



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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JUL 13 2016

Mr. Randy Pace
EHS Coordinator
Excelsior Springs Seating Systems
301 S. McCleary Rd
Excelsior Springs, Missouri 64024

RE: New Source Review Permit Amendment - Permit Number: 102012-013B
Project Number: 2016-05-037; Installation Number: 047-0191

Dear Mr. Pace:

Excelsior Springs Seating Systems (ESSS) is applying for an amendment to the existing permit #102012-013A in order to increase the production limit on headrest cushions. The previous limit allowed ESSS to produce 800,000 headrest cushions and 1,650,000 seat cushions. The original maximum hourly design rate (MHDR) was unknown; however, ESSS was aware that the facility was capable of higher production rates than those established in the previous construction permit. This amendment seeks to increase the headrest production from 800,000 units a total of 1,400,000 units (an increase of 600,000 units) and leave the seat cushion production limit at 1,650,000 units. The materials are identical to the materials listed in the existing permit, and the new potential emissions calculations account for the increased production of headrest cushions. Although there is an emissions increase, potential emissions of this project are below major source levels and no new permit requirements other than the update to the headrest production limit are being made as a part of this amendment. Therefore, an amendment is being pursued in lieu of a new permit. No new equipment installations or existing equipment modifications are being performed in this project.

Table 1 represents the new installation-wide potential to emit (PTE) for all pollutants after accounting for the headrest cushion production increase. The PTE calculations are based on a limit of 1,650,000 seat cushions & 800,000 headrest cushions (the increase in headrest production).

Table 1: Potential Emissions Summary (tons per year)

| | | | | |
|----------------------|----------------|-----|-------|-----------|
| PM | 25.0 | N/A | 0.02 | 0.27 |
| PM ₁₀ | 15.0 | N/A | 0.02 | 0.23 |
| PM _{2.5} | 10.0 | N/A | 0.02 | 0.23 |
| SO _x | 40.0 | N/A | 0.002 | 0.02 |
| NO _x | 40.0 | N/A | 0.29 | 14.88 |
| VOC | 40.0 | N/A | 22.79 | 95.84 |
| CO | 100.0 | N/A | 0.23 | 4.63 |
| CO _{2e} | 75,000/100,000 | N/A | N/A | 2,631.47 |
| HAPs | 25.0 | N/A | N/A | 0.092 |
| Lead Compounds | 0.01 | N/A | N/A | 0.00001 |
| MDI (101-68-8) | 0.1 | N/A | N/A | 0.00001 |
| Ethylene Oxide (75- | 0.1 | N/A | N/A | 0.01 |
| Propylene Oxide (75- | 5.0 | N/A | N/A | 0.01 |
| 1,4-Dioxane (123-91- | 6.0 | N/A | N/A | 0.01 |
| Acetaldehyde (75-07- | 9.0 | N/A | N/A | 0.01 |
| Formaldehyde (50-00- | 2.0 | N/A | N/A | 0.01 |
| Arsenic Compounds | 0.01 | N/A | N/A | 0.000004 |
| Benzene (71-43-2) | 2.0 | N/A | N/A | 0.001 |
| Beryllium | 0.008 | N/A | N/A | 0.0000002 |
| Cadmium Compounds | 0.01 | N/A | N/A | 0.00002 |
| Chromium | 5.0 | N/A | N/A | 0.00003 |
| Cobalt Compounds | 0.1 | N/A | N/A | 0.000002 |
| Dichlorobenzene | 3.0 | N/A | N/A | 0.00002 |
| Hexane (110-54-3) | 10.0 | N/A | N/A | 0.04 |
| Manganese | 0.8 | N/A | N/A | 0.00001 |
| Mercury Compounds | 0.01 | N/A | N/A | 0.00001 |
| Naphthalene (91-20- | 10.0 | N/A | N/A | 0.0002 |
| Nickel Compounds | 1.0 | N/A | N/A | 0.00004 |
| Polycyclic Organic | 0.01 | N/A | N/A | 0.0001 |
| Selenium Compounds | 0.1 | N/A | N/A | 0.0000005 |
| Toluene (108-88-3) | 10.0 | N/A | N/A | 0.0005 |
| Acrolein | 0.04 | N/A | N/A | 0.00001 |
| Xylene (1330-20-7) | 10.0 | N/A | N/A | 0.0003 |

Mr. Pace
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Special Conditions in this amendment account for the increased production rate by raising the allowed number of headrest from 800,000 units to 1,400,000 units. The tracking sheet (Attachment A) has been modified accordingly, and is included in this permit amendment for use upon issuance of this permit amendment. The special conditions in this permit replace the production-limiting special conditions from the existing permit; the tracking sheet included in this amendment accounts for the increased production limit, and should be used in place of the existing tracking sheet (provided in permit #102012-013A).

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale
Permits Section Chief

KBH:csj

Enclosures

c: Kansas City Regional Office
PAMS File: 2016-05-037

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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."

Excelsior Springs Seating Systems
Clay County, S10, T50N, R30W

1. **Superseding Condition**

The conditions of this permit supersede the following special conditions found in the previously issued construction permit #102012-013A issued by the Air Pollution Control Program.

A. Special Condition 2.

2. **Production Limitation**

A. Excelsior Springs Seating Systems (ESSS) shall limit their production of seat cushions (pads) to 1,650,000 units in any consecutive 12-month period.

B. ESSS shall limit their production of headrests and armrests (combined) to 1,400,000 units in any consecutive 12-month period.

C. ESSS shall record the number of pads, headrests, and armrests produced each month and shall also calculate the 12-month rolling total number of pads, headrests, and armrests produced each month using Attachment A (provided in permit #102012-013B).

