



Missouri Department of Natural Resources  
Air Pollution Control Program

## INTERMEDIATE STATE PERMIT TO OPERATE

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

**Intermediate Operating Permit Number:** OP2012-036  
**Expiration Date:** SEP 10 2017  
**Installation ID:** 099-0011  
**Project Number:** 2011-05-030

**Installation Name and Address**

Union Pacific Railroad Company – DeSoto Car Shop  
491 N. Main  
DeSoto, MO 63020  
Jefferson County

**Parent Company's Name and Address**

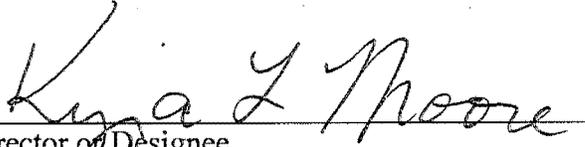
Union Pacific Railroad Company  
491 N. Main  
DeSoto, MO 63020

**Installation Description:**

Union Pacific Railroad Company - De Soto Car Shop operates a railroad car repair and painting facility in De Soto, Missouri. The installation consists of painting operations, drying ovens, shot blast-cleaning operations, and parts washing. The installation is a synthetic minor source of Volatile Organic Compounds (VOCs), and Hazardous Air Pollutants (HAPs) and a minor source of particulate matter less than ten microns in diameter (PM<sub>10</sub>).

SEP 11 2012

Effective Date

  
Director or Designee

Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Union Pacific Railroad Company - De Soto Car Shop operates a railroad car repair and painting facility in De Soto Missouri. The installation consists of painting operations, drying ovens, shot blast-cleaning operations, and parts washing. The installation has the potential to emit volatile organic compounds (VOC) and hazardous air pollutants (HAP) above the Title V major threshold levels. The facility has taken voluntary limits for those pollutants and is considered a synthetic minor. The facility is a minor source for PM<sub>10</sub> with emission controls in operation and working properly, as required in this permit.

<b>Reported Air Pollutant Emissions, tons per year</b>					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	3.05	0.39	2.47	1.59	3.05
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	2.68	0.39	2.18	1.48	2.52
Sulfur Oxides (SO <sub>x</sub> )	0.01	0.00	0.01	0.01	0.01
Nitrogen Oxides (NO <sub>x</sub> )	1.55	0.00	1.60	1.62	1.77
Volatile Organic Compounds(VOC)	11.27	21.53	19.61	2.11	17.21
Carbon Monoxide (CO)	1.10	0.00	1.15	1.14	1.27
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	14.76	4.50	2.20	2.43	0.34
Ammonia (NH <sub>3</sub> )	0.00	0.00	0.00	0.00	0.00

### EMISSION UNITS WITH LIMITATIONS

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

2010 EIQ Reference	Unit Description
EP-4	Shot Blast #1
EP-6	Shot Blast #2
EP-15	Shot Blast #3
EP-7	Old Painting Booth
EP-9	Drying Oven
EP-8	Old Swab Painting
EP-20	New Swab Painting
EP-10	Old Stencil Position
EP-11	New Paint Booth
EP-12	New Drying Oven
EP-13	New Stencil Position
EP-17	North End Paint Booth
EP-19	120-Gallon Parts Washer
EP-19	5-Gallon Parts Washer

**EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS**

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

<u>Description of Emission Source</u>	<u>2010 EIQ Reference</u>
Black Smith Forge (natural gas, 2.9 MMBtu/hr)	EP-1
1000-gallon Diesel Fuel Storage Tank	EP-2
Unpaved Road (fugitive)	EP-5
Space Heaters (natural gas, individual units < 10 MMBtu)	EP-14
New Space Heaters (natural gas, individual units < 10 MMBtu)	EP-16
Welding (fugitive)	EP-18
Wood Mill/Maintenance Shop	EP-21
350-gallon Gasoline Storage Tank	EP-22
350-gallon Waste Oil Storage Tank	EP-23
275-gallon Waste Oil Storage Tank	EP-24
275-gallon Kerosene Storage Tank	EP-25

## II. Plant Wide Emission Limitations

10 CSR 10-6.065(5) includes provisions for an Intermediate Operating Permit for “Major Sources” that choose to volunteer for self-imposed emission limitations so that a Part 70 permit is not required. The emission limitations apply to the entire facility and are federally enforceable. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

### PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

#### Emission Limitations:

- 1) The permittee shall emit less than ten tons of any single Hazardous Air Pollutant (HAP) in any consecutive 12-month period.
- 2) The permittee shall emit less than 25 tons of combined HAP in any consecutive 12-month period.

#### Monitoring/Recordkeeping:

- 1) The permittee shall monitor the amount and type of HAP containing materials used at the installation.
- 2) The permittee shall calculate and record facility-wide emissions of individual and combined HAP emissions on a rolling 12-month basis (See Attachments A and B)
- 3) These records shall be kept on-site for five years and shall be made immediately available for inspection to the Department of Natural Resources’ personnel upon request.

#### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which causes an exceedance of this regulation. Any deviations from this permit condition shall be reported in the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

### PERMIT CONDITION PW002

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

#### Emission Limitations:

This installation shall emit less than 100 tons of volatile organic compounds in any consecutive 12-month period.

#### Monitoring/Recordkeeping:

- 1) The permittee shall calculate and record facility-wide emissions of volatile organic compounds (VOCs) on a rolling 12-month basis. The permittee shall use Attachment C, or equivalent form, to verify compliance with the emission limitation listed above.
- 2) These records shall be made immediately available for inspection to the Department of Natural Resources’ personnel upon request.
- 3) These records shall be kept on-site for five years.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which causes an exceedance of this regulation. Any deviations from this permit condition shall be reported in the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION PW003**

10 CSR 10-6.060

**Construction Permits Required**

Air Pollution Control Program Construction Permit 0795-014

**Emission Limitation:**

If in the opinion of the Director, a continuing situation of demonstrated nuisance odors exists for the neighbors of the facility, the Director may require the permittee to submit a corrective action plan adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit. [[Special Condition 9](#)]

### III. Emission Unit Specific Emission Limitations

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

<b>Permit Condition 1</b>	
10 CSR 10-6.220	
<b>Restriction of Emissions of Visible Air Contaminants</b>	
2010 EIQ Reference #	Emission Unit Description
EP-4	<i>Shot Blast #1</i> ; Abrasive blasting of metal parts with slag abrasives; MHDR: 0.65 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed: 1965
EP-6	<i>Shot Blast #2</i> ; Abrasive blasting of metal parts with slag abrasives; MHDR: 0.33 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed: 1978
EP-15	<i>Shot Blast #3</i> ; Abrasive blasting of metal parts with slag abrasives; MHDR: 8.92 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99.4%; Installed: 1995
EP-7	<i>Old Painting Booth</i> ; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1965
EP-11	<i>New Paint Booth</i> ; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1996
EP-17	<i>North End Paint Booth</i> ; MHDR: 4.40 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1995

**Emission Limit:**

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any existing source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to 40%.

**Monitoring:**

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

- c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 4) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results (see Attachment D), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain a record of any equipment malfunctions (see Attachment F).
- 3) The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition (see Attachment E).

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

<b>Permit Condition 2</b>	
10 CSR 10-6.400	
<b>Restriction of Emission of Particulate Matter from Industrial Processes</b>	
2010 EIQ Reference #	Emission Unit Description
EP-4	<i>Shot Blast #1</i> - Abrasive blasting of metal parts with slag abrasives; MHDR: 0.65 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed: 1965
EP-6	<i>Shot Blast #2</i> - Abrasive blasting of metal parts with slag abrasives; MHDR: 0.33 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed: 1978

**Emission Limit:**

- 1) Shot Blast #1 - The permittee shall not emit particulate matter in excess of 3.07 lb/hr. [\[§6.400\(3\)\(A\)1\]](#)
- 2) Shot Blast #2 - The permittee shall not emit particulate matter in excess of 1.95 lb/hr. [\[§6.400\(3\)\(A\)1\]](#)
- 3) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grains per standard cubic feet of exhaust gases. [\[§6.400\(3\)\(A\)4\]](#)

**Monitoring:**

- 1) The shot blast shall not be operated without a fabric filter in place.
- 2) Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before blasting begins and after installation of a new filter.
- 4) The manufacturer’s recommendations shall be followed with regard to installation and frequency of replacement of the filters.

**Recordkeeping:**

- 1) The permittee shall maintain records of the inspections of fabric filters when they occur.
- 2) All inspections, corrective actions, and instrument calibrations shall be recorded.
- 3) Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
- 4) All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

<b>Permit Condition 3</b>	
10 CSR 10-6.060	
<b>Construction Permits Required</b>	
Air Pollution Control Program Construction Permit 0795-014	
2010 EIQ Reference #	Emission Unit Description
EP-11	<i>New Paint Booth</i> ; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1996
EP-15	<i>Shot Blast #3</i> - Abrasive blasting of metal parts with slag abrasives; MHDR: 8.92 ton/hr; Dust collector: capture efficiency 100%, control device efficiency 99.4%; Installed: 1995

**Emission Control Requirement:**

- 1) Shot Blast #3 (EP-15) - The particulate control and removal system shall be designed to remove at least 99.4% of the particulate matter less than ten microns (PM<sub>10</sub>) in the exhaust air stream. [[Permit 0795-014, Special Condition 1](#)]
- 2) Painting Operations (EP-11) - The particulate control and removal system shall be designed to remove at least 95% of the particulate matter less than ten microns (PM<sub>10</sub>) in the exhaust air stream. [[Permit 0795-014, Special Condition 2](#)]

**Monitoring:**

The permittee shall operate the particulate control system according to the manufacturer’s recommendations at all times when the shot blast is in operation. The manufacturer’s recommendations shall be followed with regard to installation and frequency of replacement of the filters including the stocking of adequate replacement parts. [[Permit 0795-014, Special Condition 4](#)]

**Recordkeeping:**

- 1) The permittee shall maintain records of the inspections of fabric filters when they occur.
- 2) All inspections, corrective actions, and instrument calibrations shall be recorded.
- 3) Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
- 4) All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

<b>Permit Condition 4</b>	
10 CSR 10-5.330	
<b>Control of Emissions from Industrial Surface Coating Operations</b>	
2010 EIQ Reference #	Emission Unit Description
EP-7	<i>Old Painting Booth</i> ; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1965
EP-8	<i>Old Swab Painting</i> ; Manual swab painting
EP-20	<i>New Swab Painting</i> ; Manual swab painting
EP-10	<i>Old Stencil Position</i> ; Painting process which involves painting identification numbers on railcars; Spray guns as well as non-spray applications and plastic stick-ons are used; Emissions are fugitive; MHDR: 4 gal/hr; Installed: 1965
EP-11	<i>New Paint Booth</i> ; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1996
EP-13	<i>New Stencil Position</i> ; Manual stenciling process involves painting identification numbers on railcars; Spray gun as well as non-spray applications and plastic stick-ons are used; Emissions are fugitive; MHDR 4 gal/hr; Installed 1996
EP-17	<i>North End Paint Booth</i> ; North End Paint Booth MHDR: 4.40 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1995

**Emission Limit:**

The permittee shall not apply any coating with VOC content in excess of 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds).

**Monitoring:**

- 1) The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
- 2) The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG<sub>VW</sub>) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
  - a) Calculate the DAVG<sub>VW</sub> of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

- 3) If the daily volume-weighted average ( $DAVG_{VW}$ ) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

**Recordkeeping:**

- 1) The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include (see Attachment G):
  - a) Daily records of the type and the quantity of coatings used daily;
  - b) The coatings manufacturer’s formulation data for each coating in forms provide or approved by the Director;
  - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
  - f) Daily records of the quantity of pieces of materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
- 2) All records shall be maintained for a minimum of five years.
- 3) These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

<b>Permit Condition 5</b>	
10 CSR 10-6.060	
<b>Construction Permits Required</b>	
Air Pollution Control Program Construction Permit 112000-004	
2010 EIQ Reference #	Emission Unit Description
EP-9	Direct fired drying oven; Fuel: natural gas; MHDR: 3.24 MMBtu/hr; Retrofitted: 2000

**Operation Limitation:**

No fuels other than natural gas shall be combusted in the drying oven at any time of operation. [\[Special Condition 1\]](#)

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

### Permit Condition 6

10 CSR 10-6.060

#### Construction Permits Required

APCP Construction Permit 0795-014

2010 EIQ Reference #	Emission Unit Description
EP-11	<i>New Paint Booth</i> ; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1996
EP-12	<i>New Drying Oven</i> ; Direct fired drying oven; Fuel: pipeline grade natural gas; MHDR 4.16 MMBtu/hr; Installed 1996
EP-13	<i>New Stencil Position</i> ; Manual stenciling process involves painting identification numbers on railcars; Spray gun as well as non-spray applications and plastic stick-ons are used; Emissions are fugitive; MHDR 4 gal/hr; Installed 1996

#### Emission Limit:

The permittee shall limit the emissions of VOC from the paints, thinners and solvents to no more than 39.7 tons during any consecutive 12-month period. [\[Special Condition 5\]](#)

#### Monitoring/ Recordkeeping:

- 1) For each calendar month, the permittee shall keep records, using Attachment C or an equivalent form, for each type of paint, thinner or cleanup solvent used: [\[Special Condition 6.a\]](#)
  - a) Amount used (gallons)
  - b) Density (lb/gal)
  - c) VOC content (lb/gal)
  - d) VOC content (weight %)
  - e) VOC emission (tons)
- 2) For each calendar month, the permittee shall summarize VOC emissions by adding the VOC emissions determined through recordkeeping for each paint, thinner and cleanup solvent used. The emissions of VOC for each calendar month shall be added to the total VOC emitted during the previous consecutive eleven (11) months, using Attachment K or equivalent, to determine VOC emissions for the consecutive 12-month period. [\[Special Condition 6.b and 6.c\]](#)
- 3) All records shall be maintained for a minimum of five years. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request. [\[Special Condition 7\]](#)

#### Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation. [\[Special Condition 8\]](#)

### Permit Condition 7

10 CSR 10-6.400

#### Restriction of Emission of Particulate Matter from Industrial Processes

2010 EIQ Reference #	Emission Unit Description
EP-7	<i>Old Paint Booth</i> - Painting operation; MHDR: 26.42 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1965
EP-17	<i>North End Paint Booth</i> - Painting operation; MHDR: 4.40 gallons/hr; Dust collector: capture efficiency 100%, control device efficiency 99%; Installed 1995

#### **Emission Limit:**

- 1) Old Paint Booth - The permittee shall not emit particulate matter in excess of 1.03 lb/hr. [[§6.400\(3\)\(A\)1](#)]
- 2) North End Paint Booth - The permittee shall not emit particulate matter in excess of 0.31 lb/hr. [[§6.400\(3\)\(A\)1](#)]
- 3) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases. [[§6.400\(3\)\(A\)4](#)]

#### **Monitoring:**

- 1) The paint booth shall not be operated without a fabric filter in place.
- 2) Fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before painting begins and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

#### **Recordkeeping:**

- 1) The permittee shall maintain records of the inspections of fabric filters when they occur.
- 2) All inspections, corrective actions, and instrument calibrations shall be recorded.
- 3) Attachment F contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
- 4) All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

#### **Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

<b>Permit Condition 8</b>	
10 CSR 10-5.300	
<b>Control of Emissions from Solvent Metal Cleaning</b>	
<b>120-Gallon Parts Washer</b>	
2010 EIQ Reference #	Emission Unit Description
EP-19	120-gallon parts cleaning station used to clean mechanical parts; Parts washer uses Safety-Kleen premium solvent; Installed 1986

**Equipment and Operating Parameters:**

- 1) After April 1, 2001, the permittee shall not operate a cold cleaner using a solvent with a vapor pressure greater than 1.0 mmHg at 20 degrees Celsius (20°C). Exemption: Solvent cleaning operations which meet the emission control requirements of 10 CSR 10-5.330 shall be exempt for the requirements listed above.
- 2) The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The Director must approve the alternative method.
- 3) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into the enclosed reservoir, except when performing maintenance or collecting solvent samples.
- 4) Clean parts shall be drained in the freeboard area for at least fifteen seconds or until dripping ceases, whichever is longer.
- 5) When the solvent volatility is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F), and/or the solvent is agitated, and/or the solvent is heated, the design of the cover shall be such that it can be easily operated with one hand and without disturbing the solvent vapors in the tank (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems).
- 6) The cold cleaner shall have a drainage facility which will be internal so that parts are enclosed under the cover while draining. If the internal drainage facility cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- 7) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized, or shower type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
- 8) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
- 9) If the solvent volatility is greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or is heated above one hundred twenty degrees Fahrenheit (120°F), then one of the following control devices must be used:
  - a) Freeboard ratio of at least 0.75;
  - b) Water cover (solvent must be insoluble in and heavier than water); or
  - c) Demonstrate an overall VOC emission reduction efficiency greater than or equal to 65% through a control system approved by the Director.
- 10) Waste solvent shall be stored in closed containers only.

- 11) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or equivalent (upon approval by the Director) and in accordance with 10 CSR 10-25, as applicable:
  - a) Reduction of the waste material to less than 20% VOC solvent by distillation and disposal of the still bottom waste; or
  - b) Storage in closed containers for transfer to -
    - i) A contract reclamation service; or
    - ii) A disposal facility approved by the Director.
- 12) If the cold cleaner fails to perform within the operating procedures established by this rule or if solvent leaks occur within the cold cleaner, the unit shall be shut down immediately. It shall remain shut down until the operator or trained service personnel are able to restore operation within the established parameters.
- 13) Solvent leaks shall be repaired immediately or the degreaser shall be shut down until the leaks are repaired by the operator or trained service personnel.
- 14) Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the cold cleaner. The supervisor of the operators shall receive equal or greater operational training than the operators. Refresher training shall be given to all solvent metal cleaning equipment operators at least once every twelve months.

**Monitoring/Recordkeeping:**

- 1) The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.
- 2) The permittee shall maintain the following records for each purchase of cold cleaner solvent (see Attachment H):
  - a) Name and address of the solvent supplier;
  - b) Date of purchase;
  - c) Type of solvent purchased; and,
  - d) Vapor pressure of solvent in mmHg at 20 degrees Celsius (20°C).
- 3) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises (see Attachment I). The record also shall include maintenance and repair logs that occurred on the cold cleaner (see Attachment F).
- 4) The permittee shall keep a record of solvent metal cleaning training for each employee on an annual basis (see Attachment J).
- 5) All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

<b>Permit Condition 9</b>	
10 CSR 10-5.300	
<b>Control of Emissions from Solvent Metal Cleaning</b>	
<b>5-Gallon Parts Washer</b>	
2010 EIQ Reference #	Emission Unit Description
EP-19	5-gallon parts cleaning station used to clean paint spray guns

**Equipment and Operating Parameters:**

- 1) The permittee shall clean spray guns used in the application of (and not limited to) primers, paint, specialty coatings, adhesives, sealers, resins and deadeners utilizing one or more of the following techniques:
  - a) Enclosed system spray gun cleaning shall consist of forcing solvent through the gun. Spray guns and nozzles only may be cleaned in remote closed top spray gun cleaning machines containing solvent-based materials capable of cleaning, provided the removable clean and spent solvent containers (not to exceed thirty gallons in size) are kept tightly closed or covered at all times except when being accessed or maintained. All remote spray gun cleaning machines shall be operated within the manufacturer’s specifications. All remote closed top spray gun cleaning machines shall not be operated unless the cover is closed and shall be closed or covered when not in use;
  - b) Nonatomized cleaning shall consist of spray guns being cleaned by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The cleaning solvent from the spray gun shall be directed into (and not limited to) a pail, bucket, drum, or other waste container that is closed when not in use;
  - c) Disassembled cleaning shall consist of spray guns being cleaned by disassembling and cleaning the components by hand in a cold cleaner, which shall remain closed at all times except when in use. Alternatively, the components shall be soaked in a cold cleaner, which shall remain closed during the soaking period and when not inserting or removing components;
  - d) Atomizing cleaning shall consist of spray guns being cleaned by forcing the cleaning solvent through the gun and directing the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions; and
  - e) Exemption: Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the above requirements.

**Monitoring/Recordkeeping:**

- 1) The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.
- 2) The permittee shall maintain the following records for each purchase of cold cleaner solvent (see Attachment H):
  - a) Name and address of the solvent supplier;
  - b) Date of purchase;
  - c) Type of solvent purchased; and,
  - d) Vapor pressure of solvent in mmHg at 20 degrees Celsius (20°C).
- 3) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all

amounts distilled on the premises (see Attachment I). The record also shall include maintenance and repair logs that occurred on the cold cleaner (see Attachment F).

- 4) The permittee shall keep a record of solvent metal cleaning training for each employee on an annual basis (see Attachment J).
- 5) All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

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

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Yard waste, with the following exceptions:
    - i) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Union Pacific Railroad Company –DeSoto Car Shop may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Union Pacific Railroad Company –DeSoto Car Shop fails to comply with the provisions or any condition of the open burning permit.
  - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of

Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

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

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

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

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the Director. The reports shall be submitted to the Director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

#### **10 CSR 10-6.150 Circumvention**

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

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

##### **Emission Limitation:**

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

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

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

### **10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

### **10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

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

**This requirement is not federally enforceable.**

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

### **10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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

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

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

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

## V. General Permit Requirements

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

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

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements**

- 1) Recordkeeping
  - 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 Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

#### **10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

#### **10 CSR 10-6.065(5)(C)1.A General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

None.

**10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

**10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

#### **10 CSR 10-6.020(2)(R)12 Responsible Official**

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

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

This permit may be reopened for cause if:

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

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

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

## **VI. Attachments**

Attachments follow.

**Attachment A**  
**Monthly Individual HAP Emissions Worksheet**

This is an example of a form that may be used to record data required by Permit Condition PW001. The permittee must demonstrate that the facility does not emit more than 10 tons of any individual HAP in any consecutive twelve-month period.

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

Column A	Column B	Column C	Column D	Column E	Column F	Column I
Type of Material (Note 1)	HAP (Note 2)	Throughput	Throughput Units	Emission Factor (Note 3)	Emission Factor Units (Note 4)	HAP Emissions (tons) (Note 5)
Total HAP Emissions Calculated for this Month (tons)					(Note 6)	
12-Month HAP Emissions Total From Previous Month's Worksheet (tons)					(Note 7)	
Monthly HAP Emissions Total From Previous Year's Worksheet (tons)					(Note 8)	
Current 12-Month Total HAP Emissions (tons)					(Note 9)	

- Note 1: Type of material used.
- Note 2: Name of the HAP contained in the material that was used. Since this sheet is for tracking individual HAPs emission totals, all the HAPs listed in this column should be the same.
- Note 3: Use the appropriate emission factor for the appropriate application material and method.
- Note 4: The emission factors units used should correspond to the throughput units.
- Note 5: Report HAP emissions in tons. For example, if Column D is in gallons and Column F is in lb/gallon then Column I = [(Column C) x (Column E)]/2000.
- Note 6: Sum of HAP emissions reported in Column I.
- Note 7: Running 12-month total of HAP emissions.
- Note 8: HAP emissions reported for this month in the last calendar year.
- Note 9: Amount reported in Note 7 minus amount reported in Note 8 plus amount reported in Note 6. Less than or equal to 9.4 tons indicates compliance.



Attachment B (Continued)

Notes For Attachment B

- Note 1: Type of material used.
- Note 2: Name of the HAP contained in the material that was used.
- Note 3: Use the appropriate emission factor for the appropriate application material and method.
- Note 4: The emission factors units used should correspond to the throughput units.
- Note 5: Report HAP emissions in tons. For example, if Column D is in gallons and Column F is in lb/gallon then Column I = [(Column C) x (Column E)]/2000.
- Note 6: Sum of HAP emissions reported in Column I.
- Note 7: Running 12-month total of combined HAP emissions.
- Note 8: Combined HAP emissions reported for this month in the last calendar year.
- Note 9: Amount reported in Note 7 minus amount reported in Note 8 plus amount reported in Note 6. Less than or equal to 24.4 tons indicates compliance.





**Attachment E**  
 Method 9 Opacity Observations

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

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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













## STATEMENT OF BASIS

### Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than 18 months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

### Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received May 10, 2011;
- 2) 2006-2010 Emissions Inventory Questionnaires;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

### Construction Permit History

Permit No.	Project Description
0795-014	New railcar repair/painting facility located adjacent to an existing repair and painting facility.
112000-004	Expand drying oven

### Construction Permit Revisions

None.

### New Source Performance Standards (NSPS) Applicability

None.

### Maximum Achievable Control Technology (MACT) Applicability

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

This regulation does not apply to the parts washers because these units use nonhalogenated solvents.

40 CFR Part 63, Subpart M, *Surface Coating of Miscellaneous Metal Parts and Products*

Union Pacific Railroad Company - De Soto Car Shop has the potential to exceed the major source threshold for HAPs and be affected by Subpart M. However, the installation has voluntarily agreed to federally enforceable limitations to limit emissions of HAPs to less than ten tons per year

for any single HAP and/or 25 tons per year for combined HAPs. Operating under this condition will ensure that this installation is not a major source for HAPs and is not subject to the MACT requirements for Subpart MMMM.

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

Records indicate that this facility does not use any coatings that contain a target HAP as defined in the rule, and the cleaning solvents used do not contain methylene chloride.

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

None.

**Other Regulatory Determinations**

10 CSR 10-3.060 *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*/10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

The only indirect heating sources at this facility are natural gas fired space heaters with a cumulative heat input of 29,000 Btu (0.29 MMBtu). The drying ovens and Blacksmith Forge are direct fired units and not subject to this rule.

10 CSR 10-6.065 *Operating Permits*

Operating Permit applicability –

A Part 70 facility is an installation that has potential emissions that are greater than or equal to 100 tons per year of any one of the following criteria pollutants;	PTE (tons/year)
a) PM <sub>10</sub>	38
b) Sulfur Dioxide (SO <sub>x</sub> ).	0.10
c) Nitrogen Oxide (NO <sub>x</sub> ).	16
d) Volatile Organic Compounds (VOCs).	194
e) Carbon Monoxide (CO).	6.76
or; A Part 70 facility is an installation that has potential emissions that are greater than 10 tons/year of individual HAP or 25 tons per year combined HAP.	33/68

Construction Permit 0795-014 limits the New Paint Booth (EP-11) and New Stencil Position (EP-13) to 39.7 tons/year of VOC. The remaining VOC emitting units at this facility were installed before the applicability date of 10 CSR 10-6.060 *Construction Permits Required* and are considered “grandfathered units”. For this reason, a more precise PTE could not be calculated for VOC and HAP without further knowledge of the process limitations of the grandfathered units. The PTE of 194 tons of VOC in the table above is derived from using the properties of “worst case” coating as listed in the application. In the table below, the PTE for HAP was calculated by using the highest throughput for each unit reported in the previous five years of EIQ submittals (2011) and scaling up the usage to 8760 hours from the hours reported. As the table shows, the facility is major for individual HAP (Dibutyl phthalate) and combined HAP.

2011 EIQ Ref.#	CAS	Chemical Name	Amount Used @2080 hours (lbs)	Amount Used @2080 hours (tons)	PTE @8760 hours (tons)
7	84-74-2	Dibutyl phthalate	1630	0.82	3.43
	107-21-1	Ethylene glycol	173.25	0.09	0.36
11	84-74-2	Dibutyl phthalate	13859.99	6.93	29.19
	107-21-1	Ethylene glycol	13859.99	6.93	29.19
HAP Totals (tpy)				14.76	68.39

An uncontrolled potential for PM<sub>10</sub> was calculated to be 576 tons/year without the consideration of process bottlenecks that may exist for the grandfathered units. However, after applying credit for the federally enforceable controls required from §6.400 in Permit Conditions 2 and 7 reduces the PTE to 37.65 tons/year at 8760 hours operation.

Intermediate installations are Part 70 installations that become basic state installations based on their potential to emit by accepting the imposition of voluntarily agreed to federally enforceable limitations more stringent than those otherwise required by rule or regulation. Plant Wide Permit Condition PW001 limits the facility to less than major levels for HAP and VOC, with compliance demonstrated with emissions tracking by the facility.

The facility had also requested in the application to place a similar voluntary plant wide limit for PM<sub>10</sub>. As mentioned above, the controlled PTE is well below the major threshold of 100 tons, when the requirements of Permit Conditions 2 and 7 are being met. Therefore the plant wide limit for PM<sub>10</sub> was not placed into this permit, because the required emissions tracking to demonstrate compliance would be duplicative and unnecessary.

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

New Shot Blast (EP-15) is subject to Construction Permit 0795-014 which requires 99.4% particulate control, exempting it from this rule per 10 CSR 10-6.400(B)14.

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

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

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

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

Prepared by:

---

Don Murphy  
Environmental Engineer

CERTIFIED MAIL: 70093410000193532214  
RETURN RECEIPT REQUESTED

Mr. Casey Dyer  
Union Pacific Railroad – DeSoto Car Shop  
491 North Main Street  
Desoto, MO 63020

Re: Installation, 099-0011  
Permit Number: **OP2012-036**

Dear Mr. Dyer:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Don Murphy at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/dmk

Enclosures

c: St. Louis Regional Office Regional Office  
PAMS File: 2011-05-030