

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

OCT - 2 2006

Mr. Greg Simpson, Plant Manager
Nordyne, Inc.
1747 Cravens Road
Poplar Bluff, MO 63901

Re: Nordyne, Inc., 023-0062
Permit Number: **OP2006-072**

Dear Mr. Simpson:

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS: csk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
Southeast Regional Office
PAMS File: 2005-07-068



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2006-072
Expiration Date: OCT - 1 2011
Installation ID: 023-0062
Project Number: 2005-07-068

Installation Name and Address

Nordyne, Inc.
1747 Cravens Road
Poplar Bluff, MO 63901
Butler County

Parent Company's Name and Address

Nortek Holdings, Inc.
50 Kennedy Plaza
Providence, RI 02903-2360

Installation Description:

Nordyne Inc. manufactures heating, ventilation and air conditioning (HVAC) equipment. Sources of air pollutants include: hydraulic and mechanical presses, lubrication systems, hand-held and automatic brazers, touch-up painting stations, solvent wipe cleaning stations, adhesive application stations, and combustion testing stations.

OCT - 2 2006

Effective Date

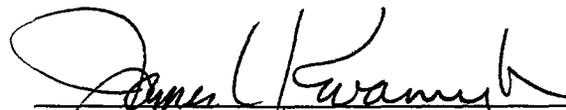

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Nordyne Inc. manufactures heating, ventilation and air conditioning (HVAC) equipment. Nordyne has other installations similar to this one in Poplar Bluff.

Aluminum sheet stock is delivered to the plant in large rolls. High-speed presses cut and press the aluminum to fin specifications. During this process, the aluminum is lightly lubricated with evaporative lubricating oil with a 90% volatile organic compound (VOC) content (EP-01). Prefabricated copper tubing is threaded through fins. Curved copper tube return bends are brazed to the tubes (EP-02). Components are assembled to make finished HVAC equipment. Components come pre-painted, but some touch-up painting is done using paint with 50% VOC content (EP-03). A citrus mold cleaner is used as a final wipe solvent (EP-04). After furnaces are assembled, their fuel combustion is tested (EP-05).

Sources of air pollutants include: hydraulic and mechanical presses, lubrication systems, hand-held and automatic brazers, touch-up painting stations, solvent wipe cleaning stations, adhesive application stations, and combustion testing stations.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2004	-	-	-	54.00	-	-	-
2003	-	-	-	39.84	-	-	-
2002	-	-	-	36.16	-	-	-
2001	0.01	-	0.32	19.90	0.16	-	-
2000	-	-	-	-	-	-	-

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	EP #
EU0010	Hydraulic Press No. 1	EP-01
EU0020	Hydraulic Press No. 2	EP-01
EU0030	Hydraulic Press No. 3	EP-01
EU0040	Hydraulic Press Seyi (P17)	EP-01
EU0050	Hydraulic Press Seyi (P23)	EP-01
EU0060	Mechanical Power Press	EP-01
EU0070	Hairpin Machine No. 2	EP-01
EU0080	Fin Press Stock Lubricator No. 2	EP-01
EU0090	Mechanical Press Brake (B2)	EP-01
EU0100	Hydraulic Press Brake (B10)	EP-01
EU0110	Fin Press No. 1 Plus Lubricating Bath (FP01)	EP-01

EU0120	Fin Press No. 2 Plus Lubricating Bath (FP02)	EP-01
EU0130	Fin Press No. 5 Plus Lubricating Bath (FP05)	EP-01
EU0140	Hair Pin Press No. 2 (HP02 Bender)	EP-01
EU0150	Hair Pin No. 4 (HP04 Bender)	EP-01
EU0160	Blower Wrapper Machine (BW01)	EP-01
EU0170	Return Bend Machine (MRB)	EP-01
EU0180	176 Ton Sutherland Punch Press (P6)	EP-01
EU0190	440 Ton Press (HP14)	EP-01
EU0200	Twenty Existing Hand-held Brazing Stations	EP-02
EU0210	Existing Autobrazer #48011	EP-02A
EU0220	Twenty-five New Hand-held Brazing Stations	EP-02
EU0230	Fourteen Adhesive Application Stations	None

EMISSION UNITS WITHOUT LIMITATIONS

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

<u>Description of Emission Source</u>	<u>EP #</u>
Five touch up paint stations, fugitive	EP-03
Five solvent wipe stations, fugitive	EP-04
Three fuel combustion test stations, natural gas, 0.085 MMBtu/hr each	EP-05
Nine heaters, natural gas, 2.219 MMBtu/hr each	EP-06
Tumbler-type parts washer using non-VOC containing detergent	EP-07
Cybertech autobrazer	EP-08
Coil leak test using helium gas	None
Foam packaging machine, fugitive	None
Thirty-three hydraulic presses using no evaporative oil	None
Resistance spot welder, fugitive	None
Two 175 TIG seam welders, fugitive	None
Tube lubrication system using non-VOC containing oil, fugitive	None

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 122000-004 issued November 21, 2000; amended April 7, 2004
- 2) Construction Permit 042004-001 issued February 12, 2004

II. Plant Wide Emission Limitations

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

None.

III. Emission Unit Specific Emission Limitations

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

EU0010 THROUGH EU0190 – EVAPORATIVE LUBRICATING OIL USE			
Emission Unit	Description	Manufacturer/ Model #/Serial #	EIO #
EU0010	Hydraulic Press No. 1: MHDR 0.256 gal/hr; fugitive; installed 2001	JOSE ITURROSPE/ PMM-400-72/48-21/ 1367	EP-01
EU0020	Hydraulic Press No. 2: MHDR 0.256 gal/hr; fugitive; installed 2001	"/1368	EP-01
EU0030	Hydraulic Press No. 3: MHDR 0.256 gal/hr; fugitive; installed 2001	"/1369	EP-01
EU0040	Hydraulic Press Seyi (P17): MHDR 0.256 gal/hr; fugitive; installed 1996	SEY 1 /HSD-220-H/ P-17, #2270	EP-01
EU0050	Hydraulic Press Seyi (P23): MHDR 0.256 gal/hr; fugitive; installed 1996	SEY 1/HSD-275/ P-23, #2265	EP-01
EU0060	Mechanical Power Press: 330 ton; MHDR 0.256 gal/hr; fugitive; installed 1980	Sutherland/FDP-300/ P-43,#10052	EP-01
EU0070	Hairpin Machine No. 2: hairpin press; MHDR 0.15 gal/hr; fugitive; installed 2001	Burr Oak Tool/ VBHB-M7-10-18LH 080700	EP-01
EU0080	Fin Press Stock Lubricator No. 2: fin press stock lubricator using evaporative lubricating oil; MHDR 1.2 gal/hr; fugitive; installed 1992	Burr Oak Tool/ 1299-1	EP-01
EU0090	Mechanical Press Brake (B2): MHDR 0.256 gal/hr; fugitive; installed 02/01/2005	Unknown	EP-01
EU0100	Hydraulic Press Brake (B10): MHDR 0.256 gal/hr; fugitive; installed 02/01/2005	Chicago Dreis & Krump/Unknown	EP-01
EU0110	Fin Press No. 1 Plus Lubricating Bath (FP01): 24 row mechanical power press and lubricator; MHDR 0.6 gal/hr; fugitive; installed 02/01/2005	Fin Press - Burr Oak/ 34 x 34 Lubricating Bath - Kargard Industries/B8593	EP-01
EU0120	Fin Press No. 2 Plus Lubricating Bath (FP02): 24 row mechanical power press and lubricator; MHDR 0.6 gal/hr; fugitive; installed 02/01/2005	Fin Press - Burr Oak/ Unknown Lubricating Bath - Unknown	EP-01
EU0130	Fin Press No. 5 Plus Lubricating Bath (FP05): 48 row mechanical power press and lubricator to fin press No. 5; MHDR 1.2 gal/hr; fugitive; installed 02/01/2005	Fin Press - Burr Oak/ 51 x 48 Lubricating Bath - Lubriqip/Trabon Modu- Flow Pump	EP-01
EU0140	Hair Pin Press No. 2 (HP02 Bender): hair pin press, bender unit, 12 row; MHDR 0.2 gal/hr; fugitive; installed 02/01/2005	Burr Oak/ DVBHB-M144-1118078	EP-01

EU0150	Hair Pin No. 4 (HP04 Bender): hair pin press, bender unit, 16 row; MHDR 0.3 gal/hr; fugitive; installed 02/01/2005	Burr Oak/ Unknown	EP-01
EU0160	Blower Wrapper Machine (BW01): MHDR 0.256 gal/hr; fugitive; installed 02/01/2005	Unknown	EP-01
EU0170	Return Bend Machine (MRB): MHDR 0.2 gal/hr; fugitive; installed 02/01/2005	Burr Oak/ MRB-M3-140-RB	EP-01
EU0180	176 Ton Sutherland Punch Press (P6): punch press with 24 inch servofeed; MHDR 0.256 gal/hr; fugitive; installed 02/01/2005	Sutherland/ Unknown	EP-01
EU0190	440 Ton Press (HP14): 440 ton press with servo feed; MHDR 0.256 gal/hr; fugitive; installed 02/01/2005	Seyi/13900	EP-01

PERMIT CONDITION (EU0010 THROUGH EU0190)-001

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

Emission Limitation:

The permittee shall emit less than 94 tons of volatile organic compounds (VOC) in any consecutive 12 month period from emission units EU0010 through EU0190 (Emission Point EP-01, Evaporative Lubricating Oil Use).

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of VOC emitted into the atmosphere from these units.
- 2) Attachment A contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 3) These records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.
- 4) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon their verbal request and presentation of identification.
- 5) Attachment B demonstrates that, as long as this permit condition is met, the installation will emit less than 100 tons VOC per year, which will keep it below the Part 70 threshold. This attachment is part of this permit, and the permittee shall keep it with the rest of this permit.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P. O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records indicate the source exceeds the emission limitation.

PERMIT CONDITION (EU0010 THROUGH EU0190)-002

10 CSR 10-6.060 Construction Permits Required

Construction Permit 122000-004 Issued November 21, 2000, Amended April 7, 2004

Operational Limitation:

Evaporating Lubricating Oil (Emission Point, EP01) shall not contain any hazardous air pollutants (HAPs).

Monitoring/Recordkeeping/Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after determining that any unit EU0010 through EU0190 used evaporating lubricating oil containing hazardous air pollutants (HAP).

EU0200 AND EU0210 – EXISTING BRAZING STATIONS			
Emission Unit	Description	Manufacturer/Model #	EIQ Reference #
EU0200	Twenty Existing Hand-held Brazing Stations; includes split line 2 hand brazing stations (10 station and 2 repair) and coil fabrication hand brazing operations (7 stations and 1 repair); total MHDR 32 lbs brazing rods/hr and 81,500 Btu/hr; natural gas; fugitive	Various	EP-02
EU0210	Existing Autobrazer #48011; MHDR 16 lb brazing rings/hr and 1.8 MMBtu/hr natural gas; stack 2; installed 1992	Lusas-Milhaupt/40426	EP-02

PERMIT CONDITION (EU0200 AND EU0210)-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 122000-004 Issued November 21, 2000, Amended April 7, 2004

Emission Limitation:

Nordyne, Inc. shall emit less than 15 tons of particulate mater less than ten (10) microns in diameter (PM₁₀) in any consecutive 12-month period from the existing 20 hand brazing units (EP02) and Auto Brazer #48011 (EP02A).

Monitoring/Recordkeeping/Reporting:

Attachment C demonstrates that the installation is in compliance with this emission limitation. This attachment is part of this permit, and the permittee shall keep it with the rest of this permit. No additional monitoring, recordkeeping or reporting is required for this permit condition.

EU0220 – NEW BRAZING STATIONS			
Emission Unit	Description	Manufacturer/Model #	EIQ Reference #
EU0220	Twenty-five New Hand-held Brazing Stations; MHDR 32 lb brazing rods/hr, 81,600 Btu/hr natural gas, fugitive; installed 2005	Various	EP-02

PERMIT CONDITION EU0220-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 042004-001 Issued February 12, 2004

Emission Limitation:

Nordyne, Inc. shall emit less than 15 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12-month period from the new 25 hand held brazing station (EP02).

Monitoring/Recordkeeping/Reporting:

Attachment D demonstrates that the installation is in compliance with this emission limitation. The permittee shall keep this attachment with the rest of this permit. No additional monitoring, recordkeeping or reporting is required for this permit condition

EU0230 – ADHESIVE APPLICATION STATIONS		
Emission Unit	Description	2004 EIQ Reference #
EU0230	Fourteen Adhesive Application stations, installed 2001	None

PERMIT CONDITION EU0230-001
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitations:

- 1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from the Fourteen Adhesive Application Stations (EU0230) any visible emissions with an opacity greater than 20%.
- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on all stack(s) from which emissions from these stations vent to the atmosphere, using the procedures contained in Test Method 22 in Appendix A of 40 CFR Part 60. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when one or more stations are operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. When visible emissions are perceived or believed to exceed the applicable opacity standard, the source representative would then conduct an observation using the procedures contained in Test Method 9 in Appendix A of 40 CFR Part 60.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then –
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then –
 - c) Observations must be made semi-annually. If a violation is noted, monitoring reverts to weekly. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency. If the source has already performed the weekly and biweekly monitoring and is doing monitoring in compliance with a previous permit, the weekly and biweekly monitoring do not need to be repeated.

Recordkeeping:

- 1) The permittee shall maintain records of all Method 22 observation results (See Attachment E1 or E2.), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions that result in visible emissions. (See Attachment F.)

- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment G.)
- 4) Attachments E1, E2, F, and G are forms satisfying these recordkeeping requirements. These forms or equivalents created by the permittee must be used to certify compliance with this requirement.
- 5) The permittee shall maintain these records for the most recent five years. They must be maintained on-site for two years. They may be kept in either written or electronic form.
- 6) The permittee shall immediately make these records available for inspection to any Department of Natural Resources or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

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

10 CSR 10-6.150 Circumvention

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

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

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) 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.
- 3) 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; The type of business or activity involved; 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;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit 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 Nordyne, Inc. from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

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

V. General Permit Requirements

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

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

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

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

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

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

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

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

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

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

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

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

None

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

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

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

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

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

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

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

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

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

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

ATTACHMENT B

Demonstration That Installation Is Under Part 70 Volatile Organic Compound Limit (100 tons/yr)

Company Name: Nordyne Inc.
Installation Location: 1747 Cravens Rd., Poplar Bluff, MO 63901 Butler County Installation ID: 023-0062

The table below demonstrates that as long as the installation is in compliance with Permit Condition (EU0010 THROUGH EU00190)-001, its potential to emit Volatile Organic Compounds (VOC) is 96.56 tons/yr. This is below the Part 70 threshold of 100 tons/yr.

ID #	Description	Maximum Hourly Design Rate (MHDR)	VOC Emission Factor (EF)	VOC Emissions (tons/yr)
EU0010 - EU0190	Evaporative Lubricating Oil Use	Voluntary limitation		94.00
EU0200	20 Existing Hand Held Brazers (0.0816 MMBtu each)	0.0016 X 10 ⁶ scf/hr	5.5 X lb/10 ⁶ scf ¹	0.04 ⁷
EU0210	Existing Autobrazer #48011 (1.8 MMBtu)	0.0018 X 10 ⁶ scf/hr	5.5 X lb/10 ⁶ scf ¹	0.04 ⁷
EU0220	25 New Hand Held Brazers (0.0816 MMBtu each)	0.0020 X 10 ⁶ scf/hr	5.5 X lb/10 ⁶ scf ¹	0.05 ⁷
EU0230	14 adhesive application stations	8.96 gal/hr ³	0.005 lb/gal ²	0.20 ⁷
None	Cybertech autobrazer (1.2 MMBtu)	0.0012 X 10 ⁶ scf/hr	5.5 X lb/10 ⁶ scf ¹	0.03 ⁷
None	9 heaters (2.219 MMBtu each)	0.019 X 10 ⁶ scf/hr ⁴	5.5 X lb/10 ⁶ scf ¹	0.10 ⁷
None	5 touch up paint stations	0.0195 gal/hr ⁵	3.22 lb/gal ²	0.28 ⁷
None	5 solvent wipe stations	0.0625 gal/hr ⁶	7.0056 lb/gal ²	1.92 ⁷
Total				96.66

Notes:

- Emission factor for brazers and heaters (natural gas combustion) is from Table 1.4-2 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- Emission factors for adhesive application, touch up paint and solvent wipe stations are from permit application.
- MHDR = 0.64 gal/hr per adhesive application station X 14 stations = 8.96 gal/hr
- $$MHDR = (9) \left(\frac{2.219 MMBtu}{hr} \right) \left(\frac{10^6 Btu}{MMBtu} \right) \left(\frac{scf Natural Gas}{1050 Btu} \right) = 0.019 X 10^6 scf Natural Gas / hr$$
- MHDR = 0.0039 gal/hr per touch-up paint station X 5 stations = 0.0195 gal/hr
- MHDR = 0.0125 gal/hr per solvent wipe station X 5 stations = 0.0625 gal/hr
- VOC Emissions = MHDR X EF X (0.0005ton/lb) X (8760 hr/yr)

ATTACHMENT C

Demonstration of Compliance With Permit Condition (EU0200 AND EU0210)-001 Page 1 of 2

Company Name: Nordyne Inc.
Installation Location: 1747 Cravens Rd., Poplar Bluff, MO 63901 Butler County Installation ID: 023-0062

Potential to Emit (PTE) Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) from EU0200

The Twenty Existing Hand-held Brazing Stations (EU0200) can emit PM₁₀ from both natural gas consumption (combustion emissions) and from brazing rod consumption (process emissions)

Combustion Emission Factor for natural gas = 7.6 lb PM₁₀ / 10⁶ scf natural gas [From Table 1.4-2 in U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition]

Maximum Hourly Design Rate (MHDR) of EU0200 = 81,500 Btu/hr

Heating Value of natural gas = 1050 Btu/scf.

Combustion PM₁₀ PTE for EU0200 =

$$\left(\frac{81,500 \text{ Btu}}{\text{hr}} \right) \left(\frac{\text{scf Natural Gas}}{1050 \text{ Btu}} \right) \left(\frac{7.6 \text{ lb PM}_{10}}{10^6 \text{ scf Natural Gas}} \right) \left(\frac{8760 \text{ hrs}}{\text{yr}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 0.0026 \text{ tons / yr}$$

Process Emission Factor for brazing rods = 0.028 lb PM₁₀ / lb brazing rods [This assumes that 2.8% of brazing rod mass turns to fumes, and is based on American Welding Society Document "Guide for Estimating Welding Emission for EPA and Ventilation Permit Reporting".]

Maximum Hourly Design Rate (MHDR) of EU0200 = 32 lb brazing rods/hr

Process PM₁₀ PTE for EU0200 =

$$\left(\frac{32 \text{ lb Brazing Rods}}{\text{hr}} \right) \left(\frac{0.028 \text{ lb PM}_{10}}{\text{lb Brazing Rod}} \right) \left(\frac{8760 \text{ hrs}}{\text{yr}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 3.9 \text{ tons / yr}$$

$$\text{PM}_{10} \text{ PTE for EU0200} = 0.0026 \text{ tons/yr} + 3.9 \text{ tons/yr} = 3.9 \text{ tons/yr}$$

PTE PM₁₀ for EU0210

The Existing Autobrazer #48011 (EU0210) can emit PM₁₀ from both natural gas consumption (combustion emissions) and from brazing ring consumption (process emissions). Emissions from brazing flux are insignificant because so little of it is used.

Combustion Emission Factor for natural gas = 7.6 lb PM₁₀ / 10⁶ scf natural gas [Same source as for EU0200 above]

Maximum Hourly Design Rate (MHDR) of EU0210 = 1.8 MMBtu/hr

Heating Value of natural gas = 1050 Btu/scf.

Combustion PM₁₀ PTE for EU0210 =

$$\left(\frac{1.8 \text{ MMBtu}}{\text{hr}} \right) \left(\frac{10^6 \text{ Btu}}{\text{MMBtu}} \right) \left(\frac{\text{scf Natural Gas}}{1050 \text{ Btu}} \right) \left(\frac{7.6 \text{ lb PM}_{10}}{10^6 \text{ scf Natural Gas}} \right) \left(\frac{8760 \text{ hrs}}{\text{yr}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 0.057 \text{ tons / yr}$$

ATTACHMENT C

Demonstration of Compliance With Permit Condition (EU0200 AND EU0210)-001 Page 2 of 2

Company Name: Nordyne Inc.

Installation Location: 1747 Cravens Rd., Poplar Bluff, MO 63901

Butler County

Installation ID: 023-0062

Process Emission Factor for brazing rings = 0.028 lb PM₁₀ / lb brazing rings [Same source as for EU0200 above]

Maximum Hourly Design Rate (MHDR) of EU0210 = 16 lb brazing rings/hr

Process PM₁₀ PTE for EU0210 =

$$\left(\frac{16 \text{ lb Brazing Rings}}{\text{hr}} \right) \left(\frac{0.028 \text{ lb PM}_{10}}{\text{lb Brazing Ring}} \right) \left(\frac{8760 \text{ hrs}}{\text{yr}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 2.0 \text{ tons / yr}$$

$$\text{PM}_{10} \text{ PTE for EU0200} = 0.057 \text{ tons/yr} + 2.0 \text{ tons/yr} = 2.1 \text{ tons/yr}$$

Total PTE PM₁₀ for EU0200 and EU0210

$$\text{Total PM}_{10} \text{ PTE for EU0200 and EU0210} = 3.9 \text{ tons/yr} + 2.1 \text{ tons/yr} = 6.0 \text{ tons/yr}$$

Since the total potential to emit PM10 from EU0200 and EU0210 is 6.0 tons/yr, and this is less than 15 tons/yr, these units are always in compliance with Permit Condition (EU0200 AND EU0210)-001.

ATTACHMENT D
Demonstration of Compliance With Permit Condition EU0220-001

Company Name: Nordyne Inc.
Installation Location: 1747 Cravens Rd., Poplar Bluff, MO 63901 Butler County Installation ID: 023-0062

Potential to Emit (PTE) Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) for EU0220

The Twenty-five New Hand-held Brazing Stations (EU0220) can emit PM₁₀ from both natural gas consumption (combustion emissions) and from brazing rod consumption (process emissions). Emissions from brazing flux are insignificant because so little of it is used.

Combustion Emission Factor for natural gas = 7.6 lb PM₁₀ / 10⁶ scf natural gas [From Table 1.4-2 in U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition]

Maximum Hourly Design Rate (MHDR) of EU0220 = 81,600 Btu/hr

Heating Value of natural gas = 1050 Btu/scf.

Combustion PM₁₀ PTE for EU0220 =

$$\left(\frac{81,600 \text{ Btu}}{\text{hr}} \right) \left(\frac{\text{scf Natural Gas}}{1050 \text{ Btu}} \right) \left(\frac{7.6 \text{ lb PM}_{10}}{10^6 \text{ scf Natural Gas}} \right) \left(\frac{8760 \text{ hrs}}{\text{yr}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 0.0026 \text{ tons / yr}$$

Process Emission Factor for brazing rods = 0.028 lb PM₁₀ / lb brazing rods [This assumes that 2.8% of brazing rod mass turns to fumes, and is based on American Welding Society Document "Guide for Estimating Welding Emission for EPA and Ventilation Permit Reporting".]

Maximum Hourly Design Rate (MHDR) of EU0220 = 32 lb brazing rods/hr

Process PM₁₀ PTE for EU0220 =

$$\left(\frac{32 \text{ lb Brazing Rods}}{\text{hr}} \right) \left(\frac{0.028 \text{ lb PM}_{10}}{\text{lb Brazing Rod}} \right) \left(\frac{8760 \text{ hrs}}{\text{yr}} \right) \left(\frac{\text{ton}}{2000 \text{ lb}} \right) = 3.9 \text{ tons / yr}$$

PM₁₀ PTE for EU0220 = 0.0026 tons/yr + 3.9 tons/yr = 3.9 tons/yr

Since the total potential to emit PM10 from EU0220 is 3.9 tons/yr, and this is less than 15 tons/yr, this unit is always in compliance with Permit Condition EU0220-001.

ATTACHMENT G

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min.	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.
 Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer _____

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received July 14, 2005
- 2) 2004 Emissions Inventory Questionnaire, received March 14, 2005
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition

Historical Notes on Emission Units and Voluntary Emission Limitation

The following historical notes explain the differences between the emission units and limitations in this operating permit, the previous operating permit and the EIQ's on file for this installation.

- 1) Construction Permit 042004-001 specified that the permittee discontinue operation of all equipment listed below. Therefore, this equipment is no longer included in the operating permit.

EIQ EP #	Equipment Description
EP-01	Hydraulic Press, Komatsu #Obs-200-2
	Hydraulic Press, Lien Chien #LDP-500
	Hydraulic Press, Superior #2354
	Hydraulic Press, Beckwood (P34)
	Mechanical Power Press, Detroit #2466
	Mechanical Power Press Toggle Unit #2474
	Mechanical Power Press, Niagara, #BP2-250-48-36
	Hairpin Machine No. 1, Burr Oak Tool, Model #VBH B-M8-35-RH
	Fin Press Stock Lubricator Bath No. 1, Oak Tool
	Fin Press Stock Lubricator Bath No. 2, Oak Tool
	Hairpin Machine Oak Tool #VB1TB-M10-16-RH-101587
EP-02	Split Line 1 Hand Brazing Operations (10 stations and 2 repair stations)
	P3B Hand Brazing Operations (9 stations)
	Seam Welder, Standard, #2459, Model # CS2-12-150
	Seam Roller #2457, Taylor-Winfield #2769
	Seam Roller #2459, Standard #2769
	Spot Welder, Taylor-Winfield #WB 2420
Vertical Spot Welder Lora Machinery	
EP-03	Touch Up Paint - Split Line 1, Line 4 & Line 5
EP-04	Final Cleaning Solvent Wipe Split Line 1, Line 4, & Line 5

- 2) With the exception of the last three items, the following equipment was added to the facility since the issuance of the previous operating permit. This equipment is included in this permit.

EU ID #	Equipment Description
EU0090	Mechanical Press Brake (B2)
EU0100	Hydraulic Press Brake (B10)
EU0110	Fin Press No. 1 Plus Lubricating Bath (FP01)
EU0120	Fin Press No. 2 Plus Lubricating Bath (FP02)
EU0130	Fin Press No. 5 Plus Lubricating Bath (FP05)
EU0140	Hair Pin Press No. 2 (HP02 Bender)
EU0150	Hair Pin No. 4 (HP04 Bender)
EU0160	Blower Wrapper Machine (BW01)
EU0170	Return Bend Machine (MRB)
EU0180	176 Ton Sutherland Punch Press (P6)
EU0190	440 Ton Press (HP14)
EU0220	25 New Hand Held Brazing Units
EU0230	Thirteen adhesive application stations ¹ (AD01-AD13)
Emission Units Without Limitations	Hydraulic presses using no evaporative oil
	Four touch up paint stations ² (EP-03)
	Four solvent wipe stations ³ (EP-04)
	Cybertech autobrazer (EP-08)
	Foam packaging machine
	Tube lubrication system
	Tumbler-type part washer
	Resistance spot welder (RW01)
	Two 175 TIG (TW01 - TW02)
	Coil leak test using helium gas
Three fuel combustion test stations ⁴	
Activities Not Required to Be Listed	Floor cleaning activities (maintenance) ⁴
	Maintenance (non-production related) welding ⁴

Notes:

- Thirteen adhesive application stations were added, making the total number of adhesive application stations fourteen.
- Three of four existing touch up paint stations (Split Line 1, Line 4 & Line 5) were removed and four new stations were added, making the total number of touch-up paint stations five.
- Three of four existing solvent wipe stations (Split Line 1, Line 4, & Line 5) were removed and four new stations were added, making the total number of solvent wipe stations five.
- These units/activities existed at the time of the previous permit, but were not mentioned because they are exempt.

- 3) The following sources were modified since the issuance of the previous operating permit.

EU ID #	Equipment Description	Modification
EU0070	Hairpin Machine No. 2	Evaporative oil use MHDR changed from 0.256 gal/hr to 0.15 gal/hr
EU0080	Fin Press Stock Lubricator No. 2	Evaporative oil use MHDR changed from 0.256 gal/hr to 1.2 gal/hr

- 4) In the previous operating permit, the permittee accepted a voluntary, federally enforceable limit of 97 tons of volatile organic compound (VOC) emissions annually (equivalent to not more than 33,000 gallons of evaporative lubricating oil) from the entire installation. In this renewal operating permit, the permittee accepted a limit of 94 tons VOC in any consecutive 12-month period on emission units EU0010 through EU0190 (Evaporative Lubricating Oil Use) only. Attachment B demonstrates that this limitation will still guarantee that the installation does not exceed the part 70 threshold of 100 ton/yr VOC.

Reasons for Listing Emission Units as Without Limitations

The following are in the list of "Emission Units Without Limitations" for the following reasons. Also, the installation has "activities not required to be listed", including floor cleaning activities and maintenance (non-production) welding.

- 1) Five touch up paint stations, fugitive (EP-03)

The total Maximum Hourly Design Rate for all of these stations taken together is 0.01953 gal/hr. Assume a 50% transfer efficiency rate. The paint used is "Custom Aerosol Packaging's Touch-Up Spray Paint 8983020 Textured Sterling Gray". It has a density of 6.59 lb/gal, and volatile organic compounds constitute 3.22 lb/gal of this, so worst-case (no water) solids content is 6.59 lb/gal - 3.22 lb/gal = 3.37 lb/gal. Calculate worst-case emissions as follows.

$$E = \left(\frac{0.0195 \text{ gal}}{\text{hr}} \right) \left(\frac{3.37 \text{ lbPM}_{10}}{\text{gal}} \right) (100\% - 50\%) = 0.03 \text{ lbPM}_{10} / \text{hr}$$

This is much less than 0.5 lb/hr, so the stations are exempt from 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, per §(1)(B)11 of that regulation. With particulate emissions this low, it is reasonable to assume that they will never exceed the minimum 20% opacity limit in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, so that regulation relevant either. The VOC emissions from this emission unit are included in Attachment B calculations of total VOC emissions for the installation.

- 2) Five solvent wipe stations, fugitive (EP-04)

These solvent wipe stations emit volatile organic compounds, but no particulate matter. Their worst-case (Citrus Mold Cleaner instead of Ken Pride P201LF) VOC emissions are included in Attachment B calculations of total VOC emissions for the installation.

- 3) Three fuel combustion test stations, natural gas, 0.085 MMBtu/hr each (EP-05). Since they burn natural gas exclusively, they are exempt from 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*, per §(1)(A)2 of that regulation. The PM emission factor for natural gas combustion given in Table 1.4-2 of the U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, is 7.6 lb PM/10⁶ scf natural gas. The heating value of natural gas is 1050 Btu/scf. Calculate the PM emissions for each station as follows.

$$E = (3) \left(\frac{0.085 \text{ MMBtu}}{\text{hr}} \right) \left(\frac{10^6 \text{ Btu}}{\text{MMBtu}} \right) \left(\frac{\text{scf Natural Gas}}{1050 \text{ Btu}} \right) \left(\frac{7.6 \text{ lbPM}}{10^6 \text{ scf Natural Gas}} \right) = 0.0018 \text{ lbPM} / \text{hr}$$

This is much less than 0.5 lb/hr, so the stations are exempt from 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, per §(1)(B)11 of that regulation. With

particulate emissions this low, it is reasonable to assume that they will never exceed the minimum 20% opacity limit in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, so that regulation is not relevant either. The VOC emissions from this emission unit are not included in Attachment B calculations of total VOC emissions for the installation, because they are too small to affect the total.

- 4) Nine heaters, natural gas, 2.219 MMBtu/hr each (EP-06). Since they burn natural gas exclusively, they are exempt from 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*, per §(1)(A)2 of that regulation. The PM emission factor for natural gas combustion given in Table 1.4-2 of the U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, is 7.6 lb PM/10⁶ scf natural gas. The heating value of natural gas is 1050 Btu/scf. Calculate the PM emissions for each station as follows.

$$E = (9) \left(\frac{2.219 \text{ MMBtu}}{\text{hr}} \right) \left(\frac{10^6 \text{ Btu}}{\text{MMBtu}} \right) \left(\frac{\text{scf Natural Gas}}{1050 \text{ Btu}} \right) \left(\frac{7.6 \text{ lb PM}}{10^6 \text{ scf Natural Gas}} \right) = 0.14 \text{ lb PM / hr}$$

This is much less than 0.5 lb/hr, so the stations are exempt from 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, per §(1)(B)11 of that regulation. With particulate emissions this low, it is reasonable to assume that they will never exceed the minimum 20% opacity limit in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, so that regulation is not relevant either. The VOC emissions from this emission unit are included in Attachment B calculations of total VOC emissions for the installation.

- 5) Tumbler-type parts washer using non-VOC containing detergent (EP-07)
This unit has no known air emissions.

- 6) Cybertech autobrazer (EP-08)

The total Maximum Hourly Design Rate for this unit is 15 lb brazing rings/hr and 1.2 MMBtu/hr. Calculations similar to those in Attachment C for the other autobrazer show that this unit will emit 0.43 lb PM/hr (0.009 lb/hr from combustion and 0.42 lb/hr from process). This is less than 0.5 lb/hr, so it is exempt from 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, per §(1)(B)11 of that regulation. The flow rate through the stack for this unit is 3500 ft³/min, so the emission can also be calculated as

$$E = \left(\frac{0.43 \text{ lb PM}}{\text{hr}} \right) \left(\frac{7000 \text{ grains}}{\text{lb}} \right) \left(\frac{\text{hr}}{60 \text{ min}} \right) \left(\frac{\text{min}}{3500 \text{ ft}^3} \right) = 0.014 \text{ grain PM / ft}^3$$

With particulate emissions this low, it is reasonable to assume that they will never exceed the minimum 20% opacity limit in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, so that regulation is not relevant either. The VOC emissions from this emission unit are included in Attachment B calculations of total VOC emissions for the installation.

- 7) Coil leak test using helium gas

The only air emission from this is helium, which is not regulated.

- 8) Foam packaging machine, fugitive

This unit is completely sealed during use. The machine uses Instapak Components "A" and "B". Component "A" is 100% polymeric methylene diphenylene diisocyanate (polymeric MDI), which is a HAP, and is non-volatile. Component "B" is 2.5% by weight amine catalyst and is non-volatile.

Calculations using the method in *MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry*, developed by the Alliance for the Polyurethane Industry (API) in 2002, show that the amount of MDI (4.15×10^{-6} lb/yr actual in this case) escaping such a unit is insignificant.

- 9) Thirty-three hydraulic presses using no evaporative oil
These units have no known air emissions.

- 10) Resistance spot welder, fugitive

There are no known emissions factors for resistance welding. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition, confirms this, as does the EPA's Factor Information Retrieval (FIRE) Data System. The American Welding Society's Fact Sheet No. 21 on Resistance Spot Welding states that "unlike many other welding or cutting processes", resistance welding produces "little fumes" The TWI World Center for Materials joining Technology states in their document on resistance spot welding that "little fume is produced but may need attention when welding coated steels or when oils or organic materials are present". This resistance spot welder is used on uncoated aluminum.

- 11) Two 175 TIG seam welders, fugitive

The total Maximum Hourly Design Rate for both these two identical welders is 4.38 lb alloy/hr, so MHDR for each one is 2.19 lb alloy/hr. The emission factor for cored wire, non-gas shielded welding, taken from American Welding Society document on welding, is 3.50% of consumables. Calculate worst-case emissions for each station as follows.

$$E = \left(\frac{2.19 \text{ lb Alloy}}{\text{hr}} \right) \left(\frac{3.5 \text{ lb PM}}{100 \text{ lb Alloy}} \right) = 0.08 \text{ lb PM}_{10} / \text{hr}$$

This is much less than 0.5 lb/hr, so the stations are exempt from 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, per §(1)(B)11 of that regulation. With particulate emissions this low, it is reasonable to assume that they will never exceed the minimum 20% opacity limit in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, so that regulation is not relevant either.

- 12) Tube lubrication system using non-VOC containing oil, fugitive

This system sprays oil on the inside of 3/8-inch diameter stainless steel tubing. The best guess at application rate is 0.5 gal/hr, so double this to get worst-case. The spraying operation is completely sealed and contained inside of each piece of tubing, so it is reasonable to assume a 99% transfer efficiency rate. The oil used contains no volatile organic compounds and has a density of 7.59 lb/gal. For worst-case, assume it is 100% solids by weight. Calculate worst-case emissions as follows.

$$E = \left(2 \times \frac{0.5 \text{ gal}}{\text{hr}} \right) \left(\frac{7.59 \text{ lb PM}_{10}}{\text{gal}} \right) (100\%) (100\% - 99\%) = 0.08 \text{ lb PM}_{10} / \text{hr}$$

This is much less than 0.5 lb/hr, so the emission unit is exempt from 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, per §(1)(B)11 of that regulation. With particulate emissions this low, it is reasonable to assume that it will never exceed the minimum 20% opacity limit in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, so that regulation is not relevant either.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 10 CSR 10-6.100, *Alternate Emission Limits*, does not apply to this installation because it is in an ozone attainment area.
- 2) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating* was marked as applicable in the renewal permit application. However, this regulation does not apply to the brazing units, which are similar to welding units and are not indirect heating sources. It does not apply to the three natural gas fuel combustion testing stations either, because these use natural gas for the purpose of testing completed furnaces, not for the purpose of heating.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

- 1) Construction Permit 122000-004, issued November 21, 2000 and amended April 7, 2004, required recordkeeping to demonstrate compliance with its emission limitation on PM₁₀. The emission limitation is included in this permit in Permit Condition (EU0200 AND EU0210)-001. However, compliance is now demonstrated with calculations, in Attachment C, which show that these units always in compliance. The recordkeeping is no longer necessary.
- 2) Construction Permit 042004-001, issued February 12, 2004, required recordkeeping to demonstrate compliance with its emission limitation on PM₁₀. The emission limitation is included in this permit in Permit Condition EU0220-001. However, compliance is now demonstrated with calculations, in Attachment D, which show that these units always in compliance. The recordkeeping is no longer necessary.

New Source Performance Standards Applicability

None of the NSPS standards apply to this facility.

Maximum Available Control Technology Applicability

The facility does not emit any single hazardous air pollutant (HAP) in an amount greater than 10 tons per year nor does the facility emit any combination of HAP in an amount greater than 25 tons per year. Therefore, MACT regulations are not applicable to this facility.

National Emission Standards for Hazardous Air Pollutants Applicability

In the permit application and according to ACP records, there was no indication that any Missouri Air Conservation Law, *Asbestos Abatement*, 643.225 through 643.250; 10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*; Subpart M, *National Standards for Asbestos*; and 10 CSR 10-6.250, *Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption* apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

None of the other NESHAP standards apply to this installation.

Other Regulatory Determinations

- 1) 10 CSR 10-6.220, *Restriction of Emission of Visible Contaminants*, applies to the Fourteen Adhesive Application Stations (EU0230). The Maximum Hourly Design Rate for each of these units is 0.64 gal/hr, so their total MHDR is 8.96 gal/hr. The adhesive used is "Kingo Duct Liner Adhesive 10-595. It has a density of 8.71 lb/gal and is 40.65% volatiles by weight, so its solids content = $(100\% - 40.65\%) \times (8.71 \text{ lb/gal}) = 5.71 \text{ lb/gal}$. Even if transfer efficiency were 90%, the stations' potential to emit particulate matter is $\left(\frac{8.96 \text{ gal Adhesive}}{\text{hr}}\right) \left(\frac{5.71 \text{ lb PM}}{\text{gal}}\right) (100\% - 90\%) = 5.12 \text{ lb PM / hr}$. With such a large PTE, it is possible that these stations could exceed the minimum opacity limit of 20%. This regulation, unlike 10 CSR 10-6.400 does not contain an exemption for fugitive sources. Therefore it is included in this permit.
- 2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, does not apply to the following sources in this operating permit for the reasons given:
 - a) Emissions from Evaporative Lubricating Oil Use (EU0010 through EU0190) do not contain particulate matter.
 - b) Per §(1)(B)11 of the regulation, the Existing Autobraser #48011 (EU0200) is exempt because its potential to emit particulate matter is less than 0.5 lb/hr. As shown in Attachment C, the PM₁₀ PTE for this unit is 2.1 tons/yr. This is 0.48 lb/hr.
 - c) Per §(1)(B)7 of the regulation, the Fourteen Adhesive Application Stations (EU0230) are exempt because they are fugitive sources.

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

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

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.

- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

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

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