

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

MAR 30 2015

Mr. Paul Whaley
US Ringbinder L.P.
6800 Arsenal
St. Louis, MO 63139

Re: US Ringbinder L.P. (510-1123)
Permit Number: **OP2014-041**

Dear Mr. Whaley:

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 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Hess 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/ahk

Enclosures

c: St. Louis Regional Office
PAMS File: 2014-07-040



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2014-041
Expiration Date: MAR 30 2020
Installation ID: 510-1123
Project Number: 2014-07-040

Installation Name and Address

US Ringbinder L.P.
6800 Arsenal
St. Louis, MO 63139
City of St. Louis

Installation Description:

US Ringbinder L.P. designs and manufactures metal ring binders. The operation mainly consists of custom orders. The installation is a synthetic minor source of Trichloroethylene (79-01-6).

MAR 30 2015

Effective Date


Director of Designee
Department of Natural Resources

Prepared by:



Alana L. Hess, P.E.
Environmental Engineer III

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

US Ringbinder L.P. designs and manufactures metal ring binders. The operation mainly consists of custom orders. The installation is a synthetic minor source of Trichloroethylene (79-01-6).

The installation is not on the List of Named Installation found at 10 CSR 10-6.020(3)(B) Table 2; therefore, fugitive emissions are not counted towards major source applicability.

Reported Air Pollutant Emissions (tons per year)					
Pollutants	2013	2012	2011	2010	2009
PM ₁₀	-	-	-	-	-
PM _{2.5}	-	-	-	-	-
SO _x	-	-	-	-	-
NO _x	-	-	-	-	-
VOC	0.66	4.61	4.93	5.07	5.01
CO	-	-	-	-	-
HAP	1.34	4.88	5.22	5.22	5.01
Trichloroethylene (79-01-6)	1.34	4.88	5.22	5.22	5.01

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.

Emission Unit	Description	Applicable Requirements
EP-02	1967 Detrex 600 gallon conveyORIZED Vapor Degreaser	MACT T

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. These emission units are subject to plant wide emission limitations.

Emission Unit	Description
EP-01	Process Boiler - 2.207 MMBtu/hr natural gas
EP-03	Heating Boiler - 2.396 MMBtu/hr natural gas
EP-04	Cold Cleaner – Aqueous Solvent

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR and 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)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 10.0 tons of Trichloroethylene (79-01-6) in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall maintain accurate records of monthly and 12-month rolling total Trichloroethylene usage using Attachment B.
2. The permittee shall maintain all records required by this permit for not less than five years.
3. The permittee shall make all records available to Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning	
Emission Unit	Description
EP-02	Vapor Degreaser

Standards:

1. The permittee shall comply with the following requirements: [§63.464(a)(1)]
 - a) Maintain a log of solvent additions and deletions for each solvent cleaning machine. [§63.464(a)(1)(i)]
 - b) Ensure that the emissions from each solvent cleaning machine are equal to or less than the applicable emission limit presented in Table 5 of MACT T as determined using the procedures in §63.465(b) and (c). [§63.464(a)(1)(ii)]
2. The permittee shall demonstrate compliance with the applicable three-month rolling average monthly emission limit on a monthly basis as described in §63.465(b) and (c). [§63.464(b)]
3. If the applicable three-month rolling average emission limit is not met, an exceedance has occurred. All exceedances shall be reported as required in §63.468(h). [§63.464(c)]

Table 5 to MACT T — *Emission Limits for Batch Vapor and In-Line Solvent Cleaning Machines With a Solvent/Air Interface*

Solvent Cleaning Machine	Three-month rolling average monthly emission limit (kg/m ² /month)
Batch vapor solvent cleaning machines	150
Existing in-line solvent cleaning machines	153

Test Methods:

1. The permittee shall, on the first operating day of every month ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line shall be indicated during the first month the measurements are made. The solvent level within the machine shall be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in §63.645(c). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations. [§63.465(b)]
2. The permittee shall, on the first operating day of the month, comply with the requirements specified in §63.645(c)(1) through (3). [§63.465(c)]
 - a) Using the records of all solvent additions and deletions for the previous monthly reporting period required under §63.464(a), determine solvent emissions (E_i) using Equation 2:

$$E_i = \frac{SA_i - LSR_i - SSR_i}{AREA_i} \quad \text{Equation 2}$$

Where:

E_i = the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i , (kilograms of solvent per square meter of solvent/air interface area per month).

SA_i = the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i , (kilograms of solvent per month).

LSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period i , (kilograms of solvent per month).

SSR_i = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in §63.465(c)(2), during the most recent monthly reporting period i , (kilograms of solvent per month).

$AREA_i$ = the solvent/air interface area of the solvent cleaning machine (m^2). [§63.465(c)(1)]

b) Determine SSR_i using the method specified in §63.465(c)(2)(i) or (ii). [§63.465(c)(2)]

i) From tests conducted using EPA reference method 25d. [§63.465(c)(2)(i)]

ii) By engineering calculations included in the compliance report. [§63.465(c)(2)(ii)]

c) Determine the monthly rolling average, EA , for the three-month period ending with the most recent reporting period using Equation 4:

$$EA_i = \frac{\sum_{j=1}^3 E_i}{3} \text{ Equation 4}$$

Where:

EA_i = the average halogenated HAP solvent emissions over the preceding three monthly reporting periods, (kilograms of solvent per square meter of solvent/air interface area per month).

E_i = halogenated HAP solvent emissions for each month (j) for the most recent three monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area).

$j=1$ = the most recent monthly reporting period.

$j=2$ = the monthly reporting period immediately prior to $j=1$.

$j=3$ = the monthly reporting period immediately prior to $j=2$. [§63.465(c)(3)]

3. The permittee shall determine their potential to emit from all solvent cleaning operations, using the procedures described in §63.465(e)(1) through (3). A facility's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the facility. [§63.465(e)]

a) Determine the potential to emit for each individual solvent cleaning using Equation 6.

$$PTE_i = H_i \times W_i \times SAI_i \quad \text{Equation 6}$$

Where:

PTE_i = the potential to emit for solvent cleaning machine i (kilograms of solvent per year).

H_i = hours of operation for solvent cleaning machine i (hours per year) = 8,760 hours per year, unless otherwise restricted by a federally enforceable requirement.

W_i = the working mode uncontrolled emission rate (kilograms per m^2 per hour) = 1.95 kilograms per m^2 per hour for batch vapor cleaning machines = 1.12 kilograms per m^2 per hour for in-line cleaning machines.

SAI_i = solvent/air interface area of solvent cleaning machine i (m^2). §63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. [§63.465(e)(1)]

b) Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility. [§63.465(e)(3)]

Recordkeeping Requirements:

1. The permittee shall maintain records specified in §63.467(c)(1) through (3) either in electronic or written form for a period of five years. [§63.467(c)]

- a) The dates and amounts of solvent that are added to the solvent cleaning machine. [§63.467(c)(1)]
 - b) The solvent composition of wastes removed from cleaning machines as determined using the procedure described in §63.465(c)(2). [§63.467(c)(2)]
 - c) Calculation sheets showing how monthly emissions and the rolling three-month average emissions from the solvent cleaning machine were determined, and the results of all calculations. [§63.467(c)(3)]
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

1. The permittee shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in §63.468(g)(1) through (3). [§63.468(g)]
 - a) The size and type of each unit subject to MACT T (solvent/air interface area or cleaning capacity). [§63.468(g)(1)]
 - b) The average monthly solvent consumption for the solvent cleaning machine in kilograms per month. [§63.468(g)(2)]
 - c) The three-month monthly rolling average solvent emission estimates calculated each month using the method as described in §63.465(c). [§63.468(g)(3)]
2. The permittee shall submit an exceedance report to the Director semiannually except when, the Director determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under §63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in §63.468(h)(2) and (3). [§63.468(h)]
 - a) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken. [§63.468(h)(2)]
 - b) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report. [§63.468(h)(3)]
3. If the permittee is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in §63.468(i)(1) through (3) are met. [§63.468(i)]
 - a) The source has demonstrated a full year of compliance without an exceedance. [§63.468(i)(1)]
 - b) The permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR Part 63, Subpart A and in MACT T. [§63.468(i)(2)]
 - c) The Director does not object to a reduced frequency of reporting for the affected source. [§63.468(i)(3)]
4. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.
5. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR, 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 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 permittee fails to comply with the conditions or any provisions of the permit.
4. Reporting and Recordkeeping. NSPS CCCC establishes certain requirements for incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of NSPS 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 §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.
5. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by NSPS Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of NSPS 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 §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 §§ 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 §§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 18 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 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 2014, 2017, 2020, and 2023 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 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 10-6.180 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 10-6.250 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 Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the 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
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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 40 CFR Part 82, Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A - Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B - Servicing of MVACs. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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 promulgated pursuant to 40 CFR Part 82, Subpart G - Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

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

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR and 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in 10 CSR 10-6.065(6)(C)7 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 §112(r)

- 1. 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 §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:
 - a) June 21, 1999;
 - b) Three years after the date on which a regulated substance is first listed under §68.130; or
 - c) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

None.

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

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

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

1. An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

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

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

1. Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification. Please note: changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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)39 Responsible Official

The application utilized in the preparation of this permit was signed by Paul Whaley, Director of Manufacturing. 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 permittee 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 permittee 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

1. This permit may be reopened for cause if:
 - a) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
 - b) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - i) The permit has a remaining term of less than three years;
 - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - iii) 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,
 - c) 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 contains a list of abbreviations and acronyms used throughout this permit.

Attachment A
Abbreviations and Acronyms

°Cdegrees Celsius	µg/m³ micrograms per cubic meter
°Fdegrees Fahrenheit	m/s meters per second
AAQIAambient air quality impact analysis	mgmilligrams
acfmactual cubic feet per minute	Mgal 1,000 gallons
BACTBest Available Control Technology	MW megawatt
BMPsBest Management Practices	MHDR maximum hourly design rate
BtuBritish thermal unit	MMBtu Million British thermal units
CAMCompliance Assurance Monitoring	mmHgmillimeters mercury
CASChemical Abstracts Service	MMscf Million standard cubic feet
CEMSContinuous Emission Monitor System	MSDS Material Safety Data Sheet
CFRCode of Federal Regulations	NAAQS National Ambient Air Quality Standards
COcarbon monoxide	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CO₂carbon dioxide	NO_x nitrogen oxides
CO_{2e}carbon dioxide equivalent	NSPS New Source Performance Standards
COMSContinuous Opacity Monitoring System	NSR New Source Review
CSRCode of State Regulations	PM particulate matter
dscfdry standard cubic feet	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
dscmdry standard cubic meter	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
EIQEmission Inventory Questionnaire	ppm parts per million
EPEmission Point	PSD Prevention of Significant Deterioration
EPAEnvironmental Protection Agency	psipounds per square inch
EUEmission Unit	PTE potential to emit
FGDflue gas desulfurization	RACT Reasonable Available Control Technology
FIREEPA's Factor Information Retrieval System	RAL Risk Assessment Level
fpsfeet per second	SCC Source Classification Code
ftfeet	scfm standard cubic feet per minute
GACTGenerally Available Control Technology	SCR selective catalytic reduction
GHGGreenhouse Gas	SIC Standard Industrial Classification
gpmgallons per minute	SIP State Implementation Plan
grgrains	SMAL Screening Model Action Levels
GWPGlobal Warming Potential	SO_x sulfur oxides
HAPHazardous Air Pollutant	SO₂ sulfur dioxide
hrhour	tph tons per hour
HPhorsepower	tpy tons per year
lbpound	VMT vehicle miles traveled
lb/hrpounds per hour	VOC Volatile Organic Compound
MACTMaximum Achievable Control Technology	

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. Part 70 Operating Permit Application, received March 18, 2011
2. 2013, 2012, 2011, 2010, and 2009 EIQs
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
4. FIRE: <http://cfpub.epa.gov/webfire/index.cfm?action=fire.SearchEmissionFactors>

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.300 *Control of Emissions From Solvent Metal Cleaning* is not applicable to the installation and has not been applied within this permit.

- ♦ The installation provided an MSDS for the solvent, ARMAKLEEN™ 4 in 1 Cleaner Concentrate, used in EP-04. The MSDS indicates the solvent contains a maximum of 21.1 weight percent VOC and has a flashpoint of >212°F. The solvent meets the definition of aqueous solvent at 10 CSR 10-5.300(2)(C). EP-04 is no longer subject to 10 CSR 10-5.300 while exclusively using this aqueous solvent.
- ♦ EP-02 is not subject to this regulation as 10 CSR 10-5.300(1)(D)1.C exempts solvent cleaning operations regulated under MACT T (see Permit Condition 001).

10 CSR 10-5.455 *Control of Emissions From Industrial Solvent Cleaning Operations* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-5.455(1)(C) exempts cold cleaners (EP-04) and conveyORIZED vapor degreasers (EP-02).

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.260(1)(A)2 exempts combustion equipment that uses exclusively pipeline grade natural gas.

10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installations where all units are fueled only by natural gas.

Construction Permits

The installation was issued a construction permit (94-10-114) by the City of St. Louis for the installation of EP-01. This permit was not issued under 10 CSR 10-6.060 and is not state or federally enforceable; therefore, it was not included within this permit.

The installation has no previously issued state/federally enforceable construction permits.

NSPS Applicability

None.

MACT Applicability

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* is applicable to EP-02 and has been applied within this permit (see Permit Condition 001) due to the “once in, always in” policy as the installation was a major source of HAP on the date of compliance. The solvent used in EP-04 does not contain any of the HAPs listed in §63.460(a); therefore, EP-04 is not subject to this regulation.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to the installation and has not been applied within this permit. The installation has accepted a voluntary condition (see Permit Condition PW001) which makes them a synthetic minor HAP source, provided this permit is issued prior to January 31, 2016, the installation is not subject to this regulation.

40 CFR Part 63, Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable to the installation and has not been applied within this permit. Gas-fired boilers are exempt from this regulation per §63.11195(e).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Updated Potential to Emit for the Installation

Pollutant	Unconditioned PTE (tons per year)¹	Conditioned PTE (tons per year)
CO	0.99	N/A
NO _x	1.96	N/A
PM ₁₀	0.16	N/A
PM ₂₅	0.16	N/A
SO _x	0.01	N/A
VOC	24.06	N/A
HAP	23.99	N/A
Trichloroethylene (79-01-6)	23.95	<10.0

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Other Regulatory Determinations

10 CSR 10-6.170 *Restriction of PM to Ambient Air Beyond the Premises of Origin* is applicable to the installation, but has not been applied within this permit. The installation has potential PM emissions of only 0.16 tons per year; therefore, no monitoring, recordkeeping, or reporting has been included in the permit.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit. The installation has potential PM emissions of only 0.16 tons per year; therefore, no monitoring, recordkeeping, or reporting has been included in the permit.

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:

Alana L. Hess, P.E.
 Environmental Engineer III