



## 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: 052009-008 Project Number: 2007-08-111

Parent Company: Camcorp Inc.

Parent Company Address: 8224 Nieman Rd., Lenexa, KS 66214

Installation Name: Camcorp Manufacturing

Installation Address: 3 Coastal Dr., Willow Springs, MO 65793

Location Information: Howell County, S33, T27N, R9W

Application for Authority to Construct was made for:  
Initial construction permit for paint booths in an air pollution control equipment manufacturing plant. This review was conducted in accordance with Section (5), 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.

MAY 11 2009

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.	2007-08-111

## 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."*

Camcorp Manufacturing  
Howell County, S33, T27N, R9W

1. Emission Limitation
  - A. Camcorp Manufacturing shall emit less than 40.0 tons of Volatile Organic Compounds (VOCs) from this installation in any consecutive 12-month period.
  - B. Camcorp Manufacturing shall emit less than ten (10.0) tons individually or twenty-five (25.0) tons combined of Hazardous Air Pollutants (HAPs) from this installation in any consecutive 12-month period.
  - C. Attachment A, Attachment B and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A) and 1(B). Camcorp Manufacturing shall maintain all records required by this permit for not less than five (5) years and shall make them available to any Missouri Department of Natural Resources personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in this equipment.
  - D. Camcorp Manufacturing 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(C) indicate that the source exceeds the limitation of Special Conditions Number 1(A) and 1(B).
2. Control Device – Fiberglass Filter  
Fiberglass filters must be in use at all times when paint booths (EP01 and EP02) are in operation. The filters shall be operated and maintained in accordance with the manufacturer's specifications.
3. Operational Requirements  
Camcorp Manufacturing shall keep the paint solvents and cleaning solutions in sealed containers whenever the materials are not in use. Camcorp Manufacturing shall provide and maintain suitable easily read permanent markings on all paint solvent and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2007-08-111  
Installation ID Number: 091-0081  
Permit Number:

Camcorp Manufacturing  
3 Coastal Dr.  
Willow Springs, MO 65793

Complete: August 22, 2007

Parent Company:  
Camcorp Inc.  
8224 Nieman Rd.  
Lenexa, KS 66214

Howell County, S33, T27N, R9W

REVIEW SUMMARY

- Camcorp Manufacturing has applied for authority to construct a paint booth operation at a facility that manufacturers air pollution control equipment.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are ethylbenzene, xylene, toluene, methanol, hexane, and cobalt compounds.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants or currently promulgated Maximum Achievable Control Technology regulations apply to the proposed equipment. Subpart M, *National Emissions Standards for Hazardous Air pollutants for Surface Coating of Miscellaneous Metal Parts and Products* does not apply as the installation is not a major source for HAPs.
- Fiberglass filters are being used to control the PM<sub>10</sub> emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of HAPs and VOCs are conditioned to de minimis levels.
- This installation is located in Howell County, an attainment area for all 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 emissions of the application are conditioned to de minimis levels.
- Emissions testing is not required for the source.
- An Operating Permit is not required for this installation.
- Approval of this permit is recommended with special conditions.

### INSTALLATION/PROJECT DESCRIPTION

This facility fabricates air pollution control equipment. The installation consists of two paint booth operations (EP01 and EP02). Camcorp Manufacturing previously installed and operated these paint booth operations without applying for a construction permit even though the (controlled) potential emissions are above the de minimis levels. No enforcement action was taken, however, because the inspector is waiting for the completion of this project to see if the potential emissions are above the de minimis levels.

### EMISSIONS/CONTROLS EVALUATION

The emission factors were obtained from mass balances. The document "Sources and Control of Volatile Organic Air Pollutants" was used to obtain a transfer efficiency of 10% for airless spray painting of non-flat surfaces. A control efficiency of 99.0% was used from the manufacturer's testing reports. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation during the time that the paint booth is available for operation. Since the paint booths must be used for a two-hour prep time and two-hour finishing time (for drying, curing, etc. as applicable) for every painting session, which last a maximum of four hours, there will be a maximum of four hours of non-painting activities in the paint booths for every four hours of painting. This amounts to a maximum total of 4,380 hours of painting per year.

After the potential emissions of each paint type were calculated, the maximum potential emission of each pollutant was taken by selecting the paint type that yielded the maximum potential emission for each pollutant. For example, the paint type with the highest percent solids was assumed to be used year-round to determine the potential emission of PM<sub>10</sub>, the paint type with the highest percent xylene was used for the xylene potential emission, the paint type with the highest percent VOCs was used for the VOC emission, etc.

The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2006 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	N/A	N/A	2.63	N/A
SO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A
NO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	12.98	292.06	<40.0
CO	100.0	N/A	N/A	N/A	N/A
HAPs	25.0	N/A	N/A	292.06	<25.0
Ethylbenzene	10.0	N/A	N/A	43.81	<10.0
Xylene	10.0	N/A	N/A	248.25	<10.0
Toluene	10.0	N/A	N/A	142.57	<10.0
Methanol	10.0	N/A	N/A	28.51	<10.0
Hexane	10.	N/A	N/A	202.98	<10.0
Cobalt compounds	10.0	N/A	N/A	0.32	<10.0

N/A = Not Applicable

#### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs and HAPs are conditioned to below de minimis levels.

#### APPLICABLE REQUIREMENTS

Camcorp Manufacturing 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.

#### 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 April 1 for the previous year's emissions.
- *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

- *Restriction of Emission of Odors*, 10 CSR 10-3.090

#### 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 (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Jeannie Kozak  
Environmental Engineer

\_\_\_\_\_  
Date

#### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 15, 2007, received August 22, 2007, designating Camcorp Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey, dated September 12, 2007.
- Material Safety Data Sheets.

## Attachment A: Monthly VOC Tracking Record

Camcorp Manufacturing  
 Howell County, S33, T27N, R9W  
 Project Number: 2007-08-111  
 Installation ID Number: 091-0081  
 Permit Number:

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

Copy this sheet as needed.

Column 1	Column 2 (a)	Column 3	Column 4	Column 5
Material Used (Name, Type)	Amount of Material Used (Include Units)	Density (Pounds per Gallon)	VOC Content (Weight %)	VOC Emissions (Tons)
Other VOC sources				
(b) Total VOC Emissions Calculated for this Month in Tons:				
(c) 12-Month VOC Emissions Total from Previous Month's Attachment A, in Tons:				
(d) Monthly VOC Emissions Total (b) from Previous Year's Attachment A, in Tons:				
(e) Current 12-month Total of VOC Emissions in Tons: [(b) + (c) - (d)]				

**Instructions: Choose appropriate VOC calculation method for units reported:**

- (a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
- 2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
- 3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
- (b) Summation of [Column 5] in Tons;
- (c) 12-Month VOC emissions total (e) from last month's Attachment A, in Tons;
- (d) Monthly VOC emissions total (b) from previous year's Attachment A, in Tons; and
- (e) Calculate the new 12-month VOC emissions total.

**A 12-Month total of less than 40.0 tons indicates compliance.**





Mr. Eric Metz  
Manufacturing Manager  
Camcorp Manufacturing  
P.O. Box 40  
3 Coastal Dr.  
Willow Springs, MO 65793

RE: New Source Review Permit - Project Number: 2007-08-111

Dear Mr. Metz

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 and with your new source review permit application 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 me at the Departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:jkk

Enclosures

c: Southeast Regional Office  
PAMS File 2007-08-111

Permit Number: