Harriett Jones

12/30/2003 02:23 PM

To: Amish.Daftari@dnr.mo.gov
cc: Pamela.Muren@dnr.mo.gov, (bcc: Harriett Jones/ARTD/R7/USEPA/US)
Subject: Boeing

Please remove the parenthetical phrase "(Federally and State enforceable)" that appears on page 8, page 9, page 10, page 11, page 12, page 13, page 14, page 15, and so on.

All terms and conditions in a Title V operating permit, except for those that are "state enforceable only," are "federally and state enforceable." Not only is it unnecessary to repeat this phrase, it has not been included in every permit term and condition, and therefore could result in confusion regarding enforceability issues.

Similarly, the phrase "Federally enforceable only" which appears on page 7, should be deleted. It is inappropriate for a permit issued by the state to not be enforceable by the state.
On page 19, change "(State-only enforceable until approved by EPA)" to "(State enforceable only."

These changes do not affect enforceability. They just clarify it.

Whether the state chooses to excercise enforcement discretion in a particular instance is an issue separate from enforceability.

This comment applies to all permits issued.

Thanks,

Harriett Jones, P.E.
Environmental Engineer
Air Permitting and Compliance Branch
Air, RCRA, and Toxics Division

EPA Region 7 - ARTD/APCO
901 N. 5th Street
Kansas City, KS 66101

(913) 551-7730
(913) 551-9730 (fax)

jones.harriett@epa.gov

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McDonnell Douglas Corporation a wholly-owned subsidiary of The Boeing Co.
P.O. Box 516, MC S-22114002211400
St. Louis, MO 63166

Re: Operating Permit Number:
McDonnell Douglas Corp. a wholly-owned subsidiary of The Boeing Co.
2600 North Third Street
St. Charles, MO 63301
St. Charles County Latitude: Degrees 38, Minutes 48, Seconds 47
Longitude: Degrees 90, Minutes 28, Seconds 21
This Permit Expires On:

Part 70 Operating Permit

Dear Sir/Madam:

Enclosed with this letter is your operating permit. Please review this document carefully. Operation of your facility in accordance with the rules and regulations cited in this document is necessary for continued compliance.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Roger D. Randolph
Director

RDR:thb

Enclosures

c: US EPA Region VII

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St. Louis Regional Office
PATS File: 183-0010-024

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PART 70 OPERATING PERMIT
Operating Permit Number:

McDonnell Douglas Corp.
a wholly-owned subsidiary of The Boeing Company
2600 North Third Street
St. Charles, MO 63301

Issued:
Expires:

Mailing Address:
McDonnell Douglas Corp. a wholly-owned subsidiary of The Boeing Co.
P.O. Box 516, MC S-22114002211400
St. Louis, MO 63166

St. Charles County, Latitude: Degrees 38, Minutes 48, Seconds 47
Longitude: Degrees 90, Minutes 28, Seconds 21

INSTALLATION DESCRIPTION

McDonnell Douglas Corporation a wholly owned subsidiary of The Boeing Company designs, develops, manufactures, integrates and supports a variety of aerospace and defense products. These include military and commercial aircraft, helicopters, missiles, space launch vehicles and other space systems, and sensing systems.

PERMIT REFERENCE DOCUMENTS

These documents were relied on in the preparation of this permit. While the operating permit application itself was relied on in the preparation of this permit, it is not incorporated by reference into this document.

The application that was utilized in the preparation of this permit is dated May 12, 1997; and was signed by John J. Van Gels, Vice President General Manager Production Operation and General Services. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program (APCP) of

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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 facility 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 facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

1996 Environmental Inventory Questionnaire (EIQ)
Construction Permit 0683-002
Construction Permit 0884-007
Construction Permit 0186-006A
Construction Permit 0487-014
Construction Permit 1187-001A
Construction Permit 1287-004A
Construction Permit 1189-013
Construction Permit 0290-010
Construction Permit 0991-002
Construction Permit 0792-003
Construction Permit 1292-016
Construction Permit 0294-019
Construction Permit 0195-020
Construction Permit 0396-022
Construction Permit 0997-007

GENERAL REQUIREMENTS - 10 CSR 10-6.065(6)(C)1.G.

McDonnell Douglas Corporation (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, for permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

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.

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 re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.

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This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

The permittee shall furnish to the APCP, upon receipt of a written request and within a reasonable time, any information that the APCP 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 APCP 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 requirement.

Permit Duration - 10 CSR 10-6.065(6)(C)1.B.
This permit is issued for a term of five (5) years. The permit term shall commence on the date of issuance of this permit. This permit will expire at the end of this five (5) year time period, unless renewed.

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

I) Record Keeping
   A) Retention of records
      1) All required monitoring data and support information shall be retained for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application.
      2) Affected sources under Title IV of the Act will have a three (3) year monitoring data record retention period as required in 40 CFR Part 75.
      3) Affected sources under Title III (MACT)of the Act will be subject to the provisions of 40 CFR Part 63, Subpart A, only as incorporated into an existing MACT standard
      4) Copies of all current operating and construction permits issued to this facility 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' (DNR) personnel upon request.
   B) Reporting Requirements
      1) The permittee shall submit a report (as specified under 2) of all required monitoring by:
         (a) October 1st for monitoring which covers the January through June time period, and
         (b) With the EIQ and annual compliance certification which is due on April 1st of each year for monitoring which covers the July through December time period.
      2) Each report must identify any deviations from permit requirements

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since the previous report, that have been monitored by the monitoring systems required under the permit, and any deviations from the monitoring, record keeping and reporting requirements of the permit.

3) Affected sources under Title III (MACT) of the Act will be subject to the provisions of 40 CFR Part 63, Subpart A, only as incorporated into an existing MACT standard.
4) These reports shall be submitted to the APCP, Operating Permit Unit, P.O. Box 176, Jefferson City, MO 65102.
   (a) The annual compliance certification shall be submitted to both the APCP, Operating Permit Unit, P.O. Box 176, Jefferson City, MO 65102, and to the Administrator, EPA Region 7 Missouri Air Compliance Coordinator, 726 Minnesota Avenue, Kansas City, KS 66101.
5) Submit supplemental reports as needed. In addition to semiannual monitoring reports, you are required to submit supplemental reports no later than ten days after any exceedance of any applicable rule, regulation or other restriction based on the monitoring or Record keeping described in this permit. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
   (a) 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 (2) working days after the date on which the emission limitation is exceeded due to the emergency, if you wish 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 that you can identify the cause(s) of the emergency. The permitted facility 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 based on its operating and maintenance plan. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
   (b) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
   (c) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.

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6) Every report submitted shall be certified by a responsible official, except that, if a report of a deviation must be submitted within ten (10) days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten (10) days after that, together with any corrected or supplemental information required concerning the deviation.
7) The permittee may request confidential treatment of information submitted in any report of deviation.
8) These supplemental reports shall be submitted to the APCP, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten (10) days after any exceedance of any applicable rule, regulation, or other restriction.

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

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 (3) 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.

Title VI 40 CFR Part 82 ~~(Federally enforceable only)~~

The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
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.
The placement of the required warning statement must comply with the requirements pursuant to §82.108.
The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
The permittee shall comply with the standards for recycling and emissions

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reduction pursuant to 40 CFR part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
Persons opening appliances containing ozone depleting substances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
Equipment used during the maintenance, service, repair, or disposal of appliances containing ozone depleting substances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
Persons performing maintenance, service, repair, or disposal of appliances containing ozone depleting substances must be certified by an approved technician certification program pursuant to §82.161.
Persons disposing of small appliances containing ozone depleting substances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance as defined at §82.152).
Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
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.
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.*
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 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.
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.*

Severability Clause - 10 CSR 10-6.065(6)(C)1.F (~~Federally and State enforceable).~~

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force.

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Incentive Programs Not Requiring Permit Revisions - 10 CSR 10-6.065(6)(C)1.H (Federally and State enforceable).

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

Compliance Requirements - 10 CSR 10-6.065(6)(C)3 ~~(Federally and State enforceable).~~

I) General Requirements, including Certification.
   A) Unless otherwise specified, any document (including reports) required to be submitted under this permit shall contain a certification signed by a responsible official that to the best of his/her knowledge the results of the required monitoring are true and accurate.

II) Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri DNR, or their authorized agents, to perform the following (subject to your right to seek confidential treatment of information submitted to, or obtained by, the APCP).
   A) Enter upon your 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.

III) Progress Reports
   A) 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:
      1) 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
      2) 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.

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IV) Compliance Certification

A) The permittee shall submit a 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.

B) These certifications shall be submitted annually (unless the applicable requirement specifies submission more frequently),

C) The compliance certification shall include the following:

1) The identification of each term or condition of the permit that is the basis of the certification,
2) Your current compliance status, as shown by monitoring data and other information reasonably available to you,
3) Whether compliance was continuous or intermittent,
4) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
5) Such other facts as the APCP will require in order to determine the compliance status of this facility.

Permit Shield - 10 CSR 10-6.065(6)(C)6 ~~(Federally and State enforceable).~~
Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

1) The applicable requirements are included and specifically identified in this permit; or
2) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:

1) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
2) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
3) The applicable requirements of the acid rain program,
4) The administrator's authority to obtain information, or
5) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions - 10 CSR 10-6.065(6)(C)7 ~~(Federally and State enforceable).~~
An emergency or upset shall constitute an affirmative defense to an

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enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, you must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

1) That an emergency or upset occurred and that you can identify the source of the emergency or upset,
2) That the installation was being operated properly,
3) That you took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit.
4) That you submitted notice of the emergency to the APCP within two (2) 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.

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.

Operational Flexibility - 10 CSR 10-6.065(6)(C)8 ~~(Federally and State enforceable).~~

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify this agency and the administrator at least seven (7) days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally-enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

I) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   A) Before making a change under this provision, the permittee shall provide advance written notice to this agency and to the administrator, describing the changes to be made, the date on which the change will

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occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven (7) days before the change is to be made. If less than seven (7) days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.

B) The permit shield shall not apply to these changes.

II) SIP-based emissions trading changes. This section does not apply. The SIP does not contain provisions to allow emission trading.

III) Emissions cap-based changes. This section does not apply. The SIP does not contain provisions to allow emission cap based changes.

Off-Permit Changes - 10 CSR 10-6.065(6)(C)9 ~~(Federally and State enforceable).~~

1. Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
2. Compliance with applicable requirements. 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, even if the change is not addressed in or constrained by the permit, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
3. Contemporaneous notice, except insignificant activities. the permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
4. Record of changes. The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
5. Permit shield not applicable. The permit shield shall not apply to these

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changes.

EMISSIONS LIMITATIONS AND STANDARDS

The installation shall comply with each of the following EMISSIONS LIMITATIONS AND STANDARDS. Consult the appropriate sections in the Code of Federal Regulations (CFR) and the Code of State Regulations (CSR) for the full text of the applicable requirements.

I) McDonnell Douglas Corporation
   A) General
      1) *Start-up, Shutdown and Malfunction Conditions*, 10 CSR 10-6.050 ~~(Federally and State enforceable)~~
         a) Emission Limitation: None
         b) Record Keeping Requirement: None
         c) Monitoring Requirement: None
         d) Reporting Requirement: The permittee shall submit the following information to the director not later than 15 days after receipt of the notice of excess emissions from the Missouri DNR.
            (1) Name and location of installation.
            (2) Name and telephone number of person responsible for the installation.
            (3) The identity of the equipment causing the excess emissions.
            (4) The time and duration of the period of excess emissions.
            (5) The cause of the excess emissions.
            (6) The type of air contaminant involved.
            (7) A best estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude.
            (8) The measures taken to mitigate the extent and duration of the excess emissions.
            (9) The measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

      2) *Construction Permits Required*, 10 CSR 10-6.060
         a) Emission Limitation: 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 (5) years without first obtaining a permit from the

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permitting authority under this rule, unless a waiver is obtained from Missouri DNR.

b) Record Keeping Requirement: None
c) Monitoring Requirement: None
d) Reporting Requirement: None

3) *Operating Permits*, 10 CSR 10-6.065
   a) The permittee shall obtain an operating permit for the facility, so long as it has a potential to emit greater than de minimis levels. The term of the operating permit is five years. It shall file for renewal of this operating permit no sooner that 18 months, nor later than six (6) months, prior to the expiration date of this operating permit.
   b) Record Keeping Requirement: The permittee shall retain the most current operating permit issued to this facility on-site and shall immediately make such permit available to any Missouri DNR personnel upon request.
   c) Monitoring Requirement: None
   d) Reporting Requirement: Annual Compliance Certification

4) *Emission Standards for Hazardous Air Pollutants*, 10 CSR 10-6.080, (See 40 CFR part 61 Subpart M-*National Emission Standard for Asbestos*) (~~Federally and State enforceable~~)
   a) Emission Limitation: The permittee shall conduct all asbestos abatement projects in accordance with the registration, certification, notification, and performance requirements set forth in the regulation at 40 Part 61 Subpart M-*National Emission Standard for Asbestos* Sections 61.145, 61.150,61.152 and 61.153.
   b) Record Keeping Requirement: As defined in the regulation at 40 Part 61 Subpart M-*National Emission Standard for Asbestos* Sections 61.145, 61.150 and 61.153 only.
   c) Monitoring Requirement: Any appropriate monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures an Practices standards as defined in the regulations at 40 Part 61 Subpart M-*National Emission Standard for Asbestos.*
   d) Reporting Requirement: As defined in the regulations at 40 Part 61 Subpart M-(61.145, 61.150. and 61.153 only) *National Emission Standard for Asbestos.*

5) *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
   a) Emission Fee: $25.70 per ton of pollutant or the amount

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established by the Missouri Air Conservation Commission under Missouri Air Law 643.079(1) if changed.

b) Record Keeping Requirement: The permittee shall complete and submit an EIQ in accordance with the requirements outlined in this rule.
c) Monitoring Requirement: None
d) Reporting Requirement: April 1 for previous year's emissions (EIQ)

6) *Controlling Emissions During Episodes of High Air Pollution Potential*, 10 CSR 10-6.130 (~~Federally and State enforceable~~)
   a) Emission Limitation: This rule specifies the conditions that establish an air pollution alert (yellow/red), watch or emergency and the associated procedures and emissions reduction objectives for dealing with each.
   b) Record Keeping Requirement: None
   c) Monitoring Requirement: None
   d) Reporting Requirement: The permittee shall submit an appropriate emergency plan if required by the Director.

7) *Circumvention*, 10 CSR 10-6.150 (~~Federally and State enforceable~~)
   a) Emission Limitation: The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceal or dilute an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.
   b) Record Keeping Requirement: Annual DNR inspection reports.
   c) Monitoring Requirement: Periodic DNR inspections/routine surveillance
   d) Reporting Requirement: None

8) *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170 (~~Federally and State enforceable~~)
   a) Emission Limitation: No person may 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 to go beyond the premises of origin in quantities that the particulate matter:
      (1) Remains visible in the ambient air beyond the property line of origin; or

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(2) May be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined by microscopy or other technique proven to be equally accurate and approved by the Director.

b) Record Keeping Requirement: None
c) Monitoring Requirement: None
d) Reporting Requirement: None

9) *Measurement of Emissions of Air Contaminants*, 10 CSR 10-6.180 ~~(Federally and State enforceable)~~

a) Emission Limitation: None
b) Record Keeping Requirement: None
c) Monitoring Requirement: RESPONSIBLE PERSONS TO HAVE TESTS MADE.
The director may require any person responsible for the source of emission of air contaminants to make or have made test 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 conducted by reputable qualified personnel.
DIRECTOR MAY MAKE TESTS.
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.
d) Reporting Requirement: The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10) *Asbestos Abatement Projects - Certification, Accreditation and Business Exemption Requirements*, 10 CSR 10-6.250 (State Enforceable only) ?

a) Emission Limitation: The permittee shall conduct all asbestos abatement projects within the procedures established for Certification, and Accreditation by 10 CSR 10-6.250.
Certification. An individual must receive certification from the department before that individual participates in an asbestos abatement project operating in Missouri according to section (3). This certification is annually renewable. Certification as an AHERA inspector, AHERA management planner and AHERA

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project designer apply to AHERA-related projects.

b) Record Keeping Requirement: Any appropriate record keeping to demonstrate compliance with Certification, and Accreditation standards.

c) Monitoring Requirement: Any appropriate monitoring to demonstrate compliance with Certification, and Accreditation standards.

d) Reporting Requirement: None

11) *Open Burning Restrictions*, 10 CSR 10-5.070 ~~(Federally and State enforceable)~~

a) Emission Limitation: The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning. Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.

b) Record Keeping Requirement: Maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

c) Monitoring Requirement: None

d) Reporting Requirement:

(1) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:

(a) The name, address and telephone number of the person submitting the application;

(b) The type of business or activity involved;

(c) A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;

(d) The schedule of burning operations;

(e) The exact location where open burning will be used to dispose of the trade wastes;

(f) Reasons why no method other than open burning is feasible; and

(g) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.

(2) Upon approval of the application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt the permittee from the provisions of any other law, ordinance or

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regulation.

12) *Restriction of Emission of Visible Air Contaminants,* 10 CSR 10-5.090 (~~Federally and State enforceable~~)
   a) Emission Limitation: The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant of an opacity greater than 20%, unless it is an existing source which emits less than 25 lbs/hr PM. If it is an existing source, which emits less than 25 lbs/hr, then the permittee shall not discharge into the ambient air any air contaminant of an opacity greater than 40%. A source with a 20% limit may emit air contaminants with an opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes.
   b) Record Keeping Requirement: The permittee shall maintain records of the visual inspections plus any records required to be kept as a result of an official Method 9 opacity test.
   c) Monitoring Requirement: The permittee shall conduct visual observations of emission units once each calendar month. Absence of visible emissions will demonstrate compliance. If visible emissions are documented, a certified opacity reader will perform a visible emissions determination using EPA Reference Method 9, *Visual Determination of the Opacity of Emissions from Stationary Sources* to determine whether emissions exceed the opacity limits set forth above.
   d) Reporting Requirement: None
   e) Schedule of Compliance: The permittee at the effective date of 10 CSR 10-5.090 met the requirements of this rule and was not required to submit a compliance plan.
   f) Progress Report: None

13) *Control of Odors in the Ambient Air,* 10 CSR 10-5.160{State enforceable only}
   a) Emission Limitation:
      (1) No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:
         i) Residential, recreational, institutional, retail sales, hotel or educational premises.
         ii) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
         iii) Premises other than those in paragraphs 1)(A)1 and 2 when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

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

b) Record Keeping Requirement: None
c) Monitoring Requirement: None
d) Reporting Requirement: None

14) *Control of VOC Emissions from Traffic Coatings;* 10 CSR 10-5.450 (State ~~only~~ enforceable ~~until approved by EPA)~~
a) Emission Limitation: The VOC content of traffic coatings may not exceed 1.26 lbs/gallon.
b) Record Keeping Requirement: Material Safety Data Sheets (MSDS) or purchasing records showing the VOC content of the traffic coatings used will be kept.
c) Monitoring Requirement: None
d) Reporting Requirement: None

B) Building Fugitives-Emission Unit Specific Applications
1) EIQ Point Number BF-STC-03; Emission Unit Number BF-STC-03 Facility Wide Cleaning/Hand-Wipe Activities (Aerospace Production Only) 10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*, 40 CFR Part 63 Subpart GG Sections 63.743, 63.744, 63.749, 63.750, 63.752 and 63.753, Aerospace NESHAP ~~(Federally and State enforceable)~~
a) Emission Limitations:

Hand-wipe cleaning

1. Each owner or operator of a new or existing affected hand-wipe cleaning operation covered by 40 CFR Part 63, Subpart GG, shall use cleaning solvents that meet one of the following requirements:
   a. Meet (1) one of the composition requirements in section 63.744 (Table 1) of the Aerospace NESHAP.
   b. Have a composite vapor pressure of 45 mm Hg or less at 20° Celsius. (68° Fahrenheit)
   c. Demonstrate that the volume of hand-wipe cleaning solvents used in affected cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be established as part of an approved alternative plan administered by the

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State.

2. The following cleaning operations are exempt from the requirements of ii) Hand-wipe cleaning:
   a. Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;
   b. Cleaning during the manufacture, assembly, installation, maintenance or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine, etc.);
   c. Cleaning and surface activation prior to adhesive bonding;
   d. Cleaning of electronic parts and assemblies containing electronic parts;
   e. Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to air heat exchangers and hydraulic fluid systems;
   f. Cleaning of fuel cells, fuel tanks, and confined spaces;
   g. Surface cleaning of solar cells, coated optics, and thermal control surfaces;
   h. Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;
   i. Cleaning of metallic and non-metallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
   j. Cleaning of aircraft transparencies, polycarbonate, or glass substrates; and
   k. Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing.
   l. Cleaning operations, using nonflammable liquids, conducted within five (5) feet of energized electrical systems. Energized electrical systems means AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections.

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m. Cleaning operations identified as essential uses under the Montreal Protocol for which the Administer has allocated essential use allowances or exemptions in 40 CFR 82.4.

b) Operational Limitations:

Housekeeping measures

Permittee shall institute and carry out a housekeeping program that requires the following:

1. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning ~~in aerospace production~~ in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning are exempt from this requirement.
2. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
3. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

c) Record Keeping Requirement:

1. Each owner or operator of a new or existing cleaning operation shall record the information specified below:
   a. The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
   b. For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements or for semi-aqueous cleaning solvents used for flush cleaning operations:
      i. The name of each cleaning solvent used
      ii. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements
2. Annual records of the volume of each solvent used, as

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determined from facility purchase records or usage records.

3. For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements, but does comply with the vapor pressure requirement:
   a. The name of each cleaning solvent used
   b. The composite vapor pressure of each cleaning solvent used
   c. All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent.
   d. The amount (in gallons) of each cleaning solvent used each month at each operation.
4. For each cleaning solvent used for exempt hand-wipe cleaning operations:
   a. The identity and amount (in gallons) of each cleaning solvent used each month at each operation.
   b. A list of the exempt processes to which the cleaning operation applies

d) Monitoring Requirement:

- Compliance with the hand-wipe cleaning solvent approved composition list specified in § 63.744(b)(1) for hand-wipe cleaning solvents shall be demonstrated using data supplied by the manufacturer of the cleaning solvent. The data shall identify all components of the cleaning solvent and shall demonstrate that one of the approved composition definitions is met. (§63.750(a))
- The composite vapor pressure of hand-wipe cleaning solvents used in a cleaning operation subject to this subpart shall be determined as follows: (§63.750(b))
  1. For single-component hand-wipe cleaning solvents, the vapor pressure shall be determined using MSDS or other manufacturer's data, standard engineering reference texts, or other equivalent methods. (§63.750(b)(1))
  2. The composite vapor pressure of a blended hand-wipe solvent shall be determined by quantifying the amount of each organic compound in the blend using manufacturer's supplied data or a gas chromatographic analysis in accordance with ASTM E 260–91 (incorporated by reference as specified in § 63.14 of subpart A of this part) and by calculating the composite vapor pressure of the solvent by

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summing the partial pressures of each component. The vapor pressure of each component shall be determined using manufacturer's data, standard engineering reference texts, or other equivalent methods. The following equation shall be used to determine the composite vapor pressure: (§63.750(b)(2))

$$PP_c = \sum_{i=1}^{n} \frac{(W_i)(VP_i)/MW_i}{\frac{W_w}{MW_w} + \sum_{e=1}^{n} \frac{W_e}{MW_e} + \sum_{i=1}^{n} \frac{W_i}{MW_i}}$$

Where:

W_i = Weight of the "i"th VOC compound, grams.
W_w = Weight of water, grams.
W_e = Weight of non-HAP, nonVOC compound, grams.
MW_i = Molecular weight of the "i"th VOC compound, g/g-mole.
MW_w = Molecular weight of water, g/g-mole.
MW_e = Molecular weight of exempt compound, g/g-mole.
PP_c = VOC composite partial pressure at 20 °C, mm Hg.
VP_i = Vapor pressure of the "i"th VOC compound at 20 °C, mm Hg.(§63.750(b))

e) Reporting Requirement:
   1. Each owner or operator of a cleaning operation shall submit the following information:
      i. Semiannual reports occurring every six (6) months from the date of the notification of compliance status that identify:
      ii. Any instance where a non-compliant cleaning solvent is used for a nonexempt hand-wipe cleaning operation.
      iii. A list of any new cleaning solvents used for hand-wipe cleaning in the previous six (6) months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements.
      iv. If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.
      v. All deviations of the housekeeping measures of 40

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CFR Part 63, Subpart GG (Operational Limitations 1 through 3) must be reported to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 at least semi-annually. All deviations from the housekeeping measures must be included in the semi-annual monitoring report and the annual compliance certification.

C) Cold Cleaners/Spray Gun Cleaners-Emission Unit Specific Applications EIQ Point Number CC-STC-01; Emission Unit Number CC-STC-01 Spray Gun Cleaning Operations (Aerospace Production) EIQ Point Number CC-STC-01; Emission Unit Number CC-598-05,

1) 10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations* , 40 CFR Part 63 Subpart GG, Aerospace NESHAP (Federally and State enforceable)

a) Emission Limitations:

i) Housekeeping measures.

1. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in closed containers (such as plastic bags or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning are exempt from this requirement.
2. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
3. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

ii) Spray gun cleaning.

1. Each owner or operator of a new or existing spray gun cleaning operation shall use one or more of the techniques, or their equivalent, specified in this section. Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below de minimis levels specified in 63.741(f) are exempt from these

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requirements.

a. Enclosed System. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the cleaning solvent through the gun. If leaks are found during the monthly inspection required in 63.751(a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
b. Nonatomized cleaning. Clean the spray gun 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. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
c. Disassembled spray gun cleaning. Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
d. Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

b) Record Keeping Requirements:
   i) A record of all leaks from enclosed spray gun cleaners that includes for each leak found:
      1. Source identification
      2. Date leak was discovered
      3. Date leak was repaired
      4. Monitoring Requirements:
   ii) Each owner or operator using an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks associated with each enclosed spray gun cleaner system at least once per month. Each inspection shall occur while the system is in operation.

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c) Reporting Requirements:
   i) Each owner or operator of a cleaning operation shall submit the following information:
      1. Semiannual reports occurring every six (6) months from the date of the initial notification of compliance status.
      2. If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.

D) Construction Permit Number 0396-014 Special Conditions for EIQ Point Number CC-STC-01; Emission Unit Number CC-598-02 and EIQ Point Number CC-STC-01; Emission Unit Number CC-598-03
   Note: These cold cleaners are now used as electronic parts cleaners which are exempted from 10 CSR 10-5.300.
   a) The total combined emissions of VOCs from the operation of the two (2) new, cold cleaners shall be limited to 12.2 tons in any consecutive 12-month period.
   b) Records shall be kept for the most recent five (5) year period of operation that shows the tons of VOC emitted from the two (2) cold cleaners. All emissions shall be calculated using material balance. The records shall be made available to the DNR personnel upon request.
   c) The source shall report to the APCP, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten (10) days after the end of each month, if the 12-month cumulative total from b) above show that the source exceeded the limitation of a) above.

E) Coating Lines- Spray Booth (Aerospace Production) Emission Unit Specific Applications
   EIQ point number CL-STC-01; Emission Unit Number SB-598-01
   EIQ point number CL-STC-01; Emission Unit Number SB-598-02,
   EIQ point number CL-STC-01; Emission Unit Number SB-598-03,
   EIQ point number CL-STC-01; Emission Unit Number SB-598-04,
   EIQ point number CL-STC-01; Emission Unit Number SB-598-05,
   EIQ point number CL-STC-01; Emission Unit Number SB-599-01

   1) Construction Permit Number 0396-022 Special Permit Conditions
      a) Emission Limitation: The permittee may not emit more than 77.95 tons of VOC in any consecutive 12 month period from the spray booths, coating ovens, vapor degreaser, and miscellaneous equipment covered by this permit.
      b) Record Keeping Requirement: Records shall contain both monthly

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and 12-month cumulative totals.

c) Monitoring Requirements: None

d) Reporting Requirements: The permittee shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the 77.95 tons emission limit demonstrated by the appropriate record keeping forms.

2) 10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations* , 40 CFR Part 63 Subpart GG, Aerospace NESHAP ~~(Federally and State enforceable~~)

Note: The usage of specialty coatings as defined in 40 CFR 63 Subpart GG are not covered by this rule.

a) Emission Limitations:
   (1) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pound per gallon (VOC content is measured less water and exempt solvent) as applied.
   (2) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pound per gallon (VOC content is measured less water and exempt solvent) as applied.
   (3) Averaging (as described in 63.745(e)(2) & 750 (d)) can be used to meet the Primer and Topcoat limits.
   (4) Inorganic HAP Control. The Airflow shall be exhausted through a dry particulate filter system that meets the limits in 40 CFR 63.745 (g) by Method 319.

b) Record Keeping Requirement:
   (1) Primers and Topcoats
      - Record the name and VOC content as applied of each primer and topcoat used in production areas.
      - For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used. If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).
   (2) Inorganic HAP Control. Record once per shift of operation in production booths the pressure drop across the system.

c) Monitoring Requirement: For dry filters, install differential pressure gauge across filter bank. Continuously monitor the pressure drop and take corrective action if pressure drop falls outside the manufacturer's recommendation.

d) Reporting Requirement:
   (1) Every six (6) months: (Report) all times when a primer or

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topcoat application was not immediately shut down when the pressure drop across a dry particulate filter was outside limit(s) as specified by the filter or booth manufacturer. If the operations have been in compliance for the semiannual period, (provide) a statement that the operations have been in compliance with the applicable standards.

(2) Annually: (Report) the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer.

3) *Restriction of Emission of Particulate Matter from Industrial Processes,* 10 CSR 10-5.050 (2)(A) (~~Federally and State enforceable~~)
   a) Emission Limitation: No person shall cause, suffer, allow or permit the emission of particulate matter in any one (1) hour to exceed the concentration shown in Table II of the rule for the process weight rate associated with that source.
   b) Record Keeping Requirement: The one-time compliance calculation based on the particulate concentration of particulates being emitted from each booth must be kept as a record.
   c) Monitoring Requirement: None
   d) Reporting Requirement: The permittee shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-5.050.

4) *Control of Emissions from Industrial Surface Coating Operations,* 10 CSR 10-5.330 (4) (B) (~~Federally and State enforceable~~)
   a) Emission Limitation: The permittee shall not emit or discharge to the atmosphere any VOC from any surface coating operation in excess of section 4 table B.
   b) Record Keeping Requirement: Follow the appropriate record keeping requirements detailing specific VOC sources as necessary for the director to determine daily compliance. These records may include:
      (1) Daily records of the type and the quantity of coatings used daily;
      (2) The coating manufacturer's formulation data for each coating on forms provided or approved by the director;
      (3) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
      (4) All test results to determine capture and control devices efficiencies, TEs and coating makeup;
      (5) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;

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(6) Daily records of the quantity of pieces or materials coated daily; and
(7) Any additional information pertinent to determining compliance.

c) Monitoring Requirement: Follow all applicable record keeping requirements.
d) Reporting Requirement: Follow the appropriate reporting requirements per section 6. Records shall be made available to the director upon request.

F) Bench Spray Booth (Aerospace Production) (Non-Aerospace NESHAP primers/topcoats)
EIQ point number CL-STC-01; Emission Unit Number SB-598-06,
EIQ point number CL-STC-01; Emission Unit Number SB-598-07,
1) 10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations* , 40 CFR Part 63 Subpart GG, Aerospace NESHAP (Federally and State enforceable)

Note: The usage of specialty coatings as defined in 40 CFR 63 Subpart GG are not covered by this rule.

a) Emission Limitations: (For covered aerospace activities only)
(1) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pound per gallon (VOC content is measured less water and exempt solvent) as applied.
(2) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pound per gallon (VOC content is measured less water and exempt solvent) as applied.
(3) Averaging (as described in 63.745(c) & 63.750(d)) can be used to meet the Primer and Topcoat limits.
(4) Inorganic HAP Control. The Airflow shall be exhausted through a dry particulate filter system that meets the limits in 40 CFR 63.745 (g) Method 319.

b) Record Keeping Requirement: (For covered aerospace activities only)
(1) Primers and Topcoats
- Record the name and VOC content as applied of each primer and topcoat used in production areas.
- For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used.
- If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).

(2) Inorganic HAP Control. Record once per shift of operation in

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production booths the pressure drop across the system.

c) Monitoring Requirement: (For covered aerospace activities only) For dry filters, install differential pressure gauge across filter bank. Continuously monitor the pressure drop and take corrective action if pressure drop falls outside the manufacturer's recommendation.

d) Reporting Requirement: (For covered aerospace activities only)

(1) Every six months: (Report) all times when a primer or topcoat application was not immediately shut down when the pressure drop across a dry particulate filter was outside limit(s) as specified by the filter or booth manufacturer. If the operations have been in compliance for the semiannual period, (provide) a statement that the operations have been in compliance with the applicable standards.

(2) Annually: (Report) the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer.

2) *Restriction of Emission of Particulate Matter from Industrial Processes,* 10 CSR 10-5.050 (2)(A) {Federally and State enforceable}

a) Emission Limitation: No person shall cause, suffer, allow or permit the emission of particulate matter in any one (1) hour to exceed the concentration shown in Table II of the rule for the process weight rate associated with that source.

b) Record Keeping Requirement: The one-time compliance calculation based on the particulate concentration of particulates being emitted from each booth must be kept as a record.

c) Monitoring Requirement: None

d) Reporting Requirement: None

3) *Control of Emissions from Industrial Surface Coating Operations,* 10 CSR 10-5.330 (4) (B) (Federally and State enforceable)

a) Emission Limitation: The permittee shall not emit or discharge to the atmosphere any VOC from any surface coating operation in excess of section 4 table B.

b) Record Keeping Requirement: Follow the appropriate record keeping requirements detailing specific VOC sources as necessary for the director to determine daily compliance. These records may include:

(1) Daily records of the type and the quantity of coatings used daily;

(2) The coating manufacturer's formulation data for each coating on forms provided or approved by the director;

(3) Daily records of the type and quantity of solvents for coating,

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thinning, purging and equipment cleaning used;

(4) All test results to determine capture and control devices efficiencies, TEs and coating makeup;

(5) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;

(6) Daily records of the quantity of pieces or materials coated daily; and

(7) Any additional information pertinent to determining compliance.

c) Monitoring Requirement: Follow all applicable record keeping requirements.

d) Reporting Requirement: The permittee shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-5.330.

G) Mixing Touch-Up Paint Booth (Aerospace Production) (Non-Aerospace NESHAP primers/topcoats)
EIQ point number CL-STC-01; Emission Unit Number MB-598-01,
Conformal Coating Booth (Aerospace Production)
EIQ point number CL-STC-01; Emission Unit Number SB-598-08

1) Construction Permit Number 0396-022 Special Permit Conditions

a) Emission Limitation: The permittee may not emit more than 77.95 tons of VOC in any consecutive 12 month period from the spray booths, coating ovens, vapor degreaser, and miscellaneous equipment covered by this permit.

b) Record Keeping Requirement: Records shall contain both monthly and 12-month cumulative totals.

c) Monitoring Requirements: None

d) Reporting Requirements: The permittee shall report to APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the 77.95 tons emission limit demonstrated by the appropriate record keeping forms.

2) 10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations* , 40 CFR Part 63 Subpart GG, Aerospace NESHAP (Federally and State enforceable)

Note: The usage of specialty coatings as defined in 40 CFR 63 Subpart GG are not covered by this rule.

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a) Emission Limitations: (For covered aerospace activities only)
   (1) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pound per gallon (VOC content is measured less water and exempt solvent) as applied.
   (2) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pound per gallon (VOC content is measured less water and exempt solvent) as applied.
   (3) Averaging (as described in 63.745(c) & 63.750(d) can be used to meet the Primer and Topcoat limits.
   (4) Inorganic HAP Control. The Airflow shall be exhausted through a dry particulate filter system that meets the limits in 40 CFR 63.745 (g) by Method 319.

b) Record Keeping Requirement: (For covered aerospace activities only)
   (1) Primers and Topcoats
      - Record the name and VOC content as applied of each primer and topcoat used in production areas.
      - For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used.
      - If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).
   (2) Inorganic HAP Control. Record once per shift of operation in production booths the pressure drop across the system.

c) Monitoring Requirement: (For covered aerospace activities only) For dry filters, install differential pressure gauge across filter bank. Continuously monitor the pressure drop and take corrective action if pressure drop falls outside the manufacturer's recommendation.

d) Reporting Requirement: (For covered aerospace activities only)
   (1) Every six (6) months: (Report) all times when a primer or topcoat application was not immediately shut down when the pressure drop across a dry particulate filter was outside limit(s) as specified by the filter or booth manufacturer. If the operations have been in compliance for the semiannual period, (provide) a statement that the operations have been in compliance with the applicable standards.
   (2) Annually: (Report) the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer.

3) *Restriction of Emission of Particulate Matter from Industrial Processes,* 10 CSR 10-5.050 (2)(A) (Federally and State enforceable)

a) Emission Limitation: No person shall cause, suffer, allow or permit the emission of particulate matter in any one (1) hour to exceed the

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concentration shown in Table II of the rule for the process weight rate associated with that source.

b) Record Keeping Requirement: The one-time compliance calculation based on the particulate concentration of particulates being emitted from each booth must be kept as a record.
c) Monitoring Requirement: None
d) Reporting Requirement: None

4) *Control of Emissions from Industrial Surface Coating Operations*, 10 CSR 10-5.330 (4) (B) (Federally and State enforceable)
   a) Emission Limitation: The permittee shall not emit or discharge to the atmosphere any VOC from any surface coating operation in excess of section 4 table B.
   b) Record Keeping Requirement: Follow the appropriate record keeping requirements detailing specific VOC sources as necessary for the director to determine daily compliance. These records may include:
      (1) Daily records of the type and the quantity of coatings used daily;
      (2) The coating manufacturer's formulation data for each coating on forms provided or approved by the director;
      (3) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
      (4) All test results to determine capture and control devices efficiencies, TEs and coating makeup;
      (5) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
      (6) Daily records of the quantity of pieces or materials coated daily; and
      (7) Any additional information pertinent to determining compliance.
   c) Monitoring Requirement: Follow all applicable record keeping requirements.
   d) Reporting Requirement: The permittee shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of 10 CSR 10-5.330

H) Combustion Sources-Emission Unit Specific Applications
EIQ Point Number CS-STC-01; Emission Unit Number CS-STC-01A, Natural Gas Waste Liquid Reduction System, NEW: Installed after (February 15, 1979) Heat input rating 10.00MMBTU/hr

1) *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating,* 10 CSR 10-5.030 (3)(B)2 (Federally and State enforceable)

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a) Emission Limitation: The permittee shall not emit particulate matter in excess of 0.18 pounds per million BTU of heat input.
b) Record Keping Requirement: The permittee shall maintain an accurate record of the emission rate of particulate matter emitted into the atmosphere from this emission unit. The records shall consist of the emission factor for particulate matter from AP42 compared to the emission limit. Also, the records shall demonstrate how the emission limit is calculated. These records shall be made available immediately for inspection to the DNR personnel upon request.
c) Monitoring Requirement: None. (Compliance is demonstrated by record keeping requirement above. The throughput will not affect whether or not the unit meets the emission limit.)
d) Reporting Requirement: None

2) *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260 (10 CSR 10-6.260(4) is State enforceable only)
   a) Emission Limitation:
      i) Section (4)
         1. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those in 10 CSR 10-6.010, *Ambient Air Quality Standards.*
      ii) Section (5)
         1. None
   b) Record Keeping Requirement: None
   c) Monitoring Requirement: None (The facility is located in an attainment area for sulfur compounds.)
   d) Reporting Requirement: None

I) Combustion Sources-Emission Unit Specific Applications

EIQ Point No.	Emission Unit No.	MMBTU/hr	Fuel
CS-598-01	CS-598-01	20.92	NG/ Fuel Oil Back-up
CS-598-01	CS-598-02	20.92	NG/ Fuel Oil Back-up
CS-STC-01	CS-598-03	6.275	NG/ Fuel Oil Back-up
CS-STC-01	CS-598-04	6.275	NG/ Fuel Oil Back-up
CS-STC-01	CS-599-01	5.23	NG/ Fuel Oil Back-up

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CS-STC-01	CS-599-02	5.23	NG/ Fuel Oil Back-up

All are NEW Installed after February 15.1979,

1) *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating,* 10 CSR 10-5.030 (3)(B)2 (Federally and State enforceable)
   a) Emission Limitation: The permittee shall not emit particulate matter in excess of 0.18 pounds per million BTU of heat input.
   b) Record Keeping Requirement: The permittee shall maintain an accurate record of the emission rate of particulate matter emitted into the atmosphere from this emission unit. These records shall consist of the PM emission factor for the appropriate fuel from AP42 compared to the limit set for this source. These records shall be made available immediately for inspection to the DNR personnel upon request.
   c) Monitoring Requirement: None. (Compliance is demonstrated by record keeping requirement above. The throughput will not affect whether or not the unit meets the emission limit.)
   d) Reporting Requirement: None
2) *Restriction of Emission of Sulfur Compounds,* 10 CSR 10-6.260 (10 CSR 10-6.260(4) State-enforceable only)
   a) Emission Limitation:
      i) Section (4)
         1. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those in 10 CSR 10-6.010, *Ambient Air Quality Standards.*
      ii) Section (5)
         1. Fuel oil burned in these units must be no greater than 2% from October through March and no greater than 4% for the rest of the year.
         2. The only other fuel burned in this unit is Natural Gas, which has no requirements placed on it in this section. In addition, it is well below the 2.3 lb/MMBTU exemption per AP-42 (0.0006 lb/MMBTU for natural gas combustion)
   b) Record Keeping Requirement: The permittee shall maintain an accurate record of the sulfur content of fuel oil as purchased. These records shall be made available immediately for inspection to the DNR personnel upon request.
   c) Monitoring Requirement: None
   d) Reporting Requirement: None

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J) Depainting Operations-Emission Unit Specific Applications
EIQ Point Number MC-STC-01; Emission Unit Number MC-STC-01
Facility-Wide Chemical Depainting
EIQ Point Number None: Emission Unit Number DP-STC-01
Facility-Wide Non-Chemical Depainting

1) 10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations* , 40 CFR Part 63 Subpart GG, Aerospace NESHAP (Federally and State enforceable) Emission Limitations: The air stream from the depainting process (plastic media blasting) will pass through a baghouse.
   a) Record Keeping Requirement: List the parts normally removed before depainting. List the name and type of equipment used for depainting and for periods of malfunction, what malfunctioned and the date of the malfunction. The method used to depaint during the malfunction period. Record dates that this method was began and discontinued and the date the malfunction was corrected.
   b) Monitoring Requirement: None (Baghouse not subject to 40 CFR Part 63.746 b 4 iii (A, B, C and D).
   c) Reporting Requirement: For periods of malfunction: The method and description of malfunction and date. The method used to depaint and the dates these methods began and discontinued and the date the malfuction was corrected. Submit a list of new and discontinued missiles depainted over the last six (6) months and a list of parts normally removed for depainting of that new model of missile. If the operation has been in compliance, every six (6) months a statement that the depainting operation has been in compliance with the applicable standards.

K) Emergency Generators-Emission Unit Specific Applications
EIQ Point Number None; Emission Unit Number EG-STC-01
Facility Wide Emergency Generators
All emergency generators were installed after March 24, 1967. All are new under 10 CSR 10-6.260

EG-508-01	Natural gas fired	33 HP
EG-509-01	Natural gas fired	Currently Out of Service (Gas line is capped)
EG-550-01	Diesel fired	200 HP
EG-598-01	Natural gas fired	150 HP
EG-598-02	Natural gas fired	200 HP
EG-598-03	Fuel oil fired	465 HP
EG-599-01	Natural gas fired	235.7 HP

2) *Emission of Visible Air Contaminants From Internal Combustion Engine,*

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10 CSR 10-5.180 (Federally and State enforceable)

a) Emission Limitation: No person shall cause or permit the emission of visible air contaminates from any internal combustion engine for more than ten (10) consecutive seconds at any one(1) time. Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements of this regulation, the provisions of this regulation shall not apply.
b) Record Keeping Requirement: None
c) Monitoring Requirement: None
d) Reporting Requirement: None

3) *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260 {10 CSR 10- 6.260 (4) is state-enforceable only)
   a) Emission Limitation:
      i) New Sources: No person shall cause or permit the emission into the atmosphere from any existing source operation gases containing more than 500 parts per million by volume (ppmv) of sulfur dioxide or more than 35 milligrams (mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3) hour time period
      ii) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010, *Ambient Air Quality Standards.*
   b) Record Keeping Requirement: The permittee shall maintain an accurate record of the sulfur content of fuel oil receipts. The records should demonstrate that no fuel purchased for use in the generators was of a sulfur content greater than 0.5 percent by weight. These records shall be made available immediately for inspection to the DNR personnel upon request.
   c) Monitoring Requirement: None, as long as the weight percent sulfur content of the fuel oil used in the emergency generators is 0.5% sulfur by weight or less the emergency generators will be deemed to be in compliance.
   d) Reporting Requirement: None

L) Facility wide -Emission Unit Specific Applications
EIQ Point Number None; Emission Unit Number HW-STC-01
Facility Wide HAP Containing Wastes Generated from Aerospace Activities
Not Subject to RCRA

1) 10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

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, 40 CFR Part 63 Subpart GG, Aerospace NESHAP (Federally and State enforceable)

a) Emission Limitations: All waste that contains HAP, but is not subject to RCRA standards, shall be handled and transferred to or from containers, vats, vessels, and piping systems in such a manner that minimizes spills.
b) Record Keeping Requirement: None
c) Monitoring Requirement: None
d) Reporting Requirement: None

M) Fuel Storage Tanks -Emission Unit Specific Applications
EIQ Point Number ST-STC-01; Emission Unit Number ST-506-20
Gasoline Underground Storage Tank (1000gallons)

1) *Control of Petroleum liquid Storage, Loading and Transfer,* 10 CSR 10-5.220 (5) (Federally and State enforceable)
   a) Emission Limitation: All gasoline storage tank with a capacity greater than 500 gallons shall be equipped with a submerged fill pipe, vapor-tight caps and fittings vented via conduit, and Stage I Vapor recovery system with 90% capture efficiency. (ST-506-20 does not have a capacity of more than 1,000 gallons)
   b) Record Keeping Requirement: The permittee must demonstrate that the facility maintains a system of record keeping that meets the staff director's requirement. Subsection (5)(D) of 10 CSR 10-5.220 specifically requires that delivery records be kept at the facility. Retention of delivery records at the facility will be limited to the four (4) most recent receipts of each grade of product.
   c) Monitoring Requirement: None
   d) Reporting Requirement: None

2) *Control of Gasoline Reid Vapor Pressure*; 10 CSR 10-5.443 (State enforceable only until approved by EPA)
   a) Emission Limitation: Selling, dispensing, etc. gasoline with an RVP exceeding 7.0 psi is prohibited between 6/1 and 9/15 of each year, unless the gasoline is a blend with at least 9% to 10% ethyl alcohol by volume, in which case the RVP may not exceed 8.0 psi during the same period. By only buying compliant gasoline from 6/1 through 9/15 each year the tank will be deemed to be in compliance.
   b) Record Keeping Requirement: Records shall be kept of the documents accompanying all gasoline shipments to this tank between 6/1 and 9/15. These records will indicate the Reid vapor pressure of the gasoline.
   c) Monitoring Requirement: None

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d) Reporting Requirement: None

3) 40 CFR Part 80.22(j), *Regulation of Fuels and Fuel Additives* (Federally enforceable only)
   a) Emission Limitations: Fuel flow rate from nozzle into motor vehicles shall not exceed 10 gal/min.
   b) Record Keeping Requirement: As defined in the regulation.
   c) Monitoring Requirement: As defined in the regulation.
   d) Reporting Requirement: None

N) Fuel Storage Tanks -Emission Unit Specific Applications
EIQ Point Number ST-STC-01; Emission Unit Number ST-598-01
Gasoline Aboveground Storage Tank (500 gallons)
1) *Control of Gasoline Reid Vapor Pressure*; 10 CSR 10-5.443 (State enforceable only until approved by EPA)
   a) Emission Limitation: Selling, dispensing, etc. gasoline with an RVP exceeding 7.0 psi is prohibited between 6/1 and 9/15 of each year, unless the gasoline is a blend with at least 9% to 10% ethyl alcohol by volume, in which case the RVP may not exceed 8.0 psi during the same period. By only buying compliant gasoline from 6/1 through 9/15 each year the tank will be deemed to be in compliance.
   b) Record Keeping Requirement: Records shall be kept of the documents accompanying all gasoline shipments to this tank between 6/1 and 9/15. These records will indicate the Reid vapor pressure of the gasoline.
   c) Monitoring Requirement: None
   d) Reporting Requirement: None

O) Fuel Storage Tanks -Emission Unit Specific Applications
EIQ Point Number None; Emission Unit Number ST-598-21
Fuel oil #2, Underground Storage Tank (25,000gallons)
1) *New Sources Performance Regulations*, 10 CSR 10-6.070, 40 CFR Part 60,Subpart Kb, 60.116(b), Volatile Organic Liquid Storage NSPS (Federally and State enforceable)
   a) Emission Limitations: None
   b) Record Keeping Requirement: Tank dimensions and calculated capacity shall be kept for the life of the tank and as defined in 60.115(b)
   c) Monitoring Requirement: As defined in 60.116(b).
   d) Reporting Requirement: None

P) Vapor Degreasers -Emission Unit Specific Applications

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EIQ Point Number VD-598-01; Emission Unit Number VD-598-01
Open Top Vapor Degreaser

1) Construction Permit Number 0396-022 Special Permit Conditions
   a) Emission Limitation: The permittee may not emit more than 77.95 tons of VOC in any consecutive 12 month period from the spray booths, coating ovens, vapor degreaser, and miscellaneous equipment covered by this permit.
   b) Record Keeping Requirement: Records shall contain both monthly and 12-month cumulative totals.
   c) Monitoring Requirements: None
   d) Reporting Requirements: The permittee shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the 77.95 tons emission limit demonstrated by the appropriate record keeping forms.

2) *Maximum Available Control Technology Regulations*, 10 CSR 10-6.075, 40 CFR Part 63, Subpart T, Halogenated Solvent Cleaning NESHAP (Federally and State enforceable)
   a) Emission Limitations: Use the three (3)-month rolling average compliance method. Emissions shall not exceed 150kg per m^2 of solvent/air interface per month over a three (3)-month averaging period.
   b) Record Keeping Requirement: The following records shall be maintained for five (5) years; dates and amounts of solvent added to each unit, solvent composition of wastes as determined using the procedure listed in 63.465(c)(2), and calculation sheets showing the three (3)-month rolling average results.
   c) Monitoring Requirement: These requirements only refer to the equipment standard compliance method; measure temperature at center of air blanket weekly and record results (must be no greater than 30% of solvent's boiling point), visually inspect cover monthly and record results, and check hoist speed monthly to verify it is less than 11 feet per minute and record results.
   d) Reporting Requirement:
      i) Initial Statement of Compliance – due within 150 days of NESHAP or startup, whichever is later.
      ii) Solvent Emission Report – due by February 1st of the year following the one for which the report is being made.
      iii) Exceedance Report – delivered by the 30th day following the end of each calendar half or quarter. The latter is required if an exceedance has previously occurred
   e) Alternate Compliance Method – Equipment Standard. The

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equipment standards as stated in 40 CFR Part 63, Subpart T as alternate standards, may be used to show compliance instead of those listed above. If one of the alternate standards is used the monitoring, record Keeping and reporting requirements listed in the regulation, for the standard chosen, will be followed.

3) *Control of Emission from Solvent Metal Cleaning,* 10 CSR 10-5.300
   a) Emission Limitation:
      1. Each open-top vapor degreaser shall have a cover which will prevent the escape of solvent vapors from the degreaser while in the closed position.
      2. The design of the cover shall be such that it can be easily operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
      3. Each open-top vapor degreaser shall be equipped with a vapor level safety thermostat with a manual reset, which shuts off the heat source when the vapor level rises above the cooling or condensing coil or equipped with an equivalent safety device approved by the director.
      4. Each open-top vapor degreaser with an air/vapor interface over 10 ¾ square feet shall be equipped with at least one (1) of the following control devices:
         A) A freeboard ratio of at least 0.75;
         B) A refrigerated chiller.
         C) An enclosed design (the cover or door opens only when the dry part actually is entering or exiting the degreaser)
         D) A carbon adsorption system with ventilation of at least 50 cubic feet per minute per square foot of air vapor area when the cover is open and exhausting less than 25 parts per million of solvent by volume averaged over one (1) complete adsorption cycle as measured using the reference method specified at 10 CSR 10-6.030 (14) (A); or
         E) A control system with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65% and prior approval by the director.
      5. A permanent conspicuous label summarizing the opening procedures shall be affixed to the equipment.

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6. Operating procedures:
   A) The cover shall be kept closed at all times except when processing workloads through the degreaser.
   B) Solvent carry-out shall be minimized in the following ways:
      i. Parts shall be racked, if practicable, to allow full drainage;
      ii. Parts shall be moved in and out of the degreaser at less than 11 feet per minute;
      iii. Workload shall remain in the vapor zone at least 30 seconds or until condensation ceases;
      iv. Pools of solvent shall be removed from cleaned parts before removing parts from the degreaser freeboard area; and
      v. Cleaned parts shall be allowed to dry within the degreaser freeboard area for at least 15 seconds or until visibly dry, whichever is longer.
   C) Porous or absorbent materials such as cloth, leather, wood, or rope shall not be degreased.
   D) If workloads occupy more than half of the degreaser's open-top area, rate of entry and removal shall not exceed five (5) feet per minute.
   E) Spray shall never extend above vapor level.
   F) Whenever an open-top vapor degreaser fails to perform within the operating parameters established for it by this rule, the unit shall be shut down immediately and secured. It shall remain shut down until trained service personnel are able to restore operation within the established parameters.
   G) Solvent leaks shall be repaired immediately or the degreaser will be shut down and the leaks secured until they can be more permanently repaired.
   H) Ventilation exhaust shall not exceed 65 cubic feet per minute per square foot of degreaser open area unless proof is submitted that it is necessary to meet OSHA requirements. Fans shall not be used near the degreaser opening.
   I) Water shall not be visually detectable in solvent exiting the water separator.
   J) Any waste material removed from an open-top vapor degreaser shall be disposed of by one (1) of the following methods or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable:

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i. Reduction of the waste material to less than 20% VOC solvent by distillation and disposal of the still bottom waste; or

ii. Stored in closed containers for transfer to-

- A contract reclamation service; or
- A disposal facility approved by the director

K) Waste solvent shall be stored in closed containers only.

7. Training

A) Only persons who have received training on the operational and equipment requirements specified in this rule are allowed to operate the equipment.

B) The supervisor of any person who operates the equipment must have equal or better training.

C) Refresher training shall be given to all operators at least once each 12 months.

b) Record Keeping Requirement:

(1) Monthly inventory records of vapor degreaser consumption and amount purchased. These records shall include maintenance and repair logs for both the degreaser and any associated control equipment.

(2) A record of solvent metal cleaning training shall be kept for each employee who has been trained.

c) Monitoring Requirement: None

d) Reporting Requirement: None

Q) Coating Ovens -Emission Unit Specific Applications
EIQ Point Number CL-STC-01; Emission Unit Number OV-598-01
EIQ Point Number CL-STC-01; Emission Unit Number OV-598-02
EIQ Point Number CL-STC-01; Emission Unit Number OV-598-03
EIQ Point Number CL-STC-01; Emission Unit Number OV-598-04
EIQ Point Number CL-STC-01; Emission Unit Number OV-598-05
Drying Rack -Emission Unit Specific Applications
EIQ Point Number CL-STC-01; Emission Unit Number SB-598-09

1) Construction Permit Number 0396-022 Special Permit Conditions

a) Emission Limitation: The permittee may not emit more than 77.95 tons of VOC in any consecutive 12 month period from the spray booths, coating ovens, vapor degreaser, and miscellaneous equipment covered by this permit.

(a) Record Keeping Requirement: Records shall contain both monthly and 12-month cumulative totals.

(b) Monitoring Requirements: None

(c) Reporting Requirements: The permittee shall report to the APCP

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Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of the 77.95 tons emission limit demonstrated by the appropriate record keeping forms.

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STATEMENT OF BASIS

Applicable Requirements Included in the Operating Permit But Not in the Application

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

Boeing provided information concerning their applicability to regulations in some instances by means other than the application. Other methods included by email, written correspondence and hand delivered electronic documents. Some of the regulations were not enforce at the time the application was submitted but would be applicable by the time the permit was issued.

Applicable Requirements "NOT" Included in the Operating Permit

The installation is subject to the regulations listed in this section but the rules were not included in the Applicable Requirements Section of the Operating Permit for the reasons stated.

10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating* The definition of "indirect heating" as specified in 10 CSR 10-6.020, "...for the primary purposes of producing steam, hot water or hot air or other indirect heating of liquids, gases or solids where, in the course of doing so, the products of combustion do not come into direct contact with process materials...".

The installation has reported insignificant emission source(s) (space heaters) which are subject to the requirements of this rule. However, the APCP does not consider these sources to be capable of exceeding the particulate matter (PM) emission limitation. The remaining insignificant emission unit(s) are always expected to be in compliance with the PM limitation.

This rule was rescinded from the Missouri State air pollution rules on December 9, 1991, but is still included in the State Implementation Plan (SIP). This regulation regulates the emission of PM (corrected to 12% carbon dioxide) and the opacity of incinerator exhaust gases and has not been currently replaced by another Missouri Regulation. Therefore, as this regulation was rescinded from the Missouri Air Regulations and the state has no authority to enforce this regulation, this rule was not cited in the applicable requirements section of the operating permit.

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10 CSR 10-5.100, *Preventing Particulate Matter from Becoming Airborne* (Rescinded September 28, 1990)
This rule was rescinded from the Missouri State air pollution rules on September 28, 1990 but is still included in the State Implementation Plan (SIP). This regulation has been essentially replaced by Missouri Regulation 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin.* With the installation demonstrating compliance with 10 CSR 10-6.170, they will also be demonstrating compliance with this rule. Therefore, as this regulation was rescinded from the Missouri Air Regulations and the installation has demonstrated compliance with 10 CSR 10-6.170.

10 CSR 10-5.150, *Emission of Certain Sulfur Compounds Restricted* (Rescinded July 30, 1997)
This rule was rescinded from the Missouri State air pollution rules on July 30, 1997 but is still included in the State Implementation Plan (SIP). This regulation has been essentially replaced by Missouri State Regulation 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds.* With the installation demonstrating compliance with 10 CSR 10-6.260, they will also be demonstrating compliance with this rule. Therefore, as this regulation was rescinded from the Missouri Air Regulations and the installation's compliance with 10 CSR 10-6.260 was demonstrated.

10 CSR 10-5.110, *Restriction of Emission of Sulfur Dioxide for Use of Fuel* (Rescinded July 30, 1997)
This rule was rescinded from the Missouri State air pollution rules on July 30, 1997 but is still included in the State Implementation Plan (SIP). This regulation has been essentially replaced by Missouri State Regulation 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds.* With the installation demonstrating compliance with 10 CSR 10-6.260, they will also be demonstrating compliance with this rule. Therefore, as this regulation was rescinded from the Missouri Air Regulations and the installation's compliance with 10 CSR 10-6.260 was demonstrated.

Other Air Regulations Determined Not to Apply to the Operating Permit

The APCP has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

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Title IV does not apply to this installation. The permittee does not have any affected sources under Title IV of the act at this installation.

10 CSR 10-2.210, *Control of Emissions from Solvent Metal Cleaning*
This installation has a solvent metal cleaning emission source, but this regulation only applies to installations located within Clay, Jackson and Platte counties as specified by 10 CSR 10-2.210(1)(A). As the installation is located in St. Charles County, this regulation was determined not to be an applicable requirement for this installation.

10 CSR 10-5.040 The permittee has no equipment covered by this rule on its premises

10 CSR 10-5.120 The permittee does not burn residual fuel or coal at the Tract V (St. Charles) installation

10 CSR 10-5.130 The permittee does not burn residual fuel or coal at the Tract V (St. Charles) installation.

10 CSR 10-5.360, 10 CSR 5.370, 10 CSR 10-5.380, 10 CSR 5.410 and 10 CSR 10-5.440 are not applicable to this installation.

10 CSR 10-5.455 cleaning activities that are subject to the provisions of the Aerospace NESHAP are not subject to the provisions of this rule.

10 CSR 10-6.100 The permittee has not proposed any alternate emission limits for any activity in order to meet the VOC limits specified in the state rules.

40 CFR Part 60 Subpart D, D_a, D_b, D_c The boilers at this installation are (10-100 MMBTU/Hr) have not been modified, constructed or reconstructed after 10/09/89

40 CFR Part 60 Subpart E and E_a do not apply to this installation.

40 CFR Part 60 Subpart K petroleum liquid storage tanks with capacities greater than 40,000 gallons are not present in Tract V (fuel oil nos. 2 through 6 and diesel fuels nos. 2-D and 4-D are exempt from the definition of Petroleum liquid)

40 CFR Part 60 Subpart K_a Petroleum liquid storage tanks with capacities greater than 40,000 gallons are not present in Tract V. Fuel oil # 2 through 6 and Diesel fuels # 2-D and 4-D are exempt from the definition of petroleum liquid.

40 CFR Part 60 Subpart EE, Subpart V subpart H subpart I does not apply to Tract V installation.

40 CFR Part 68 The permittee has no processes in Tract V using hazardous chemicals, which exceed the thresholds defined in the "List Rules"
EIQ point number and Emission unit number CC-STC-01
EIQ point number ST-STC-01 and Emission unit number ST-598-01

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State Regulation number 10 CSR 10-5.220. The tank is a 500 gallon storage tank. The requirements are for tanks greater than 500 gallons.

Emission Point Number ST-598-21 State regulation 10-5.220 does not apply as this tank is less than 40,000 gallons and is used to store fuel oil number #2

Construction Permit Number 0396-014 stated that certain equipment be removed from service. The removal of the equipment is listed in the permit as a special condition of that permit. Because the permittee uses a new system for numbering equipment it was considered to be unnecessarily confusing and burdensome to renumber non existing equipment so it could be included into the operating permit. The equipment was removed from service, but the list of that equipment and the special condition stating its removal was not included in the operating permit. The special conditions and the equipment list follows:

The following grandfathered emissions units shall cease operation and be removed from service at the St. Charles, McDonnell Douglas Corporation by January 01, 1996: Vapor Degreaser (VD500-02, VD500-03, VD500-04 and VD500-05

The list below contains units which have been removed from service at the St. Charles, McDonnell Douglas Corporation.

Emission Units Removed from Service	Permit No:
Vapor Degreaser 500-01	1189-013
Trash Incinerator	0884-007
Hazardous Waste Incinerator	0683-002
Solvent Distillation Unit	1189-013
Grieve curing oven and wave solder station	0792-003
Two solder Pots	1292-016
Lockfoam Operation	0195-020
Circuit Board Soldering Process	0991-010
Oil Concentrator	0290-010
Spray Booth w/mek clean up	1287-004

EIQ Point Number CC-STC-01; Emission Unit Number CC-506-01,
EIQ Point Number CC-STC-01; Emission Unit Number CC-506-02,
EIQ Point Number CC-STC-01; Emission Unit Number CC-506-03,
EIQ Point Number CC-598-01; Emission Unit Number CC-598-01, these items were listed as cold cleaners in the application, but the installation updated their information during the final review process and classified them as aqueous cleaners. These cleaners are exempt from 10 CSR 10-5.300 while they are used as aqueous cleaners. (Note **Administrative Change:** Emission Unit Number CC-598-01 is not the Emission Point referred to in the

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construction permit # 0396-014 as CC-598-01. CC-598-01 and 02 as mentioned in the permit are now CC-598-02 and 03. This change was introduced by the plant as an improved logical numbering sequence for record keeping purposes.)

For the purpose of this permit the following definitions of day and shift are provided:

Day: A 24 hour period, midnight to midnight, not including weekends or official facility holidays.

Shift: A period of eight (8) to 12 hours where the same operator(s) are working and the equipment of interest is operated during the time period.

EG-500-01 and EG-500-02 were emergency generators that were removed from building 500 which was demolished. These generators were removed from the draft permit at the request of the installation.

10 CSR 10-5.060, *Refuse not to be Burned in Fuel Burning Installations (Rescinded February 11, 1979)*

This rescinded rule states "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." The emission unit(s) which burn refuse at this installation were not primarily designed for the purpose of burning fuel. Therefore, these refuse burning emission unit(s) were determined not to be subject to this regulation and the rule was not included in the applicable requirements section of the operating permit.

Other Regulatory Determinations

10 CSR 10-6.065, *Operating Permits*

On December 9, 2002, the Air Pollution Control Program (APCP) received a letter from the Environmental Protection Agency (EPA) Region VII requesting the APCP re-open the Title V (Part 70) Permits for McDonnell Douglas Corporation/Boeing St. Charles and McDonnell Douglas Corporation/Boeing St. Louis for cause. The re-opening for cause letter contained the issues the permits were being re-opened for cause and additional recommended permit revisions. The St. Charles installation contained one issue for re-opening for cause and ten additional recommended permit revisions. On December 23, 2002, the APCP sent a letter to EPA agreeing with the assessment of the operating permits as issued and proposing a schedule to re-open and revise the operating permits.

After numerous discussions between the Missouri Department of Natural

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Resources and Boeing, a resolution could not be reached on the ten additional recommended permit revisions. On June 30, 2003, it was determined, in a meeting with the Environmental Protection Agency -Region VII, Boeing, St. Louis County Department of Health and the Missouri Department of Natural Resources, only the issues addressing the permits being re-opened for cause would be addressed in the permit revision. The following is a summary of the issues contained in the letter from EPA Region VII and how the Air Pollution Control Program plans on addressing the issues in the permit renewal.

Cause for Re-Opening #1 – Emission Limitation and Reporting Provisions for Cleaning/Hand Wipe Activities (previously permit condition I)B)1., currently permit condition EU0010-001)

EPA Region VII stated that there was no provision in 40 CFR Part 63, Subpart GG authorized the permit condition I)B)1)a)(i)4. which relaxed the definition of compliance. The exact permit condition is stated below.

> "Activities not conforming to the above housekeeping measures are deemed in compliance if corrected within 24 hours, unless they are observed on three (3) successive inspections." (OP1999-052)

Any occurrence of any activity not conforming to the terms and conditions specified in the permit must be reported as an instance of non-compliance with the permit. The applicable regulation does not provide a basis for stating in the permit that a deviation must occur a specific number of times before it constitutes a violation.

The operating permit was reworded with the Housekeeping measures that are stated under §63.744(a). The condition from OP1999-052, which stated that housekeeping measures are deemed in compliance if corrected within 24 hours unless observed on three successive inspections, was not included in the revised operating permit. The regulation gives no justification for this proposed schedule for compliance determination, therefore, the compliance determination schedule, from OP1999-052, was not incorporated into the reworded operating permit.

With regards to the reporting requirements, the permittee is required to follow the reporting requirements established under §63.753(b). The permittee is also required to report to the Air Pollution Control Program Enforcement section at least semi-annually where there is a deviation of the work practice requirement (housekeeping program of EU0010-001 under the Operational Limitation section). The procedures established by the Housekeeping measures in the Operational Limitation section are

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considered to be work practice standards. Work practice standards are operating procedures that an installation must adhere but contain no specific quantifiable emission limitation. Quantifiable emission limitations would contain specific limitations for criteria pollutants that include clearly defined time constraints. For example, a quantifiable limitation would be in the terms of *lbs./hr*, *tons/month*, or *12-month rolling average*. Work practice standards are limitations that an installation must follow while operating, but do not contain a limit on the amount of emissions or contain a defined time constraint. Some example of work practice standards are *"the installation shall use closed containers", "all personnel shall be trained once per year", "the permittee shall prepare and maintain a written work practice implementation plan", and "the permittee shall place solvent clothes in closed containers"*.

40 CFR Part 63, Subpart GG established the reporting requirements for the cleaning operations under §63.753(b). Under §70.6(3)(C)(iii)(B) it is stated that Title V permits shall require the prompt reporting of all deviations. However, it also states that the permitting authority shall define prompt in relation to the degree and severity of the exceedance.

> "Prompt reporting of deviations from permit requirements, including those attributed to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. The permitting authority shall define "prompt" in relation to the degree and type of deviation likely to occur and the applicable requirements."

The APCP has routinely defined prompt reporting in each specific " *Reporting*" section for all Permit Conditions in Title V permits. For units that contain quantifiable emission limitations, the APCP has determined that the installation must report all exceedance within ten days of the installation's knowledge of the exceedance. It is crucial for the installation to report the deviation to the APCP Enforcement section so that the APCP can ensure public health is not endangered and that corrective action is being taken. The APCP has determined that while work practice standards are important to be reported, the impact of an exceedance for these specific housekeeping measures is not as severe as a deviation from a quantifiable emission limitation since extreme amounts of excess emissions of pollutants are not introduced to the atmosphere. Deviations from the specific work practice standards in EU0010-001 are basically operating protocols that are not maintained but do not result in detrimental emissions. Since the results of a digression from this specific work practice standard (EU0010-001) is of a

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lesser degree than exceedances from quantifiable emissions, the APCP has determined that it would be justifiable for the installation to be allowed to report any departure from the standard at least semi-annually. The installation is required to report all deviations in the semi-annual monitoring report and the annual compliance certification.

The additional recommended permit revisions #2-11 will be addressed upon operating permit renewal.

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

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

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

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

a)

Mr. Bharat Mathur, Bureau Chief
Illinois Environmental Protection Agency
Division of Air Pollution Control
P.O. Box 19276
Springfield, IL 62794-9276

RE: Affected States Review – Notification of Proposed Final Part 70 Operating Permit

Dear Mr. Mathur:

In accordance with Missouri State Rule 10 CSR 10-6.065(6)(F)1. and the Clean Air Act this letter is to notify you of public notice of the preliminary draft and request for comments for:

McDonnell Douglas Corporation a wholly-owned
subsidiary of the Boeing Company
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Public notice was published in the St. Louis Post Dispatch, St. Louis, MO, on December 20, 1998.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing by 4:30 p.m. on January 19, 1999 to my attention at Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Should you require further information or documentation on this matter, please contact the Operating Permits Unit at (573) 751-4817. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Randy E. Raymond
Permits Section Chief

RDR:thb

McDonnell Douglas Corporation a wholly-owned
subsidiary of the Boeing Company
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Re: Draft Title V Operating Permit – Permit No.: **Error! Reference source not found.**

Dear Mr. Pierce:

The Air Pollution Control Program (APCP) has completed the preliminary review of your Title V permit application. A public notice was placed in the St. Louis Post Dispatch, St. Louis, MO, on December 20, 1998. The conditions and monitoring requirements of the draft permit are open for comment by the public and yourself until January 19, 1999. Standard permit wording (i.e. Applicable Regulations) is not open for comment, since these provisions are required by law and regulation.

The APCP will accept comments regarding the conditions and monitoring regulations that are postmarked on or before the closing date. Please address comments or recommendations for changes to my attention at:

Operating Permits Unit
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65101

A copy of this draft has also been sent to the U.S. EPA's Region VII office in Kansas City for their review. The Region VII office is afforded, by law, oversight authority on any Title V permit which Missouri (or any of the other states in the region) may propose to issue. A public hearing may be held if sufficient interest is expressed by the public.

Should you have any questions, or wish clarification on any items in this draft permit, please feel free to contact me at (573) 751-4817. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Timothy Paul Hines
Environmental Engineer

TH/bw

Enclosures
c: PATs File –183-0010-020