



Basic Operating Permit Notification Application Instructions for Form 780-1872

Air Pollution Control Program

7/2008

Missouri's Operating Permits Program includes provisions for *Basic State Operating Permits*. These are sources that are not classified as "Major Sources." This rule can be found at Missouri Code of State Regulations, or CSR, Title 10 Division 10 Chapter 6 Rule 065, Operating Permits.

Sources that are required to obtain an operating permit under 10 CSR 10-6.065 must complete the accompanying notification forms. All applicants must:

- Submit duplicate copies of the notification.
- Submit \$100 application fee for all submittals, except administrative amendments.
- Based on information formed after reasonable inquiry, provide statements and information that are true, accurate and complete.
- Provide original signatures, no copies, of the responsible official.

Installations required to obtain a *Basic State Operating Permit* must file an initial permit notification within 30 days after commencement of operations. *Basic State Operating Permits* are valid for five years from the date of receipt or acceptance, whichever is later, of the notification. Permittees must file a permit renewal notification at least six months prior to the expiration date of an existing operating permit.

Permittees must file operating permit amendments promptly any time incorrect, incomplete, false, or misleading information is discovered in an operating permit notification. Typically, permittees will file amendments or modifications when emissions units covered by the operating permit are modified, or become subject to new regulations that require compliance before the permit expires.

A copy of Missouri Code of State Regulations Title 10 Division 10 rules may be obtained by contacting the Secretary of State's Office at 573-751-4936. A copy is also available at www.sos.mo.gov/adrules/csr/current/10csr/10csr.asp#10-10.

Applicants must mail their completed notification package to one of the agencies listed below, depending on whose jurisdiction the installation is in. For additional assistance or further questions, contact the appropriate authority:

Missouri Department of Natural Resources
Air Pollution Control Program
Operating Permit Unit
P.O. Box 176
Jefferson City, MO 65102-0176
573-751-4817
Fax: 573-751-2706
www.dnr.mo.gov/env/apcp/index.html

Missouri Department of Natural Resources
Air Pollution Control Program
Air Pollution Assistance Office
P.O. Box 176
Jefferson City, MO 65102-0176
800-361-4827
www.dnr.mo.gov/env/apcp/smbus.htm#assistance

City of St. Louis:

Division of Air Pollution Control
1415 North 13th St., St. Louis, MO 63106
314-613-7300
Fax: 314-613-7275
stlouis.missouri.org/citygov/airpollution/

City of Springfield:

Air Pollution Control Authority
227 East Chestnut Expressway, Springfield, MO 65802
417-864-1000
Fax: 417-864-1499
www.springfieldmo.gov/health/airQuality.html

St. Louis County:

St. Louis County - Health
Air Pollution Control Program
111 South Meramec Ave., Clayton, MO 63105
314-615-8924
Fax: 314-615-8951
www.stlouisco.com/doh/environ/airpollut.html

Kansas City:

Air Quality Program
2400 Troost Ave., Kansas City, MO 64108
816-513-6314
Fax: 816-513-6290
www.kcmo.org/health.nsf/web/airqual?OpenDocument

Section A - General Notification Information

Section A-1: General Installation Information

Box 1 - Installation Name: Enter the official company name and plant designation for the installation submitting this Basic Operating Permit Notification. This name will usually be the one registered with the Missouri Department of Revenue. This official installation name must be entered on every form submitted.

Box 2 – County Name: Enter the name of the county within which the majority of the facility resides. This will be the same county used when reporting the Air Pollution Control Program’s Emission Inventory Questionnaire, or EIQ.

Box 3 – Plant ID: If you have not been assigned a facility identification number by the Missouri Air Pollution Control Program or your local agency, then simply leave this box blank. The Federal Information Processing Standards county code number (minus the “29” that is the Missouri state code) in combination with the Plant ID, provides the 7-digit identification number for the installation in State/Federal databases. This will be the same code used when reporting the Air Pollution Control Program’s Emission Inventory Questionnaire. You may enter either the Plant ID (which is the last 4-digits of the Air Program facility ID), or the full 7-digit facility ID.

Date Stamp: Please leave blank.

Box 4 – Installation Telephone Number: Enter the installation telephone number with area code for general installation information.

Box 5 - Installation Fax Number: Enter the telephone number with the area code on which the installation receives facsimiles.

Box 6, 7 and 8 – Installation Mailing Address, City and ZIP: Enter the mailing address, city and ZIP at which the installation receives mail. This may be left blank if it is the same as the physical street address.

Box 9, 10 and 11 – Installation Street Address, City and ZIP: Enter the street address, city and ZIP for the installation. The street address is the physical location of the installation. The one at which emergency services would use to respond.

Box 12 – Missouri Senatorial District Number: Enter the Missouri Senatorial District Number for the installation. This information is available from the following Web site: www.senate.mo.gov/lookup/leg_lookup.aspx. If the Internet is not available, contact your county clerk or call the Air Pollution Assistance Office.

Box 13 – Installation Contact Person: Enter the name of the individual that Air Pollution Control Program permitting staff should contact with questions. This person should be familiar with the operations of the installation represented in this notification.

Box 14 – Missouri Representative District Number: Enter the Missouri Representative District Number for the installation. This information is available from the following Web site: www.senate.mo.gov/lookup/leg_lookup.aspx. If the Internet is not available, contact your county clerk or call the Air Pollution Assistance Office.

Box 15 – Installation Contact Telephone Number: Enter the telephone number with area code, of the installation contact person (listed in Box 13).

Box 16 – Installation Contact E-mail Address: Enter the e-mail address for the installation contact person (listed in Box 13).

Box 17 – Parent Company Name: Enter the parent company name (Headquarters/Corporate/Parent Company) for the installation, if there is one. This information is used for installations that have different installation names or addresses on check information to assist in applying the submitted payment to the proper installation and for those installations that prefer environmental information to be sent to the parent company personnel. Please note: A copy of the notification stamped “Received” must be kept at the installation even if the contact is at the Headquarters/Corporate/Parent Company location.

Box 18, 19, 20 and 21 – Parent Company Address, City, State, ZIP: Enter the parent company mailing address and ZIP.

Box 22 – Parent Company Contact Person: If the applicant would prefer that the parent company contact be called about environmental issues, then enter the parent company contact information.

Box 23 – Parent Company Contact Telephone Number: If the applicant has entered a parent company contact, enter its telephone number with area code.

Box 24 – Parent Company Contact E-mail Address: If the applicant has entered a parent company contact, enter its e-mail address.

Section A-2: Type of Basic Operating Permit Notification

Box 25 – Check only one notification type.

- **Initial:** If the installation does not have an operating permit, this is an initial application.
- **Renewal:** If the installation has a Basic Operating Permit and the company desires to renew it, file a renewal notification at least six months prior to the expiration date. Include the current operating permit or project number in the “Installation Description”, Box 26. or use Section C: Comment Forms. Notifications for permit renewals follow the same procedural requirements that apply to initial permit issuance.
- **Modification:** If at any time after an operating permit notification has been submitted or accepted by the permitting authority, the permittee shall submit a modification notification to correct any false, misleading, incorrect or incomplete information. Also, if an operating permit notification fails to include or inadequately implements any applicable requirement, including any new requirement published after the permitting authority’s acceptance of the operating permit notification, the permittee shall submit a modification notification to supplement the current information.
- **Administrative Amendment:** A permittee may submit an administrative amendment for any of the following:
 - To change the name, address or phone number of any person identified in the permit, or provide a similar minor wording change at the installation.
 - To change the ownership or operational control of an installation where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee is submitted to the permitting authority.

Section A-3: Installation Description

Box 26: Enter a brief description of the products and processes at the installation, or any other information indicated to be entered here.

Box 27: Answer the question by checking the appropriate box. If the answer is “No”, submit an EIQ for the previous calendar year with this notification.

Section A-4: Compliance Status

Box 28: Will your installation be in compliance with all applicable requirements at the time of notification submittal and continue to comply with these requirements for the duration of the notification?

If the installation is in compliance with all applicable requirements and plans to continue to be in compliance with all applicable requirements during the Basic Operating permit term when the notification is submitted, check “Yes”. Otherwise, the applicant should check “No”.

Box 29: Will your installation be in compliance with all applicable requirements published prior to this notification containing a compliance deadline within the terms of this notification?

If the installation expects to be in compliance with all applicable requirements published prior to the notification on or before the compliance deadline specified by the applicable requirements during the term of the permit, check “Yes.” Otherwise, the applicant should check “No”.

A common example of an applicable requirement published and scheduled to take effect sometime during the permit term would be a Maximum Achievable Control Technology standard.

Section A-5: Compliance Plan

If the applicant marks “No” in either Box 28 or Box 29, you must submit a compliance plan on Section C: Comment Form that:

- Specifies which applicable requirements the installation is not expected to be in compliance with.
- Details the steps the applicant will take that will lead to compliance.
- The projected dates the applicant expects to be in compliance.

If the installation is required to submit a compliance plan, enter the applicable requirement, the compliance plan and the expected date of compliance for the installation. The plan should specify what requirement(s) the installation expects not to comply with and explain how compliance with the requirement(s) will be achieved. The plan should include a schedule of remedial measures and an enforceable sequence of actions, with milestones, leading to compliance.

Section A-6. Certification of Compliance with All Applicable Requirements and the Applicants Certification Statement.

The responsible official of the installation must sign the compliance certification. The permit notification must include a description of monitoring, record-keeping, reporting and test methods required to demonstrate compliance. The responsible company official is required to certify to the truth, accuracy and completeness of the notification.

If the responsible official is unable to certify that an emission unit is in compliance with an applicable requirement, a compliance plan must be submitted according to the guidelines specified in Section A-5.

Knowingly falsifying any certification is a felony under the Clean Air Act; therefore, the responsible official must take care in preparing the certification and have confidence in the accuracy and completeness of the certification.

The applicant’s certification statement must be signed by the installation’s Responsible Official. A responsible official is:

1. The president, secretary, treasurer or vice-president of a corporation in charge of a principal business function, or any other person who performs similar policy and decision-making functions for the corporation or a duly authorized representative of this person if the representative is responsible for the overall operation of one or more manufacturing, production or operating facilities applying for or subject to a permit and either:
 - The facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars).
 - The delegation of authority to their representative is approved in advance by the permitting authority.
2. A general partner in a partnership or the proprietor in a sole proprietorship.
3. A published principal executive officer or a ranking elected official in a municipality, state, federal, or other public agency. For the purpose of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the operations of a principal geographic unit of the agency.
4. The designated representative of an affected source insofar as actions, standards, requirements or prohibitions under Title IV of the Clean Air Act or the regulations published under the Act are concerned or the designated representative for any purposes under Part 70.

Notifications without a signed certification will be returned as incomplete. Signing this document has serious legal implications – both civil and criminal. Before signing, the installation’s responsible official should be confident that the materials submitted are substantially correct and that the installation is in compliance with all applicable requirements, or on a compliance plan, included in the notification.

Box 30 – Signature of responsible official of installation: Enter the signature of the installation’s representative that satisfies the definition of responsible official, who has read and understands the certification statement contained in Section A-6.

Box 31 – Date: Enter the date of the responsible official’s signature.

Box 32 – Type or print name of responsible official: Enter the name of the installation’s representative that satisfies the definition of responsible official, who signed the notification in Box 30.

Box 33 – Title of Responsible Official: Enter the title of the installation’s representative that satisfies the definition of responsible official, who signed the notification in Box 30.

Section B - Applicable Requirements

This form is required to contain each applicable requirement that applies to the installation. Under the Missouri Operating Permit Program, the applicant is required to identify in the permit notification all the applicable requirements (federal, state or local) associated with the installation. The applicant shall use this form to identify all applicable requirements (both the legal authority for the requirement and a summary of the standard), which emission units, or the installation as a whole, are subject to the standards, and the methods the applicant will use to demonstrate compliance with the standard or emission limitation. The basis for the compliance method may come from the applicable requirement or from a methodology known to be sufficient to demonstrate compliance with the standard.

The methodologies to demonstrate compliance include all testing, monitoring, record-keeping and reporting requirements as well as any additional methods established by applicable-requirements or special permit conditions to which the emission unit(s) is subject. If an applicable requirement does not specify exactly what must be done to show compliance, the installation may propose practices that are appropriate to the emission unit(s).

The applicant should consult the appropriate sections in the Code of Federal Regulations, Code of State Regulations or the local agency codes or ordinances for the full text of the applicable requirements.

The following Web sites contain the full text of the respective applicable requirements:

Missouri: www.sos.mo.gov/adrules/csr/current/10csr/10csr.asp#10-10

City of Springfield: www.municode.com/resources/gateway.asp?pid=11598&sid=25

Kansas City Chapter 8 Air Quality:
www.municode.com/resources/gateway.asp?sid=25&pid=10156

City of St. Louis: www.slpl.lib.mo.us/cco/ords/data/ord5645.htm

St. Louis County: www.municode.com/resources/gateway.asp?pid=11512&sid=25

Federal – Missouri Implementation Plan:
www.epa.gov/region7/programs/artd/air/rules/missouri/toc.htm

Federal – 40 CFR Part 59 - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products:

www.tceq.state.tx.us/permitting/air/rules/federal/59/59hmpg.html

Federal – 40 CFR Part 60 - Standard of Performance for New Stationary Sources

www.tceq.state.tx.us/permitting/air/rules/federal/60/60hmpg.html

Federal – 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants

www.tceq.state.tx.us/permitting/air/rules/federal/61/61hmpg.html

Federal – 40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (a.k.a. Maximum Achievable Control Technology)

www.tceq.state.tx.us/permitting/air/rules/federal/63/63hmpg.html

Federal – 40 CFR Part 82 - Protection of Stratospheric Ozone

www.tceq.state.tx.us/permitting/air/rules/federal/82/82hmpg.html

The first step in identifying the applicable requirements is to identify the regulations applicable to the geographic location of the installation. Once the applicant has identified the appropriate geographic location, they should examine the potential requirements and identify the applicable regulations on this form. For example, sources in the City of St. Louis will be subject to federal regulations, Missouri Chapters 5 and 6 rules, and perhaps City ordinances. Applicants must read through these requirements to verify the applicability of each regulation as well as to determine the compliance status with each requirement.

When the applicant has identified the regulations and requirements that are applicable to the installation, they should summarize those requirements in Section B. The applicant must identify how they will demonstrate compliance with the applicable requirements. If more space is needed, the applicant may copy the continued Section B page as often as needed, or use Section C: Comment Form. Sample sheets may be attached to the application which will demonstrate the proposed record-keeping and reporting methods.

The applicant needs to complete the following information contained on the form for each applicable requirement and construction permit special conditions:

- **Column 1 - Regulation or Construction Permit Reference:** Enter all the applicable requirements that apply to the installation. If the installation has multiple compliance options for a specific requirement, the installation can either include the requirement multiple times in the table or use additional Section C: Comment Forms to provide the compliance options.
- **Column 2 - Applicable Emission Unit (as listed in EIQ):** Enter the emission point identification number and the EIQ year being referenced. This number should correspond to the EIQ emission point for the specific pieces of equipment subject to the applicable requirement and compliance demonstration provisions. This should be consistent with the latest EIQ submitted. If the applicant believes the entire installation is subject to the requirement, the installation can insert “PW” for Plant-Wide.
- **Column 3 - Applicable Emission Limit or Standard:** Enter the emission limitation, operational limitation, work practice standard or operational standard from the applicable requirement as it applies to the specific emission unit (emission point reference) and compliance demonstration provisions. If the applicable requirement is a construction permit condition, the applicant must reference the construction permit. If the applicable requirement contains only one emission limit or standard, the applicant may reference the applicable requirement. However, if the applicable requirement contains multiple emission limitations or standards, the applicant needs to identify the specific requirement applicable to the emission unit at the installation.

- **Column 4 - Method of Compliance Determination:**

Enter the current methodology used to ensure compliance with the Applicable Emission Limit or Standard. These methodologies include all testing, monitoring, record-keeping and reporting requirements as well as any additional methods established by applicable requirements or special permit conditions to which the emission unit(s) is subject. If an applicable requirement does not specify exactly what must be done to show compliance, the applicant may propose practices that are appropriate to the Emission Unit(s). If the applicable requirement is a construction permit, the applicant may reference the construction permit. If the applicable requirement contains one compliance demonstration methodology, the applicant may reference the applicable requirement. However, if the applicable requirement contains multiple compliance options, the applicant must identify the specific option(s) chosen by the installation to demonstrate compliance with the applicable requirement.

Example: The following are some examples for completing the table:

Column 1	Column 2	Column 3	Column 4
Regulation or Emission Point Permit Reference	Applicable Limit or Standard (as listed in EIQ)	Applicable Emission Compliance	Method of Construction
10 CSR 10-3.060, Max Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating	EP 8,9 (2002)	< 0.60 lbs PM/MMBTU	The equipment shall be limited to burning natural gas and #2 fuel oil and maintain fuel receipts and Potential Emission Calculations.
10 CSR 10-6.060, Construction Permits CP #1098-003	EP 5-7 (2002)	As listed in CP.	As listed in CP.
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	EP 8,9 (2002)	20% (except for six minute period in 60 minutes of 40%)	The installation shall observe the stacks and notify the department if excess emissions are detected or corrective action taken.
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	EP 8, 9 (2002)	< 2000 PPMV sulfur dioxide; < 70 mg/m ³ sulfuric acid or sulfur trioxide or combination on consecutive 3 hr avg; and Ambient Air Quality Standards of 10 CSR 10-6.010	The equipment shall be limited to burning natural gas and #2 fuel oil and maintain fuel receipts and Potential Emission Calculations.

The table already contains some requirements, which are commonly identified as “core permit requirements” applicable to all installations. These requirements also offer examples of how to summarize the applicable standards. Each applicant needs to consult the appropriate sections in the Code of Federal Regulations, or CFR, and Code of State Regulations, or CSR, for the full text of the applicable requirements to understand the regulations. The installation needs to read the requirements and identify the applicable emission point (as listed in the EIQ) for each core permit requirement.

Section C - General Comments

Additional information that may further clarify an aspect of the installation’s operating permit notification that has not been addressed on another form can be included on this page.

For any comment made, please be sure to include: the installation’s name, 7-digit identification number. If the details about specific equipment or emission units are made, then provide Emission Unit/Point numbers (consistent with EIQ) and reference the form or section to which the information pertains.

For More Information

Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
573-751-4817
Fax: 573-751-2706
www.dnr.mo.gov/env/apcp/index.html