



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **01 2008 - 010** Project Number: 2007-08-073

Parent Company: True Manufacturing Company, Inc.

Parent Company Address: P.O. Box 970, O'Fallon, MO 63366

Installation Name: True Manufacturing Company – Pacific

Installation Address: 900 Integram Drive, Pacific, MO 63069

Location Information: Franklin County, S10, T43N, R2E

Application for Authority to Construct was made for:
An increased use of touch up spray paint operations, cleaning and wipe-down with solvent and welding & brazing operations and addition of new natural gas space heaters units due to an increase in production. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
 - Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JAN 25 2008

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

Page No.	3
Permit No.	
Project No.	2007-08-073

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

True Manufacturing Company - Pacific
Franklin County, S10, T43N, R2E

1. Emission Limitation
 - (A). True Manufacturing Company – Pacific shall emit less than ten (10) tons of Toluene from the entire installation in any consecutive 12-month period.
 - (B). Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A). True Manufacturing Company – Pacific shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
 - (C). True Manufacturing Company – Pacific shall report to the Air Pollution Control Program's 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 from Special Condition Number 1(B) indicate that the source exceeds the limitation of Special Conditions Number 1(A).
2. Operational Requirements

True Manufacturing Company – Pacific shall keep all paints solvents and cleaning solutions in sealed containers whenever the materials are not in use. True Manufacturing Company – Pacific shall provide and maintain suitable, easily read, permanent markings on all paints, solvents, and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2007-08-073
Installation ID Number: 071-0205
Permit Number:

True Manufacturing Company - Pacific
900 Integram Drive
Pacific, MO 63069

Complete: November 28, 2007

Parent Company:
True Manufacturing Company, Inc.
P.O. Box 970
O'Fallon, MO 63366

Franklin County, S10, T43N, R2E

REVIEW SUMMARY

- True Manufacturing Company – Pacific has applied for authority to construct based on an increased use of touch up spray paint and wipe – down with solvents and the use of natural gas space heaters. An increase in production is due to an increased use of touch up spray paint operations, cleaning and wipe-down with solvent and welding & brazing operations and addition of new natural gas space heaters units.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are Xylene (CAS # 1330-20-7), Ethyl Benzene (CAS # 100-41-4), Toluene (CAS # 108-88-3), Tetrachloroethylene (CAS # 127-18-4), Methyl Isobutyl Ketone (MIBK) (CAS # 108-10-1) and Glycol Ethers (CAS # 20-10-0).
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential of VOC is above de minimis level but below major level.
- This installation is located in Franklin County, a nonattainment area for ozone (O₃) and an attainment area for all other criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential HAP emissions of the application are conditioned to below de minimis levels. Since potential VOC emissions are below major source levels no ambient air quality modeling is required. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

True Manufacturing Company manufactures commercial refrigeration equipment, including display cases, food preparation tables, and restaurant refrigerators. Cooler components made at the O'Fallon facility are shipped to Pacific facility for cooler assembly. Products are wiped clean using different chemicals and touch up of scratches from assembly by using non-refillable aerosol paint spray cans and other enamel touchup paint on the cooler assembly lines. A Basic operating permit is required for this installation, since VOC potential emission is less than major source level and above the de minimis source level. This permit was reviewed in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Existing equipment was previously under de minimis levels, therefore no permits have been issued to True Manufacturing Company – Pacific from the Air Pollution Control Program.

PROJECT DESCRIPTION

This permit incorporates all of the emission equipment now at True Manufacturing Pacific. Due to an increase in production of cooler components at the O'Fallon facility, there will be increased use of touch up paint, welding and cleaning at the Pacific site. The operation consists of touch up spray paint, wipe-down cleaning, and eight (8) natural gas space heaters rated at maximum hourly design rate at 22.4 MMBtu/hr total. No emission control devices have been used to control emissions from spray paint, wipe cleaning, welding, space heaters. Toluene is the only HAP with potential emissions greater than 10.0 tons per year. Thus, the company voluntarily requested a 10.0 ton per year limit for toluene. As such, the combined HAP potential emissions are less than 25.0 tons per year. The touch-up paint is based on maximum historical averages at a rate of 0.795 gal/hr for spray-paint and 0.005 gal/hr for spray-solvent paint. The wipe cleaning is also based on maximum historical averages. Welding MHDR is .003 (1000 lb/hr).

EMISSIONS/CONTROLS EVALUATION

The emissions of concern from this project are VOCs and HAPs. Potential HAPs of concern includes xylene, ethyl benzene, toluene, Tetrachloroethylene, Methyl Isobutyl Ketone (MIBK), and glycol ethers. The emission factors used in the VOCs and HAPs emissions analysis were developed from the MSDS submitted with the permit application and through the use of mass balanced around the process.

The emission factors and control efficiencies used in the combustion equipment analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4, *Natural Gas Combustion* (3/98).

The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	*Existing Actual Emissions (EIQ 2006)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	0.04	0.75	N/A
Sox	40.0	N/A	N/A	0.06	N/A
NOx	40.0	N/A	0.49	9.81	N/A
VOC	40.0	N/A	14.48	80.24	N/A
CO	100.0	N/A	0.1	8.24	N/A
Combined HAPs	25.0	N/A	0.17	24.25	N/A
Xylene	10.0	N/A	N/A	2.28	N/A
Ethyl Benzene	10.0	N/A	N/A	0.36	N/A
Toluene	10.0	N/A	N/A	19.76	<10
Tetrachloroethylene (Perchloroethylene)	10.0	N/A	N/A	0.86	N/A
Methyl Isobutyl Ketone (MIBK)	10.0	N/A	N/A	0.92	N/A
Glycol Ethers	10.0	N/A	N/A	0.06	N/A

N/A = Not Applicable

*Existing emissions are not presented. The potential emissions of this application reflect the potential emissions of the entire installation.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential VOC is above de minimis level but below major level. Potential emissions of HAPs are conditioned to below major levels to avoid Section (9) review.

APPLICABLE REQUIREMENTS

True Manufacturing Company – Pacific shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. Based on the 2006 EIQ that was submitted by True Manufacturing Company - Pacific, the actual VOC reported was 14.48 tons per year [(13.04 tons VOC from EP-01 (Cleaning/Wipedown), 1.41 tons from EP-02 (Touchup/Repair Paint, Non-Refillable Aerosol Cans), and 0.03 tons VOC from EP-05 (Space Heaters)]. 10 CSR 10-5.330, **Control of Emission From Industrial Surface Coating Operations, 10 CSR 10-5.330**, is not applicable since emissions are only 1.41 tons for touchup/repair which is less than the 2.5 ton qualifier.

Since emissions are only 1.41 tons for touchup/repair which is less than the 2.5 ton qualifier, then is not applicable and does not apply to the company.

Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-5.030 is applicable to the company since total heat input for installation is 22.4 BTUs per hour which is > 10 million BTUs per hour and less than or equal to one thousand (1000) million BTUs per hour.

Maximum allowable particulate ER for new sources in an installation of indirect heating sources with a heat input rate equal to or greater than ten (10) million BTUs per hour and less than or equal to one thousand (1000) million BTUs per hour shall be determined by the following equation:

$$E = 0.80(Q)^{-.301}$$

Since the installation $Q = 22.4$ BTUs per hour therefore the $E = 0.31$ lb/MMBTU/hr which is less than the emission limitations of 0.40 pounds per million BTUs of heat input for an installation of indirect heating sources with a heat input rate of less than ten (10) million BTUs per hour, which means that the company will be in compliance with the rule at all time.

Control of Emissions From Solvent Metal Cleaning, 10 CSR 10-5.300 is not applicable and does not apply to the company because it is exempted under this rule per **10 CSR 10-5.300(1)(D)E**.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Control of Odors in the Ambient Air, 10 CSR 10-5.160*

SPECIFIC REQUIREMENTS

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

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Samer Al-Shoukhi
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 30, 2007, received August 14, 2007, designating True Manufacturing Company, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Material Safety Data Sheets (MSDS) was submitted with the permit application
- Saint Louis Regional Office Site Survey, dated September 17, 2007.

Mr. Charles Hon
Engineer
True Manufacturing Company - Pacific
900 Integram Drive
Pacific, MO 63069

RE: New Source Review Permit - Project Number: 2007-08-073

Dear Mr. Hon:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Samer Al-Shoukhi at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:sal

Enclosures

c: Saint Louis Regional Office
PAMS File 2007-08-073

Permit Number: