. MHDR= 17.5 ton/hr via 2015 testing, 6.400 limit= 27.9 lb PM/hr, Subpart UU limit=1.3 lb PM/hr.
EP BS-AB2-A	Asphalt Blow Still #35, MHDR= 1 ton/hr, Mfr: General Steel Model: 933918, Installed 1993	Exempt per (1)(C), subject to more stringent PM limit in 10 CSR 10-6.070, 40 CFR part 60 Subpart UU. MHDR= 17.5 ton/hr via 2015 testing, 6.400 limit= 27.9 lb PM/hr, Subpart UU limit=1.3 lb PM/hr.
EP BS-AB2-B	Asphalt Blow Still #34, MHDR= 1 ton/hr, Mfr: General Steel Model: 893918, Installed 1993	Exempt per (1)(C), subject to more stringent PM limit in 10 CSR 10-6.070, 40 CFR part 60 Subpart UU. MHDR= 17.5 ton/hr via 2015 testing, 6.400 limit= 27.9 lb PM/hr, Subpart UU limit=1.3 lb PM/hr.
<b>Fiberglass Mat Manufacturing Operations</b>		
EP 2-9B	Fiberglass Trim Chop System	Meets exemption (1)(B)15., control system is federally required and has overall control efficiency of at least 90%.
EP 2-6A	Delta Former Vacuum-White Water System	Meets exemption (1)(B)12., uncontrolled PTE is less than 0.5 lb/hr
EP 2-6B	Dandy Roll Vacuum	Meets exemption (1)(B)12., uncontrolled PTE is less than 0.5 lb/hr
<b>Felt Mill Operations</b>		
EP 1-2	Felt Mill #1 Sawdust Holding Tank	Meets exemption (1)(B)16., uncontrolled potential emissions less than the limitation. See table below.
EP A-2	Felt Mill #2 Sawdust Holding Tank	Meets exemption (1)(B)16., uncontrolled potential emissions less than the limitation. See table below.
	Sawdust Unload Station	Meets exemption (1)(B)16., uncontrolled potential emissions less than the limitation. See table below.

**Table 8: Uncontrolled Potential Emission Calculations, Felt Mill Operations**

Emission Point #	Unit Description	MHDR (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor Reference	Potential Uncontrolled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EP 1-2	Felt Mill #1 Sawdust Holding Tank	0.742	2	WebFIRE, SCC 30703002	1.48	3.36
EP A-2	Felt Mill #2 Sawdust Holding Tank	0.742	2	WebFIRE, SCC 30703002	1.48	3.36
	Sawdust Unload Station	0.742	2	WebFIRE, SCC 30703002	1.48	3.36

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

This regulation applies to all sources of particulate matter from indirect heating units with specific exemptions. All of the indirect heating sources combust solely natural gas, therefore the installation meets exemption (1)(E) and this regulation does not apply.

**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).

**Appendix: Opacity Limitations**

This section provides a summary table for all emission units subject to any opacity requirement.

**Table 9: Summary of Opacity Requirements**

EP #	Description	Control Device	Opacity Limitation	Compliance Methods	Reporting
<b>Refinery Operations</b>					
EP BS-AB1-A	Asphalt Blow Still #37, MHDR= 17.5 ton/hr, Mfr: Nueces Model: B5-15, Installed 1990	EP DFTO-101: Direct Fired Thermal Oxidizer, MHDR= 18 MMBtu/hr, combusts natural gas, Mfr: Zeeco, Installed 2001; And EP DFTO-102: Direct Fired Thermal Oxidizer, MHDR = 25 MMBtu/hr, combusts natural gas, Mfr: John Zink Model:DBY-O,	0% <sup>25</sup>	Method 22 for six minutes; and/or Method 9 for thirty minutes, on the schedule detailed in Permit Condition 6.220. If opacity greater than the limit is observed prior to the end of the prescribed time period, an exceedance is confirmed and the time period may close.	Within 30 days of observation of any visible emissions by either Method 22 or Method 9. Include in ACC and SAM reports.
EP BS-AB1-B	Asphalt Blow Still #36, MHDR= 17.5 ton/hr, Mfr: General Machinery, Installed 1990		0%		
EP BS-AB2-A	Asphalt Blow Still #35, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 933918, Installed 1993		0%		
EP BS-AB2-B	Asphalt Blow Still #34, MHDR= 17.5 ton/hr, Mfr: General Steel Model: 893918, Installed 1993		0%		
EP 3-08A	Asphalt Storage Tank #1, 23,000 gallon capacity, Mfr: General Steel Model: 876503-1, Installed 1989		0%		
EP 3-09A	Asphalt Storage Tank #2, 23,000 gallon capacity, Mfr: General Steel Model: 876503-2, Installed 1989		0%		
EP 3-30A	Asphalt Storage Tank #3, 39,250 gallon capacity, Mfr: General Steel Model: 002238-1, Installed 2000		0%		
EP 3-40A	Asphalt Storage Tank #4, 39,250 gallon capacity, Mfr: General Steel Model: 002238-2, Installed 2000		0%		

<sup>25</sup> As stated in Permit Condition NSPS UU. The asphalt storage tanks have an exception to the limit for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period.

EP #	Description	Control Device	Opacity Limitation	Compliance Methods	Reporting
EP 3-05A	Asphalt Storage Tank #7, 189,000 gallon capacity, Mfr: General Steel Model: 831063-1, Installed 1990	Installed June 2015	0%		
EP 3-06	Asphalt Storage Tank #8, 169,000 gallon capacity, Mfr: General Steel Model: 831063-2, Installed 1989		0%		
EP 3-07	Asphalt Storage Tank #9, 189,000 gallon capacity, Mfr: General Steel Model: 893506, Installed 1990		0%		
<b>Felt Mill Operations</b>					
EP 1-2	Felt Mill No. 1 Sawdust Holding tank, Installed 1967	Wheelabrator #86 Model 36 WCC Dust Collector	40%	Method 22 for six minutes; and/or Method 9 for thirty minutes, on the schedule detailed in Permit Condition 6.220	Within 30 days of observation of exceedances of the limit. Include in ACC and SAM reports.
EP A-2	Felt Mill No. 2 Sawdust Holding tank, Installed 1967		40%		
	Sawdust Unload Station, installed after 1971		20%		

## Response to Public Comments

The draft Part 70 Operating Permit for TAMKO Building Products, Inc. was placed on public notice August 31, 2018 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <https://dnr.mo.gov/env/apcp/permit-public-notices.htm>. . A public comment was received from Mr. Dan Hollingshead of TAMKO. The comment is addressed below:

**Comment #1:** Please make the following changes regarding 10 CSR 10-6.220:  
EP 2-9B is located entirely within a building and does not vent outside.  
EP 2-12 does not exist, it was never installed.

**Response to Comment #1:** The permit has been changed to incorporate this comment. These units have been removed from Permit Condition 6.220 with an explanation added to the Statement of Basis EP 2-9B meets exemption 6.220(1)(O) and EP 2-12 was never installed.