

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: OP2018-048
Expiration Date: AUG 06 2023
Installation ID: 077-0004
Project Number: 2016-05-006

Installation Name and Address

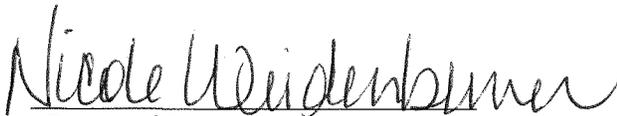
Timken SMO LLC
 2601 West Battlefield Road
 Springfield, MO 65807
 Greene County

Parent Company's Name and Address

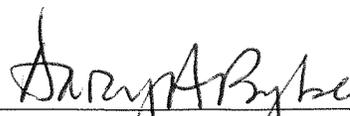
Timken SMO LLC
 2601 West Battlefield Road
 Springfield MO, 65807

Installation Description:

Timken SMO LLC is a rubber processing and rubber products manufacturing installation located in Springfield, Missouri. Rubber products produced include power transmission belts, automotive belts, and a variety of industrial belts. Rubber processing at the installation includes cutting, grinding, mixing, and coating operations. The installation is a major source of Nitrogen Oxides (NO_x), Particulate Matter ≤ Ten Microns (PM₁₀), Sulfur Oxides (SO_x), and Volatile Organic Compounds (VOCs). The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs).



Prepared by
 Nicole Weidenbenner, PE
 Operating Permit Unit



Director or Designee
 Department of Natural Resources

AUG 06 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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
7	Babcox & Wilcox Boiler
8	Norton & Timesaver Grinders
9	Keeler Boiler
10	Cleaver Brooks Boiler
11	Banbury Mixing
13	3C Cord Machine
20	Mill Mixing (2 Mills)
28	Polyrib Pirona Grinder
29	Raw Edge V-Band Stone Grinder
33	SM Form Grinder
37	Neoprene Hopper Vent
39	Emergency Generator
45	Fire Pump (West)
46	Fire Pump (East)
40	Railcar Unloading Carbon Black
41	Single Belt Grinders

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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
19	3C Cord Machine - Toluene Solvent Losses
21	Spreader Doctor Knife
22	Spreader Oven Operation
23	Dip Tank Fabric Spreader
24	Oven-Fabric Spreader
25	(2) Vertical Sag
26	(2) Vertical Profilers
27	Skiver, Grinder
35	R&D Banbury Mix, Mill Mix and Compounding
36	Plant Fugitives (excluding 3C Cord Machine)
38	Pre-Compound
6-F	300,000 gallon Fuel Oil #6 Fixed Roof North Storage Tank
7-F	285,000 gallon Fuel Oil #6 Fixed Roof South Storage Tank
T-1	10,000 gallon Toluene Fixed Roof Storage Tank
T-2	270 gallon Ethyl Acetate Totes
T-3	270 gallon Heptane Totes

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
T-5	(3) 500 gallon Diesel Storage Tanks
IEP-01	(3) 10,000 gallon Refined Oil Storage Tanks
IEP-02	Rebrand Area
IEP-03	Fabric Drying, Hot Rooms, Belt Branding, Creel Room, Belt Humidor Units
IEP-06	Chem Lab Test Area Propane Filling Station (3) Water Based Coatings Spray Booths (2) Grit Blasters

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. This section applies to regulations that apply on an entire-installation wide basis. The following general conditions apply to all units contained in this permit, unless stated otherwise.

Monitoring:

The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer's recommendations, or maintenance and operational history of similar units. All calibrations, maintenance, and operations shall occur according to good engineering practices. All manufacturing specifications and operational/maintenance histories shall be kept on site.

Recordkeeping:

1. The permittee shall record all required record keeping in an appropriate format.
2. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
3. The permittee shall keep a copy of this operating permit and review, copies of all issued construction permits and reviews, and copies of all Safety Data Sheets (SDS) on site.
4. All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Performance Testing:

When performance testing is required by a condition of this permit, one electronic copy of a written report of the performance test results shall be submitted to stacktesting@dnr.mo.gov within the timeframe required by the regulation that requires the testing. If no time frame is specified, the report shall be submitted within sixty days. The report shall 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.

Reporting:

1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.
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 and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802.

Permit Condition PW1

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

Emission Limitation:

1. The permittee shall emit less than ten tons of any individual HAP from the entire installation in any consecutive 12-month period.
2. The permittee shall emit less than 25 tons of combined HAPs from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

The permittee shall calculate the monthly and consecutive 12-month HAP emissions for each individual HAP and for total combined HAPs. The permittee shall use Attachments Individual HAP Emissions and Total HAP Emissions, or equivalents, to demonstrate compliance.

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.

Permit Condition MACT ZZZZ 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Unit	Description
39	Emergency generator, 250 HP, combusts diesel fuel, installed 1973
45	Fire Pump (West), 250 HP, combusts diesel fuel, installed 1967
46	Fire Pump (East), 250 HP, combusts diesel fuel, installed 1973

Operational Limitations:

1. The permittee shall comply with the following requirements: [§63.6603(a) and Table 2d to MACT ZZZZ]
 - a. For each emergency stationary CI RICE¹, the permittee must:
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first²;
 - ii. Inspect air cleaner every 1,000 of operation or annually, whichever comes first, and replace as necessary; and
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
2. The permittee must use diesel fuel that meets the following requirements, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. [§63.66.04(b) and 40 CFR 80.510(b)]
 - a. A maximum sulfur content of 15 ppm. [80.510(b)(1)(i)]
 - b. A minimum cetane index of 40; or a maximum aromatic content of 35 volume percent. [80.510(b)(2)(i) and (ii)]

¹ If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

² Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

General Compliance Requirements:

1. The permittee shall be in compliance with the management practices that apply at all times. [§63.6605(a)]
2. At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the director 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. [§63.6605(b)]

Monitoring, Operation, and Maintenance Requirements:

1. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
2. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
3. For each emergency CI RICE: The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to MACT ZZZZ. The oil analysis shall be performed at the same frequency specified for changing the oil in Table 2d to MACT ZZZZ. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within two business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(i)]

Continuous Compliance Requirements:

1. The permittee shall demonstrate continuous compliance as follows. [§63.6640(a) and Table 6 to MACT ZZZZ]
 - a. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - b. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2. The permittee must report each instance in which the permittee did not meet each operating limitation in Table 2d to this subpart that apply. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]

3. The permittee shall report each instance in which the permittee did not meet the requirements in Table 8 to MACT ZZZZ that apply. [§63.6640(e)]
4. The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under MACT ZZZZ, 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 §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under MACT ZZZZ and shall meet all requirements for non-emergency engines. [§63.6640(f)]
 - a. There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
 - b. The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(4) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
 - i. Emergency stationary RICE 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 RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - c. Emergency stationary RICE located at area sources of HAP 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 and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
 - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)]
 - A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
 - B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
 - C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
 - D. The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]

- E. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

General Provisions:

The permittee shall comply with §§63.1 through 63.15 as specified by Table 8 to MACT ZZZZ.

Recordkeeping and Reporting:

- 1. The permittee must submit each report in Table 7 of this subpart that applies. [§63.6650(a)]
 MACT ZZZZ, Table 7, Item 4:

For each ...	You must submit a ...	The report must contain ...	You must submit the report ...
4. Emergency stationary RICE that operate for the purposes specified in §63.6640(f)(4)(ii)	Report	a. The information in §63.6650(h)(1)	i. annually according to the requirements in §63.6650(h)(2)-(3).

- 2. Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the date in Table 7 of this subpart and according to the requirements in §63.6650(b)(1) through (b)(9). [§63.6650(b)]
 - a. For semiannual Compliance reports, the report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [§63.6650(b)(3)]
 - b. For semiannual Compliance reports, the report 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. [§63.6650(b)(4)]
 - c. For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A), the permittee may submit the subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in §63.6650(b)(1) through (b)(4). [§63.6650(b)(5)]
 - d. For annual Compliance reports, the report must cover the annual reporting period from January 1 through December 31. [§63.6650(b)(8)]
 - e. For annual Compliance reports, the report must be postmarked or delivered no later than January 31. [§63.6650(b)(9)]
- 3. The Compliance report must contain the information in §63.6650(c)(1) through (6). [§63.6650(c)]
 - a. Company name and address. [§63.6650(c)(1)]
 - b. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
 - c. Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
 - d. The compliance report must include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
 - e. If there are no deviations from any emission or operating limitations that apply, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]

4. For each deviation from an operating limitation that occurs, the Compliance report must contain the information in §63.6650(c)(1) through (4) and the information in §63.6650(d)(1) and (2).
[§63.6650(d)]
 - a. The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
 - b. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]
5. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [§63.6650(f)]
6. For engines that operate for the purpose specified in §63.6640(f)(4)(ii), the permittee must submit an annual report according to the requirements in §63.6650(h)(1) through (3). The permittee shall submit an annual report according to the requirements in §63.6650(h)(1) through (3). [§63.6650(h)]
 - a. The report shall contain the following information: [§63.6650(h)(1)]
 - i. Company name and address where the engine is located. [§63.6650(h)(1)(i)]
 - ii. Date of the report and beginning and ending dates of the reporting period. [§63.6650(h)(1)(ii)]
 - iii. Engine site rating and model year. [§63.6650(h)(1)(iii)]
 - iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§63.6650(h)(1)(iv)]
 - v. Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report shall also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§63.6650(h)(1)(vii)]
 - vi. If there were no deviations from the fuel requirements in §63.6604 that apply to the engine, a statement that there were no deviations from the fuel requirements during the reporting period. [§63.6650(h)(1)(viii)]
 - vii. If there were deviations from the fuel requirements in §63.6604 that apply to the engine, information on the number, duration, and cause of deviations, and the corrective action taken. [§63.6650(h)(1)(ix)]
 - b. Annual reports for each calendar year shall be submitted no later than March 31 of the following calendar year. [§63.6650(h)(2)]
 - c. The annual report shall be submitted 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). However, if the reporting form specific to MACT ZZZZ is not available in CEDRI at the time that the report is due, the written report shall be submitted to the Administrator at the appropriate address listed in §63.13. [§63.6650(h)(3)]
7. The permittee shall keep the records described in §63.6655(a)(2) through (a)(5). [§63.6655(a)]
 - a. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]

- b. Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
- c. Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
- d. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 8. The permittee shall keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each management practice that applies. [§63.6655(d)]
- 9. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to a maintenance plan. [§63.6655(e)]
- 10. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall 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. If the engine is used for the purposes specified in §63.6640(f)(4)(ii), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]
- 11. Records shall be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
- 12. As specified in §63.10(b)(1), the permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
- 13. The permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Permit Condition MACT JJJJJ				
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart JJJJJ – National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources				
Emission Unit	Description	Construction Date	MHDR (MMBtu/hr)	Fuels
9	Keeler Boiler	1969	45.2	Natural Gas, Residual Oil #6, and/or Waste Oil
10	Cleaver Brooks Boiler	1979	34	Natural Gas, Residual Oil #6, and/or Waste Oil

Operational Limitation:

To maintain the exemption in §63.11195(e), the permittee must continue to meet the definition of gas-fired boiler in this subpart. Gas-fired boiler means any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year. This hourly limitation applies per boiler. [§63.11195(e) and §63.11237]

Monitoring/Recordkeeping/Reporting:

1. The permittee shall monitor and record the hours and reason for fuel oil usage in each of the boilers on a monthly and calendar year basis. Attachment MACT JJJJJ, or an equivalent, shall be used to demonstrate compliance.
2. If the records indicate the exemption is no longer met, the permittee shall immediately comply will all applicable sections of this regulation and shall submit an Operating Permit modification request.

Permit Condition 6.260		
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds		
Emission Unit	Description	Construction Date
9	Keeler Boiler	1969
10	Cleaver Brooks Boiler	1979
39	Emergency generator, 250 HP, combusts diesel fuel	1973
45	Fire Pump (West), 250 HP, combusts diesel fuel, installed 1967	1967
46	Fire Pump (East), 250 HP, combusts diesel fuel, installed 1973	1973

Note: 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.

Emission Limitation:

1. For Emission Units 9 and 10, only when combusting fuel oil and/or waste oil: The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.
2. For Emission Units 39, 45, and 46: The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of these gases averaged on any consecutive three-hour time period.

Monitoring/Recordkeeping:

1. For Emission Units 9 and 10: The permittee shall keep records as required in Permit Condition 6.261.
2. For Emission Units 39, 45, and 46: The permittee shall keep records as required in Permit Condition MACT ZZZZ.

Permit Condition 6.261		
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions		
Emission Unit	Description	Construction Date

9	Keeler Boiler	1969
10	Cleaver Brooks Boiler	1979

Note: This is a state enforceable regulation.

Emission Limitation:

For Emission Units 9 and 10, only when combusting fuel oil and/or waste oil: The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.

Monitoring/Recordkeeping:

1. The permittee must demonstrate compliance using one of the following: [6.260(3)(E)3.A and B]
 - a. Fuel delivery records;
 - b. Fuel sampling and analysis
2. The permittee must: [6.261(4)(A)(1)-(4)]
 - a. Report any excess emissions other than startup, shutdown, and malfunction excess emissions already required to be reported under 10 CSR 6.050 to the staff director for each calendar quarter within thirty days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following:
 - i. Name and location of source;
 - ii. Name and telephone number of person responsible for the source;
 - iii. Identity and description of the equipment involved;
 - iv. Time and duration of the period of SO₂ excess emissions;
 - v. Type of activity;
 - vi. Estimate of the magnitude of the SO₂ excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
 - vii. Measures taken to mitigate the extent and duration of the SO₂ excess emissions; and
 - viii. Measures taken to remedy the situation which caused the SO₂ excess emissions and the measures taken or planned to prevent the recurrence of these situations.
 - b. Maintain a list of modifications to the source's operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess SO₂ emissions;
 - c. Maintain a records of data, calculations, results, records, and reports from fuel sampling tests; and
3. All required reports and records must be retained on-site for a minimum of five years and made available within five business days upon written or electronic request by the director. [6.261(4)(F)]
4. The permittee using fuel delivery records for compliance must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule: [§6.261(4)(C)1.-5.]
 - a. The name, address, and contact information of the fuel supplier;
 - b. The type of fuel
 - c. the sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur, and
 - d. the heating value of the fuel
5. The permittee using fuel sampling and analysis for compliance must also follow the requirements in subsection (5)(D) of this rule. [6.261(4)(D)]

6. The permittee using fuel sampling and analysis for compliance must conduct the sampling and analysis according to the provisions of 10 CSR 10-6.040. [6.261(5)(D)]

Permit Condition 1103-238D	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit 1103-238D, Issued November 24, 2003, Modified July 6, 2004	
Emission Unit	Description
41	Single Belt Grinders

Emission Limitation:

Special Condition 1: The permittee shall not discharge into the atmosphere from emission unit 41 Single Belt Grinders any PM₁₀ in excess of 15 tons in any consecutive 12-month period.

Monitoring/Recordkeeping:

Special Condition 2: The permittee shall record the monthly and consecutive 12 month PM₁₀ emission from this emission unit. The permittee shall use Attachment 1103-238D, or an equivalent, to demonstrate compliance.

Permit Condition 6.220			
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants			
Emission Unit	Description	Construction Date	Emission Limitation (% Opacity)
8	Norton & Timesaver Grinders	prior to 9/24/71	40
9	Keeler Boiler	1969	40
10	Cleaver Brooks Boilers	1979	40
13	3C Cord Machine	prior to 9/24/71	40
20	Mill Mixing (2 Mills)	prior to 9/24/71	40
28	Polyrib Pirona Grinder	prior to 9/24/71	40
29	Raw Edge V-Band Stone Grinder	prior to 9/24/71	40
33	SM Form Grinder	prior to 9/24/71	40
37	Neoprene Hopper Vent	prior to 9/24/71	40
40	Railcar Unloading Carbon Black	prior to 9/24/71	40
11	Banbury Mixing	1996	20
41	Single Belt Grinders	2003/2004	20

Emissions Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions greater than the limit shown in the table above for any continuous six minute period. [6.220(3)(A)1.]
2. Exceptions allowed in one continuous six minute period for each emission unit: The permittee may emit 60% opacity for one continuous six-minute period in any sixty minutes. [6.220(3)(A)2.]

Monitoring:

1. The permittee shall conduct visible emissions observations on each emission unit using USEPA Test Method 22 procedures. The permittee is only required to make observations when the emission unit

is operating and when the weather conditions allow. If the permittee observes no visible emissions, then a Method 9 observation is not required. For emission units with visible emissions, the source representative would then conduct a Method 9 observation.

2. The permittee must maintain the following monitoring schedule. Issuance of a renewal operating permit does not restart the schedule:
 - a. The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b. Should the permittee observe no violations of this regulation during this period then-
 - i. The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii. If a violation is noted, monitoring reverts to weekly.
 - iii. Should no violation of this regulation be observed during this period then-
 - A. The permittee may observe once per month.
 - B. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachments Method 22, Method 9 and Inspection Log (or equivalents), noting:

1. Whether any air emissions (except for water vapor) were visible from the emission units;
2. All emission units from which visible emissions occurred;
3. The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
4. The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

Permit Condition 6.400			
10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes			
Emission Unit	Description	Construction Date	Emission Limitation (lb PM/hr)
28	Polyrib Pirona Grinder	prior to 9/24/71	1.75
29	Raw Edge V-Band Stone Grinder	prior to 9/24/71	1.75
33	SM Form Grinder	prior to 9/24/71	1.30
41	Single Belt Grinders	2003/2004	0.97

Emission Limitations:

The permittee shall not emit particulate matter in excess of the limits in the table above.

Operational Limitations:

1. The permittee shall control emissions using the following control equipment for each emission unit. The control devices must be in use at all time the emission unit is in operation.

Emission Unit	Description	Control Device
28	Polyrib Pirona Grinder	CD-28 Cyclone
29	Raw Edge V-Band Stone Grinder	CD-29A Cyclone
33	SM Form Grinder	CD-33 Cyclone
41	Single Belt Grinders	CD-41A Cyclone

2. The cyclones shall be operated and maintained in accordance with manufacturer’s specifications.
3. The cyclones 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.

Monitoring/Recordkeeping:

1. The permittee shall keep a copy of the manufacturer’s specifications on site.
2. The permittee shall monitor and record the operating pressure drop across the cyclones at least once each operating day while the unit is operating. The operating pressure drop ranges shall be maintained within manufacturer’s recommendations.
3. The permittee shall maintain an operating and maintenance log for each control device. The permittee may use Attachment Inspection Log, or an equivalent form, to demonstrate compliance. The log(s) shall include the following:
 - a. Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Permit Condition 6.405					
10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating					
Emission Unit	Description	Construction Date	MHDR (MMBtu/hr)	Fuels	Emission Limitation (lb/MMBtu)
7	Babcox & Wilcox Boiler	1957	20.4	Natural Gas	0.40
9	Keeler Boiler	1969	45.2	Natural Gas, Residual Oil #6, and/or Waste Oil	0.40
10	Cleaver Brooks Boiler	1979	34	Natural Gas, Residual Oil #6, and/or Waste Oil	0.28
13	3C Cord Machine	1969	1.5	Natural Gas	0.40

Emission Limitation:

The permittee shall not emit particulate matter in excess of the limits specified above for each boiler.

Operational Limitation:

1. The permittee shall not combust waste oil containing an ash content greater than 0.93 weight percent in Emission Unit 9, Keeler Boiler.
2. The permittee shall not combust waste oil containing an ash content greater than 0.65 weight percent in Emission Unit 10, Cleaver Brooks Boiler.

Fuel Testing:

The permittee shall conduct fuel testing on the waste oil to quantify the ash content once per calendar year. If the waste oil testing demonstrates that either emission unit is not in compliance with their respective ash content limits, then the installation shall submit a compliance plan for approval by the director within 30 days of the testing.

Monitoring/Recordkeeping:

The permittee shall retain records of all fuel testing performed.

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 10-6.110 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 10-6.280 Compliance Monitoring Usage

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

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

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

V. General Permit Requirements

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

10 CSR 10-6.065(6)(C)1.B Permit Duration

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

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

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

1. Record Keeping
 - a. All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b. Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2. Reporting
 - a. All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or 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)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. 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, 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, 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 APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP 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 APCP 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, 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 Scott Rothrock, Plant Manager. On January 5, 2018, the Air Pollution Control Program was notified as Steve McDonald, Plant Manager is the current responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions

on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(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.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Timken SMO LLC is a rubber processing and rubber products manufacturing installation located in Springfield, Missouri. Rubber products include power transmission belts, automotive belts, and a variety of industrial belts. Rubber is mixed in Banbury mixers and formed into sheets. The cord is treated with toluene, coated with adhesive and then dried in ovens. Belts are constructed by layering rubber, fabric, and cord around a drum with a diameter equivalent to that desired in the final belt. The drum is then placed within a steam-heated pressure vessel to vulcanize the rubber. The belt is then removed from the drum, cut, shaped, and grooved according to specifications for the desired final belt.

Ownership History:

The installation was initially permitted in 1997 as Dayco Products. In 2003, ownership changed to Carlisle Transmission Products. In 2016, ownership transferred to the current owner, Timken SMO.

The installation is a major source of Nitrogen Oxides (NO_x), Particulate Matter ≤ Ten Microns (PM₁₀), Sulfur Oxides (SO_x), and Volatile Organic Compounds (VOCs). The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs).

Potential emissions are taken from Operating Permit OP2011-059. Boilers 9 and 10 are permitted to combust waste oil, natural gas, and residual oil. The potentials for these units were evaluated on the worst case by pollutant basis. The emergency generator potentials were based on 500 hours per year.

Table 1: Emissions Profile, tons per year

Pollutants	Reported Emissions					Potential Emissions
	2012	2013	2014	2015	2016	
Particulate Matter ≤ Ten Microns (PM ₁₀)	2.95	3.52	3.38	3.41	2.76	>100
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	2.33	2.24	2.53	2.55	2.12	80.99
Sulfur Oxides (SO _x)	0.13	0.06	0.13	3.87	0.22	>250
Nitrogen Oxides (NO _x)	8.43	9.79	9.99	10.59	8.72	>100
Volatile Organic Compounds (VOC)	51.52	65.37	61.62	49.97	136.35	>100
Carbon Monoxide (CO)	7.07	8.23	8.38	7.96	7.29	36.41
Hazardous Air Pollutants (HAPs)	0.14	0.17	0.15	0.24	0.22	<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 May 3, 2016, Revised June 1, 2016;
2. 2016 Emissions Inventory Questionnaire, received May 1, 2017;
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 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.

See Other Regulatory Determinations

Other Air Regulations Determined Not to Apply to the Operating Permit

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

See Other Regulatory Determinations

Construction Permit History

This installation has been issued the following construction permits:

1. Permit 1103-238D, Issued November 24, 2003
Modified Permit 1103-238D, Issued July 6, 2004
These permits are for the installation of four new belt grinders. The modified permit revises special condition #1 and contains all other special conditions and permit language, effectively superseding the initial permit issued in 2003. Special conditions 1 and 2 are incorporated into this operating permit as Permit Condition 1103-238D. The remaining two special conditions are duplicative of other applicable regulations and have not been included for permit streamlining. This construction permit does state there are two high efficiency cyclone dust collectors associated with this emission point. However, the permit does not contain a requirement to use these control devices. Therefore, these control devices are not federally required under the construction permitting regulations.
2. No Construction Permit Required Determination, Issued October 15, 2007:
This no construction permit required determination is for the installation of an additional dip tank to an existing oven in the 3C cord production line.
3. No Construction Permit Required Determination, Issued April 18, 2008:
This no construction permit required determination is for the installation of an additional oven and dip tank to the 3C Cord Machine.

The installation has received various other permits. However, these permits were not issued under the authority of 10 CSR 10-6.060, and are therefore not state or federally enforceable. These permits are enforceable by the Springfield Air Pollution Control Authority. Since these permits are not state or federally enforceable, they are not incorporated into this operating permit. A summary of these permits is presented below:

1. Permit 0798-196D, Issued July 14, 1998 for the Platten Press Belt Building Process
2. Permit 1096-190D, Issued October 28, 1996, Amended November 6, 1996, and superseded by Permit 1199-206D for the Banbury Body and screw mixers.
3. Permit 1096-189D, Issued October 6, 1999 for 2-42" Industrial Raw Edge Belt Building and Curing Line

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

Emission units 7, 9, and 10 all have capacities between 10 and 100 MMBtu/hr, however, they were all installed prior to June 19, 1984 and do not have capacities greater than 250 MMBtu/hr. Emission unit 13 was installed after June 19, 1984, however the unit has a capacity less than 10 MMBtu/hr. Therefore, this regulation does not apply to this installation.

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 installation has two storage tanks exceeding 40,000 gallons in capacity which hold fuel oil #6; however, fuel oil #6 is not a petroleum liquid as defined within §60.111(b) and §60.111a(b). These tanks also meet exemption §60.110b(b) with a maximum true vapor pressure less than 3.5 kPa. Therefore, this regulation does not apply to this installation.

40 CFR Part 60, Subpart BBB, Standards of Performance for the Rubber Tire Manufacturing Industry
This regulation applies to rubber tire manufacturing plants. [§60.540(a)] This installation does not produce tires, therefore this regulation does not apply.

40 CFR Part 60, Subpart DDD, Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry
This regulation applies to installations which manufacture the following polymers: polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate). [§60.560(a)] The installation does not manufacture any of the listed polymers, therefore this regulation does not apply.

40 CFR Part 60, Subpart VV, Standards of Performance for Polymeric Coating of Supporting Substrates Facilities
This regulation applies to each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. [§60.740(a)] The installation does not meet the definition of polymeric coating of supporting substrates within §60.741(a) as the installation does not contain a web coating process, therefore this regulation does not apply.

40 CFR Part 60, Subpart IIII , Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
This regulation applies to stationary CI RICE constructed, modified, or reconstructed after July 11, 2005. [§60.4200(a)(2) and (a)(3)] Emission unit 39 Emergency Generator was installed prior to this date and has not been modified or reconstructed since.

Maximum Achievable Control Technology (MACT) Applicability

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 JJJJJ, 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. Emission Unit 7 meets exemption 63.11195(e) as a unit that only combusts natural gas. Emission Units 7 and 9 will meet this same exemption as long as they meet the definition of gas fired boiler. The definition allows combustion of liquid fuel (including residual oil #6 and waste oil) under specific circumstances for up to 48 hours per year. A permit condition has been included in this operating permit for this conditional exemption.

40 CFR Part 60, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The provisions of this subpart apply to RICE units located at both area and major sources of HAP; for both existing and new units. All engines were installed prior to June 12, 2006 and therefore meet the definition of existing. All units are compression ignition (CI) engines. The provisions for existing emergency CI engines at area sources of HAPs appear in this operating permit as Permit Condition MACT ZZZZ.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M, National Emission Standards for Asbestos appears in Section IV. Core Permit Requirements.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

Emission units 28, 29, 33, and 41 all use control devices to demonstrate compliance with Permit Condition 6.400. However, uncontrolled emissions of these units are less than 100 tons/year. Therefore, these units do not meet the applicability of CAM and this regulation 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 CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ 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 CO₂ emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

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

The previous permit incorporated the provisions of Springfield City Code Article III, Section 2A-9, 9.5, and 10 in addition to this state regulation. Since this section of the City Code is not incorporated into Missouri's SIP, it is not state or federally enforceable. Therefore, it is not included in this operating permit.

Emission units 7 meets exemption (1)(L), as it only combusts natural gas. All the emergency engines and fire pumps meet exemption (1)(A) as internal combustion engines. Emission units 25, 26, 27, and 38 are not expected to emit visible emissions as the potential emissions are less than 0.5 lb PM/hr. Both sand blasting units and all three spray coating booths do not vent to the atmosphere and meet exemption (1)(O).

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.

Emission units 7 and 13 combust only natural gas and therefore meet exemption (1)(A)2. The remaining combustion units are subject to this regulation. The emergency generator and both fire pumps demonstrate compliance with 6.260 by complying with the applicable fuel sulfur requirement of 15 ppm in MACT ZZZZ. Calculations that demonstrate compliance using 0.0015% sulfur (15 ppm) are below:

$$\text{Distillate Oil SO}_2 \text{ emission factor (lbs / MMBtu)} = \frac{142(0.0015) \text{ lbs}/10^3 \text{ gal}}{140 \text{ MMBtu}/10^3 \text{ gal}} = 0.0015 \text{ lb/MMBtu}$$

(AP - 42 Table 1.3 - 1(9/98))

$$ppmv SO_2 = \left(\frac{0.0015 lb}{MMBtu} \right) \times \left(\frac{MMBtu}{10,320 wscf} \right) \times \left(\frac{ppmw}{1.660E^{-7} lb / scf} \right) \times \left(\frac{0.45 ppmv}{ppmw} \right) = 0.4 ppmv$$

(Appendix A – 7 to Part 60)

SO₃

$$Distillate Oil SO_3 \text{ emission factor (lbs / MMBtu)} = \frac{2(0.0015) \text{ lbs}/10^3 \text{ gal}}{140 \text{ MMBtu} / 10^3 \text{ gal}} = 0.00002 \text{ lb/MMBtu}$$

(AP - 42 Table 1.3 -1(9/98))

$$ppmv SO_3 = \left(\frac{0.00002 lb}{MMBtu} \right) \times \left(\frac{MMBtu}{10,320 wscf} \right) \times \left(\frac{1.602 \times 10^7 \text{ mg } ft^3}{lb m^3} \right) = 0.03 \frac{mg}{m^3}$$

(Appendix A – 7 to Part 60)

Emission units 9 and 10 are only subject to the regulation when combusting fuel oil and/or waste oil. When combusting natural gas, these units meet exemption (1)(A)2. Compliance with the emission limitations when combusting fuel oil and/or waste oil are shown below:

Emission Unit	Fuel	Emission Factor	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)
9	Residual Oil	985.8 lb/1000 gallons	6.57	8
	Waste Oil	911.4 lb/1000 gallons	6.08	
10	Residual Oil	777.51 lb/1000 gallons	5.18	
	Waste Oil	718.83 lb/1000 gallons	4.79	

The emission factor of 159S lb/1000 gallons was taken from AP-42 Table 1.3-1 for residual oil #6 under SCC 10200402 (157S lb SO₂/1000 gallons + 2S lb SO₃/1000 gallons), where S is the weight percent of sulfur in the oil. The average heating value of 150,000 Btu/gallon for residual oil was taken from AP-42 Appendix A. Emission unit 9 is in compliance with this regulation while burning residual oil that contains ≤ 6.2 percent sulfur. Emission unit 10 is in compliance with this regulation while burning residual oil that contains ≤ 4.89 percent sulfur.

The emission factor of 147S lb/1000 gallons was taken from AP-42 Table 1.11-2 for waste oil under SCC 10301302, where S is the weight percent of sulfur in the oil. The average heating value of 150,000 Btu/gallon for waste oil mixed with residual oil was taken from AP-42 Section 1.11.3. Emission unit 9 is in compliance with this regulation while burning residual oil that contains ≤ 6.2 percent sulfur. Emission unit 10 is in compliance with this regulation while burning residual oil that contains ≤ 4.89 percent sulfur. According to the document “Vermont Used Oil Analysis and Waste Oil Furnace Emissions Study”, from March 1996, the average sulfur content of the waste oil analyzed in the study was 0.36% by weight.

10 CSR 10-6.261 contains recordkeeping requirements to document the sulfur content of the fuel. These recordkeeping requirements are sufficient to also demonstrate compliance with the emission limitations of 10 CSR 10-6.260.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions

This regulation applies to any source that emits sulfur dioxide. Emission units 7 and 13 combust only natural gas and therefore meet exemption (1)(A). The emergency generator and both fire pumps are subject to a more stringent fuel sulfur content and therefore meet exemption (1)(C)2. Emission units 9 and 10 are only subject to the regulation when combusting fuel oil and/or waste oil. When combusting natural gas, these units meet exemption (1)(A)2. Compliance with the emission limitations when combusting fuel oil and/or waste oil are shown above for 10 CSR 10-6.260.

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

The previous permit incorporated the provisions of Springfield City Code Article III, Section 2A-20 and 23 in addition to this state regulation. Since this section of the City Code is not incorporated into Missouri's SIP, it is not state or federally enforceable. Therefore, it is not included in this operating permit. Units not listed in the following table are not expected to emit particulate matter, or do not meet the definition of process weight. Both sand blasting units meet exemption (1)(B)8. by meeting exemption 10 CSR 0-6.061(3)(B)6.C. All three spray coating booths are used to apply mold release. Two booths use hand sponge wiping application, while the third booth uses a spray gun applicator. Review of the SDS for the mold release indicates that particulates are not expected from this material.

Emission Unit	Description	Applicability
7	Babcox & Wilcox Boiler	Exempt per (1)(B)6
8	Norton & Timesaver Grinders	Exempt per (1)(B)16
9	Keeler Boiler	Exempt per (1)(B)6
10	Cleaver Brooks Boiler	Exempt per (1)(B)6
11	Banbury Mixing	Exempt per (1)(B)16
13	3C Cord Machine	Combustion emissions exempt per (1)(B)6, Process emission exempt per (1)(B)16.
20	Mill Mixing (2 Mills)	Exempt per (1)(B)16.
25	(2) Vertical Sag	Exempt per (1)(B)12
26	(2) Vertical Profilers	Exempt per (1)(B)12
27	Skiver, Grinder	Exempt per (1)(B)12
28	Polyrib Pirona Grinder	Applies, controls required
29	Raw Edge V-Band Stone Grinder	Applies, controls required
33	SM Form Grinder	Applies, controls required
37	Neoprene Hopper Vent	Exempt per (1)(B)16.
38	Pre-Compound	Exempt per (1)(B)12
40	Railcar Unloading Carbon Black	Exempt per (1)(B)16
41	Single Belt Grinders	Applies, controls required

For units that meet exemption (1)(B)16, the uncontrolled potentials are shown in the table below:

Emission Unit	P (ton/hr)	PM Emission Factor (lb/ton)	Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)
8	1.3149	1.782	2.34	4.93

Emission Unit	P (ton/hr)	PM Emission Factor (lb/ton)	Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)
11	5.778	1.85	10.69	13.28
13	0.639	1.738	1.11	3.04
20	0.873	0.9844	0.86	3.74
37	2.0	0.46	0.92	6.52
40	10.417	0.06	0.63	19.71

The compliance demonstration for units which are subject to the regulation and a control device is required is shown in the following table:

Emission Unit	Control Device	Total Efficiency (Capture & Control)	Controlled Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)
28	CD-28 Cyclone	79.2	1.58	1.75
29	CD-29A Cyclone	79.2	1.58	1.75
33	CD-33 Cyclone	79.2	1.01	1.30
41	CD-41A Cyclone	79.2	0.35	0.97

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

The previous permit incorporated the provisions of Springfield City Code Article III, Section 2A-15 in addition to this state regulation. Since this section of the City Code is not incorporated into Missouri's SIP, it is not state or federally enforceable. Therefore, it is not included in this operating permit. This state regulation appears in the permit as Permit Condition 6.405. The installation's Total Heat Input (Q) is calculated below according to the provisions of 6.405(3)(B), (3)(D) and (3)(E).

Emission Unit	Description	MHDR (MMBtu/hr)
7	Babcox & Wilcox Boiler	20.4
9	Keeler Boiler	45.2
10	Cleaver Brooks Boiler	34
13	3C Cord Machine – Combustion Emissions	1.5
Total Q		101.1

The maximum allowable PM emission limitation for existing (installed prior to 9/24/71) indirect heating sources at an installation located in the Springfield-Greene County area having a total heat input capacity between 10 MMBtu and 10,000 MMBtu:

$$E = 0.90 * 101.1^{-0.174} = 0.40 \frac{lb}{MMBtu}$$

The maximum allowable PM emission limitation for new (installed after 9/24/71) indirect heating sources at an installation located in the Springfield-Greene County area having a total heat input capacity between 10 MMBtu and 2,000 MMBtu:

$$E = 1.31 * 101.1^{-0.338} = 0.28 \frac{lb}{MMBtu}$$

For the units that combust only natural gas (EP 7 and 13B), they are deemed in compliance with the regulation by 6.405(1)(C). Therefore, no monitoring or recordkeeping is required.

For the units that combust natural gas, residual oil #6, and waste oil (EP 9 and 10), they are deemed in compliance by 6.405(1)(C) when combusting natural gas and residual oil #6. When combusting these two fuel types, no monitoring and recordkeeping is required. However, when these units combust waste oil, compliance is demonstrated by testing of the ash content of the waste oil to ensure it is less than the maximum value as calculated below.

AP42, Table 1.11-1, SCC 10301302, provides a PM emission factor of 64A lb/1000 gallons, with A representing the weight percent ash in the fuel. The average heating value of 150,000 Btu/gallon for waste oil mixed with residual oil was taken from the same AP42 section.

Emission Unit	Description	Emission Limit (lb/MMBtu)	Maximum ash content of waste oil for compliance (weight %)
9	Keeler Boiler	0.40	0.93
10	Cleaver Brooks Boiler	0.28	0.65

Emission Unit changes from last Operating Permit

1. The installation has indicated the following units have been removed:

EU 30	Small Raw Edge Spray Booth
EU 31	Small Raw Edge Spray Booth
EU 32	Small Raw Edge Spray Booth
EU 20	Mix Mill 1 (Mix Mills 2 and 3 are still on site)

2. The installation has indicated the following units should be added to the permit:

EU-46	Fire Pump (East)
EU-45	Fire Pump (West)

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 APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft Part 70 Operating Permit for Timken SMO LLC was placed on public notice March 16, 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-notice.htm> . Public comments were received from Mr. Mark Smith, EPA Region 7. The comments are addressed in the order in which they appear within the letter(s).

Comment #1: First, Monitoring Requirement 1., in Permit Condition 6.220, requires the permittee to conduct visible emissions observations on Emission Units 8, 9, 10, 13, 20, 28, 29, 33, 37 40, 11, and 41, using USEPA Test Method 22 *like procedures* (emphasis added). In the introduction to EPA Method 22, EPA indicates minor changes in the test methods should not necessarily affect the validity of the results and it is recognized that alternative and equivalent methods exist. §60.8 provides authority for the Administrator to specify or approve (1) equivalent methods, (2) alternative methods, and (3) minor changes in the methodology of the test methods. An owner employing such methods or deviations from the test methods without obtaining prior approval does so at the risk of subsequent disapproval and retesting with approved methods. If MoDNR is authorizing the use of a modified Test Method 22, the modified test method should receive formal review and approval, by the Administrator, and the approved alternate test method should be attached to the issued operating permit.

Response to Comment #1: In Permit Condition 6.220, the reference to Method 22 like procedures has been changed to Method 22.

Comment #2: Second, Permit Condition 6.405 establishes an operational limitation on the waste oil ash content combusted in EU 9 of 0.93 weight percent; and a waste oil ash content combusted in EU 10 of 0.65 weight percent. Permit Condition 6.405 also requires the permittee to conduct fuel testing on the waste oil, to quantify the ash content once every five years. With waste oil ash content being a critical value for verifying compliance, MoDNR may want to consider a fuel testing frequency of less than once every five years.

Response to Comment #2: The testing frequency has been changed to yearly.

Comment #3: Third, Attachment 1103-238D is the PM₁₀ compliance testing record the permittee shall use, as required by Permit Condition 1103-238D. Attachment 1103-238D indicates the permittee should use "emission factor derived from mass balance." To enhance the practical enforceability, MoDNR might consider showing the "mass balance" used to develop the emission factor, including an appropriate example.

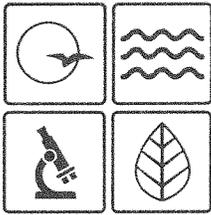
Response to Comment #3: Permit 1103-238D established an emission factor of 14.47 lbs of PM₁₀ per ton. This was calculated using a mass balance approach taking into account a 79.2% overall control efficiency.

Comment #4: Fourth, the draft Part 70 Operating Permit for Timken-Springfield, is a renewal based on an Application for Authority to Operate received by MoDNR on May 3, 2016 and revised June 1, 2016. The current Part 70 Operating Permit was issued December 1, 2011 to Carlisle Transportation Products, Inc. To maintain permit continuity, EPA suggests MoDNR consider providing an ownership history, for this installation, in the Installation Description in the Statement of Basis.

Response to Comment #4: An ownership history section has been added to the Statement of Basis to maintain permit continuity.

Comment #5: Finally, in the Other Regulatory Determinations section of the Statement of Basis for 10 CSR 10-6.400, MoDNR states "Units not listed in the following table are not expected to emit particulate matter, or do not meet the definition of process weight." EPA is concerned that it may not be clear to reviewers of the permit which "units are not listed in the table" (emphasis added). MoDNR may want to consider providing additional clarity regarding the units not expected to emit particulate matter.

Response to Comment #5: The emission units not specifically listed in the table or detailed in the introductory paragraph of 10-6.400 are the emergency generator, the two fire pumps, and the various volatile organic compound (VOC) sources listed in the Emission Units Without Limitations section. The emergency generator and two fire pumps do not meet the definition of process weight, as the particulate emissions result from the combustion of liquid fuels. The various VOC sources (tanks, spreaders, and other fugitive sources) are not expected to emit particulate matter.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

AUG 06 2018

Mr. Steve McDonald
Timken SMO LLC
2601 West Battlefield Road
Springfield, MO 65807

Re: Timken SMO LLC, 077-0004
Permit Number: OP2018-048

Dear Mr. McDonald:

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: 2016-05-006



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