



PART 70 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 herein.

Operating Permit Number: ~~OP2011-023~~
Expiration Date: ~~MAY 16 2011~~ MAY 16 2016
Installation ID: 207-0019
Project Number: 2004-12-001

Installation Name and Address

W.W. Wood Products
Old Hwy. 60 - Filley - Brenda - Main - Stanley Streets
Dudley, MO 63936-0785
Stoddard County

Parent Company's Name and Address

W.W. Wood Products
P.O. Box 785
Dudley, MO 63936-0785

Installation Description:

W.W. Wood Products, Inc. is a manufacturer of wood kitchen and bath cabinetry. Major emission units are wood working equipment including saws, planers, sanders, shapers and molders; surface coating booths; adhesive application booths; scrap wood grinders; a sawdust fired boiler, and an incinerator/air curtain destructor. The installation is a major source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

Effective Date MAY 17 2011

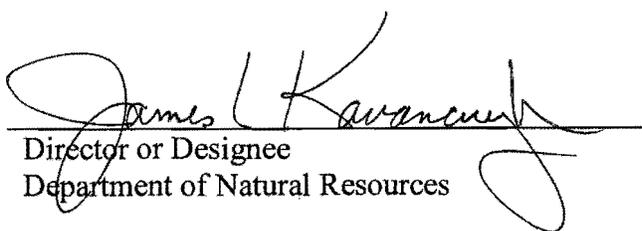

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

W.W. Wood Products, Inc. is a manufacturer of wood kitchen and bath cabinetry. Major emission units are wood working equipment including saws, planers, sanders, shapers and molders; surface coating booths; adhesive application booths; scrap wood grinders; a sawdust fired boiler, and an incinerator/air curtain destructor. The installation is a major source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2009	11.85	0.01	0.002	0.44	160.51	0.08	--	38.43
2008	9.02	0.11	0.02	3.76	205.81	0.64	--	30.91
2007	9.38	0.12	0.01	2.47	227.32	0.50	--	42.15
2006	8.69	0.54	0.05	2.99	239.36	1.35	--	96.84
2005	23.53	11.99	0.676	5.79	169.84	1.92	--	87.28

EMISSION UNITS WITH LIMITATIONS

The following list provides a brief description of the equipment sorted by location and control device, at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Description of Emission Unit

Wood Working Operations (Grouped by Building)
 Coating Operations (Grouped by Building)
 General Equipment (Used In All Divisions)

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

EP-11	Heating	Space Heaters for all Buildings
EP-14	Hauling	Haul Roads (gravel/pavement)
EP-G3	Banding	Old Molding Room/Storage/Banding
EP-G4	Storage	Stacking Pads
EP-D05	Cutting	Wood Hog

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1. Missouri Department of Natural Resources Construction Permit #012006-010A
2. Missouri Department of Natural Resources Construction Permit #102001-008

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.

Wood Working Operations - Shiloh Cabinetry Division - 12140 Main Street					
Emission Unit #	Unit Type	Unit Description/Model	Control Device ID /Type	EIQ Reference Number #	Applicable Permit Conditions
A211	Sander	Cemco 8 Head Sander	CD-A21 Dust Collectors - 6 Bag Units for 8 Head Sander	A-21, A-22, A-23, A-24, A-69, A-70	FM1, FM2
A252	Cutting	Castle Machine	CD-A25/Dust Collector	A-25	
A253	Cutting	Castle Machine			
A261	Routing	Powermatic 1/2" Router	CD-A26/Dust Collector	A-26	
A272	Routing	Powermatic 3/8" Router	CD-A27/Dust Collector	A-27	
A281	Routing	Powermatic 3/8" Router	CD-A28/Dust Collector	A-28	
A291	Cutting	Whirlwind 1000RH	CD-A29/Dust Collector	A-29	
A292	Cutting	Whirlwind 1000RH			
A301	Cutting	Whirlwind 1000RH	CD-A30/Dust Collector	A-30	
A302	Cutting	Whirlwind 1000RH			
A311	Cutting	Whirlwind 1000RH	CD-A31/Dust Collector	A-31	
A312	Cutting	Whirlwind 1000 RH			
A321	Cutting	Cemco Volunteer	CD-A32/Dust Collector	A-32	
A331	Cutting	Quickwood Pro 1400	CD-A33/Dust Collector	A-33	
A341	Cutting	Sorbini	CD-A34/Dust Collector	A-34	
A342	Cutting	Optimat			
A351	Cutting	Sorbini	CD-A35/Dust Collector	A-35	

Wood Working Operations - Sequoia Cabinetry Division – Water Street					
Emission Unit #	Unit Type	Unit Description	Control Device ID/Type	EIQ Emission Point #	Applicable Permit Conditions
B81	Panel Cut	Holzma	CD-B8 /Dust Collector	B-8	FM1, FM2
B91	Cutting	Castle Machine	CD-B9/Dust Collector	B-9	
B92	Cutting	Castle Machine			
B93	Cutting	Rip Saw			
B101	Cutting	Edge Bander	CD-B10/Dust Collector	B-10	
B113	Cutting	Table Saw	CD-B12/Dust Collector	B-12	
B121	Panel Cut	Panel Router			
B131	Panel Cut	Shaper	CD-B13/Dust Collector	B-13	
B133	Panel Cut	CTD Machine			
B142	Panel Cut	Shaper			
B143	Panel Cut	Shaper			
B151, B152	Frame Setup	Whirlwind Chop Saws	CD-B15/Dust Collector	B-15	
B161	Speciality	Table Saw 66TA	CD-B16/Dust Collector	B-16	
B171	Frame Setup	Cemco Sander 3000	CD-B17/Dust Collector	B-17	
B181	Frame Setup	Cemco Sander 3000	CD-B18/Dust Collector	B-18	
B191	Drawer Setup	Table Saw 66TA	CD-B19/Dust Collector	B-19	
B221	Cutting	CNC Router	CD-B22/Dust Collector	B-22	
Wood Working Operations - Cabinet Door Production Division					
C301, C302	Sanding	Timesaver Sander	CD-C3/Dust Collector	C-3	FM1, FM2
C401, C402	Sanding	Timesaver Sander	CD-C4/Dust Collector	C-4	

PERMIT CONDITION FM1	
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes	
<i>Condition applicable to units listed in the two preceding tables titled:</i>	
<i>Wood Working Operations - Shiloh Cabinetry Division - 12140 Main Street, &</i>	
<i>Wood Working Operations - Sequoia Cabinetry Division – Water Street</i>	

Operational Requirements:

- 1.) This unit is provided conditional exemptions from this rule per §6.400(1)(B)8, & §6.400(1)(B)15.
- 2.) The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring and maintenance requirements for the associated control device.

Operating/Monitoring Requirements:

- 1.) Emission units equipped with a dust collector system shall not be operated without a filter in place.
- 2.) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3.) The filters shall be inspected before each shift and after installation of a new filter.
- 4.) The manufacturer’s recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Record Keeping:

- 1.) The permittee shall maintain records of the inspections of the associated dust collector and filter (See Attachment C).
- 2.) Attachment C contains a log including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 3.) These records shall be made available immediately for inspection to the Department of Natural Resource' personnel upon request.
- 4.) All records shall be maintained for five years.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition FM2
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants
<i>Condition applicable to units listed in the two preceding tables titled: Wood Working Operations - Shiloh Cabinetry Division - 12140 Main Street, & Wood Working Operations - Sequoia Cabinetry Division – Water Street</i>

Emission Limitation:

- 1.) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
- 2.) Exception: A person 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 percent.

Monitoring, Recordkeeping and Reporting:

The monitoring, recordkeeping and reporting requirements for this condition are placed under the 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants heading in the Core Permit Requirements Section (Section IV) of this permit.

Wood Working Operations - Cabinet Door Production Division				
Emission Units Collected/Vented Into Control Device: South Bag House (CD-C1)				
Emission Unit #	Unit Function	Unit Description	2008 EIQ Reference #	Applicable Conditions
C101, C102	Cutting	Dimter Opticut 350-4	EP-C1	FM3, FM4
C104, C105, C106, C107, C108, C109	Cutting	Whirlwind 1000L		
C110, C111, C112, C113	Shaping	Reserved for future use		
C114	Cutting	Whirlwind 212R		
C115, C116, C117, C118	Cutting	Whirlwind 1000		
C119	Cutting	Whirlwind 1000L		
C120	Shaping	Ritter Roundover		
C121	Shaping	Ritter Shaper R15		

C122, C123, C124, C125	Cutting	Unique 310		
C132	Cutting	Powermatic Table Saw 66-TA		
C133	Cutting	Powermatic Table Saw 66		
C135	Cutting	Whirlwind 220		
C136, C137	Cutting	Whirlwind 216		
C138, C139	Cutting	Timesaver 237		
C140	Cutting	Jenkins JDM		
C142	Shaping	Davis and Wells Shaper FS-2-84		
C143	Shaping	Powermatic Shaper 26		
C144	Shaping	Delta Shaper 43-375		
C145	Shaping	Davis and Wells Shaper FS-2-87		
C146	Shaping	Davis and Wells Shaper FS-2-64		
C147, C148	Shaping	Delta Shaper 43-385		
C149	Cutting	Unique 310		
C150	Shaping	SCMI Shaper T110B		
C151	Cutting	Voorwood		
C152	Shaping	Davis and Wells Shaper FS-264		
C153, C154, C155	Sanding	Heeseman Sander		
C156	Cutting	Voorwood		
C157	Cutting	Miter Saw		
C158	Cutting	Unique 310		
C159	Cutting	Voorwood		
C160	Cutting	Unique 310		
C161, C162, C163	Shaper	Delta Shaper		

Emission Units Collected/Vented Into Control Device: North Bag House (CD-C2)

Emission Unit #	Unit Function	Unit Description	2008 EIQ Reference #	Applicable Conditions
C126	Cutting	Balestrini Pico	EP-C2	FM3, FM4
C127	Shaper	Davis & Wells Shaper FS-2-64		
C128	Shaper	SCMI Shaper T110B		
C129	Cutting	Balestrini Micron		
C130	Cutting	Balestrini Pico		
C131, C141	Shaper	Davis & Wells Shaper FS-2-87		
C201, C202	Cutting	Jenkins JDM		
C203	Cutting	Unique		
C204	Cutting	Powermatic 26		
C205	Cutting	Voorwood A117DC		
C206	Sanding	Sanding Table # 1		
C207	Sanding	Sanding Table # 2		
C208	Cutting	SawStop Table Saw CB53480		
C209, C210	Sanding	Timesaver 7-Head		
C211	Sanding	Cemco Sander P28G12C-G7-ZC		
C212	Cutting	W.W. Panel Bearer		
C213	Cutting	Progressive 5044		
C214	Sanding	Oakley Edge Sanding Table H5		
C215	Cutting	Porter Cable Type 7		
C216	Cutting	Porter Cable Type 5		
C217	Shaping	Delta Shaper 43-340		
C218	Cutting	Castle Mortising Machine TSM-35		

C219	Cutting	Jenkins JDM	EP-C2	FM3, FM4
C220, C221	Cutting	Voorwood A117DC		
C222, C223	Cutting	Voorwood A117IH		
C224	Sanding	Timesaver 200 Orbital 37-30-B		
C225	Cutting	Pistorius Double Miter Saw MN-200		
C226	Sanding	Sanding Table # 3		
C227	Sanding	Sanding Table # 4		
C228	Cutting	Blum Mini-Press 2002		
C229	Cutting	Whirlwind 212		
C230	Cutting	Powermatic 66		
C231	Sanding	Heeseman Sander		
C232	Sanding	Heeseman Sander		
C233	Shaper	Delta Industrial Shaper		
C234, C235	Shaping	Whirlwind		
C236	Shaping	Whirlwind 1000L		
C237, C238	Shaping	Whirlwind 1000		
C239	Shaping	Whirlwind 1000R		
C240	Shaper	Delta Shaper 43-341		
C241	Cutting	Balestrini		
C242	Cutting	Voorwood		
C243	Cutting	Chop Saw		
C244	Shaping/Sanding	Voorwood Shaper/Sander		
C245	Shaping	Shaper		
C246	Cutting	Miter Saw		
C247	Cutting	Chop Saw		
C248	Cutting	Jenkins JDM		
C249, C250	Cutting	Sawstop Table Saw		

PERMIT CONDITION FM3

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Condition applicable to emission units collected/vented into control devices (ID #):

South Bag House (CD-C1), North Bag House (CD-C2), Baghouse #3 (CD-C3), Baghouse #4 (CD-C4)

Operational Requirements:

- 1.) These units are provided conditional exemptions from this rule per §6.400(1)(B)8, & §6.400(1)(B)15.
- 2.) The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring and maintenance requirements for the associated control device.

Control Equipment Operation, Monitoring and Maintenance Parameters:

- 1.) The baghouse system must be in use at all times these units are in operation to maintain the conditional exemption from this rule.
- 2.) The permittee shall calibrate, maintain and operate the baghouses and their respective instrumentation according to the manufacturer's specifications and recommendations.
- 3.) These emission units shall not be operated without fabric filters in place in all baghouses that service these emission units.
- 4.) The pressure drop across the baghouse filters shall be maintained within the design conditions specified by the manufacturer's performance warranty.

- a) If the pressure drop falls out of this normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal.
 - b) If corrective action cannot be taken within eight (8) hours, the affected baghouse ventilation system will either be shut down, or will be directed such that the emissions from the affected baghouse are vented back into the building.
 - c) A pressure drop reading of less than two (2) inches may be observed for a period following the installation of a new bag.
- 5.) Replacement filters shall be kept on hand at all times and be made of fibers appropriate for the operating conditions that are expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring:

- 1.) The permittee shall check the baghouse pressure drop daily.
- 2.) The permittee shall thoroughly inspect fabric filters for leaks and wear semi-annually.
- 3.) If leaks or abnormal conditions are detected, the appropriate measures for remediation shall be implemented within eight (8) hours.

Record Keeping:

- 1.) The permittee shall maintain records of the daily pressure drop readings.
- 2.) The permittee shall maintain records of all inspections of each baghouse.
- 3.) The permittee shall maintain records of all fabric filter replacements and maintenance performed.
- 4.) Attachments B and C contain logs including these record keeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5.) All records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 6.) All records shall be maintained for a period of five (5) years.

Permit Condition FM-4

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Condition applicable to emission units collected/vented into control devices (ID #):

South Bag House (CD-C1), North Bag House (CD-C2), Baghouse #3 (CD-C3), Baghouse #4 (CD-C4)

Emission Limitation:

- 1.) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
- 2.) Exception: A person 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 percent.

Monitoring, Recordkeeping and Reporting:

The monitoring, recordkeeping and reporting requirements for this condition are placed under the 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants heading in the Core Permit Requirements Section (Section IV) of this permit.

Wood Working Operations - Saw Mill Production Division					
Emission Unit #	Unit Function	Unit Description	Control Device Description	EIQ Emission Point	Applicable Conditions
D101	Cutting	Mareen-Johnson Rip Saw	CD-D1 Cyclone (Rees 38 KL) South	STRAIGHT LINE RIP SAW (D-1)	FM5
D102	Cutting	Mareen-Johnson Rip Saw			
D103	Cutting	Mareen-Johnson Rip Saw			
D104	Cutting	Mareen-Johnson Rip Saw			
D105	Cutting	Mareen-Johnson Rip Saw			
D106	Cutting	Mareen-Johnson Rip Saw			
D107	Cutting	Mareen-Johnson Rip Saw			
D108	Cutting	Mareen-Johnson Rip Saw			
D201	Planing	Newman Planer	CD-D2 Cyclone (Rees 38 KL) Middle	PLANER & MOULDER (D-2)	FM5
D202	Planing	Newman Planer			
D203	Planing	Newman Planer			
D204	Planing	Newman Planer			
D205	Cutting	CAN TEK Leadermac			
D206	Cutting	Moulder			
D301	Cutting	Weinig Moulder	CD-D3 Cyclone (Rees 38 KL) North	PLANER & MOULDER (D-3)	FM5
D302	Cutting	Weinig Moulder			
D303	Cutting	Weinig Moulder			
D304	Cutting	Weinig Moulder			

Wood Working Operations - New Product Development Custom Division Building Dove Tail Drawers and Specialty/Experimental - Located on Corner of Brenda & Main Street					
Emission Unit #	Unit Function	Unit Description	Control Device Description	EIQ Emission Point	Applicable Conditions
F301	Planer	Northfield Planer	CD-F3 CD-F3 Cyclone	F-3	FM5
F302	Cutting	Timesaver Topsaw 48"			
F303	Cutting	Powermatic Table Saw 66 TA			
F304	Shaping	Ritter Shaper RIDL			
F305	Shaping	Ritter Shaper RIDL			
F306	Shaping	Ritter Shaper RIDL			
F307	Shaping	Powermatic Shaper TS 110			
F308	Shaping	US Concepts Arch Shaper FASCX			
F309	Cutting	Tannewirt Bandsaw GH			
F310	Cutting	Bosch Chop Saw			
F311	Cutting	Altendorf F45			
F312	Sander	Carstens Belt Sander			
F313	Cutting	Powermatic Table Saw 66 TA			
F314	Shaping	Delta Shaper 13-3857			
F315	Shaping	Davis Wells Shaper FS287			
F316	Shaping	Northfield Shaper 12-HD			
F318	Cutting	Centanio 7AF1600 Lathe			
F319	Cutting	Lydall Rip Saw			
F320	Cutting	Powermatic Table Saw			

F321	Cutting	Dewalt Miter Saw DW 718		W/SHAPER PLANER (F-3)	
F323	Cutting	Castle Machine			
F324	Cutting	Whirlwind			
F325	Cutting	Bosch Router on WW made table			
F326	Cutting	Hitachi 15" Miter Saw			
F327	Cutting	Router Table			
F328	Cutting	Saw Stop 10" Table Saw			
F329	Cutting	Whirlwind			
F330	Cutting	CR Onsrud 5 Axis Router			
F331	Cutting	Timesaver 100 Sander/Planer			
F332	Cutting	Lathe			
F333	Cutting	Suck Tube for 5 Axis			
F334	Cutting	Centauro Sanding Lathe			
F335	Cutting	Intorex Lathe			
F401	Cutting	Whirlwind 212			
F402	Cutting	Whirlwind 1000L			
F403	Shaping	Powermatic Shaper 27 Shaper			
F405	Cutting	Old Holzma			
F406	Cutting	Homag Edgebander			
F407	Shaping	Powermatic Shaper			
F409	Cutting	Rollout Grover/ Notcher			
F410	Cutting	Powermatic Rip Saw			
F411	Cutting	Notcher			
F412	Cutting	Dodds			
F413	Cutting	Notcher			
F501	Shaping	Powermatic Shaper 66			
F502	Shaping	Dovetail Rollout Shaper/Router			
F601	Cutting	Powermatic Table Saw 66			
F701	Sander	Oakley Belt Sander M15			
F801	Shaping	Powermatic 27 Shaper			
F802	Shaping	Dodds Shaper SE-1			

PERMIT CONDITION FM-5

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Condition applicable to emission units reported as emission points; D-1, D-2, D-3, F-3, F-4

Emission Limitation:

- 1.) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
- 2.) Exception: A person 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 percent.

Monitoring, Recordkeeping and Reporting:

The monitoring, recordkeeping and reporting requirements for this condition are placed under the 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants heading in the Core Permit Requirements Section (Section IV) of this permit.

Coating Operations - Shiloh Cabinetry Division Paint Booths				
Emission Point No.	Emission Unit Type	Emission Unit Description	Control Device Type	Applicable Permit Conditions
A-1	Painting	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-2	Painting	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-3	Seal Coat	Blow Off Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-4	Painting	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-5	Painting	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-6	Glazing	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-7	Seal Coat	Blow Off Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-8	Top Coats	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-9	Top Coats	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-10	Glazing	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-11	Seal Coat	Blow Off Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-12	Top Coat	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-13	Repair Booth	Spray Booth	Fabric Filters	PB-1, PB-2, PB-5, PB-6
A-14	Seal/Top Coat	Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
A-15	Glazing	Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
A-16	Spray Staining	Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
A-17	Wipe Staining	Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
A-18	Wipe Staining	Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
A-65	Top Coat	Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
A-66	Top Coat	Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
A372	Top Coat	Cefla/Easy 2000 #1	CD-A37/RTO	PB-1, PB-2, PB-4, PB-6
A373	Top Coat	Cefla/Easy 2000 #2		PB-1, PB-2, PB-4, PB-6
A374	Top Coat	Cefla/Easy 2000 #3		PB-1, PB-2, PB-4, PB-6
A375	Top Coat	Cefla/Easy 2000 #4		PB-1, PB-2, PB-4, PB-6

Coating Operations - Sequoia Cabinetry Division Paint Booths				
Emission Point No.	Emission Unit Type	Emission Unit Description	Control Device Type	Applicable Permit Conditions
B-1	Wipe Stains	Spray Booth	Fabric Filter	PB-1, PB-2, PB-3, PB-5, PB-6
B-2	Seal Coat	Spray Booth	Fabric Filter	PB-1, PB-2, PB-3, PB-5, PB-6
B-3	Top Coat	Spray Booth	Fabric Filter	PB-1, PB-2, PB-3, PB-5, PB-6
B-4	Blow off	Blow-off Booth	Fabric Filter	PB-1, PB-2, PB-3, PB-5, PB-6
B-5	Spray Stains	Hanging Line Spray Booth	Fabric Filter	PB-1, PB-2, PB-3, PB-5, PB-6
B-6	Seal Coat	Hanging Line Spray Booth	Fabric Filter	PB-1, PB-2, PB-3, PB-5, PB-6
B-7	Top Coat	Hanging Line Spray Booth	Fabric Filter	PB-1, PB-2, PB-4, PB-6
B-20	Wipe Stains	Spray Booth	Fabric Filter	PB-1, PB-2, PB-4, PB-6
B-21	Seal Coat	Spray Booth	Fabric Filter	PB-1, PB-2, PB-4, PB-6

Coating Operations - Cabinet Door Production Division - Gluers			
Emission Point #	Unit Function	Unit Description	Applicable Permit Condition(s)
EP-C7	Gluing	6 - Cabinet Door Panel Gluers	PB-1, PB-2, C7-1

Coating Operations - Old House Doors - Spray Booth				
Emission Point #	Unit Function	Unit Description	Control Device	Applicable Permit Condition(s)
EP-E1	Seal Coat	Spray Booth	Fabric Filter	PB-1, PB-2, PB-5, PB-6

Coating Operations - New Product Development Custom Division Building Spray Paint Booths			
Emission Point #	Unit Description	Control Device	Applicable Permit Condition(s)
F-1	Seal Coat Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6
F-2	Top Coat Spray Booth	Fabric Filters	PB-1, PB-2, PB-4, PB-6

Permit Condition PB-1	
10 CSR 10-6.075	<p>Maximum Achievable Control Technologies Regulations 40 CFR Part 63 Subpart JJ 40 CFR Part 63 Subpart A</p> <p>National Emission Standards for Wood Furniture Manufacturing Operations -- Work Practice Standards §63.803 - General Provisions <i>Work Practice Standards Applicable to all coating operations</i></p>

Work Practice Implementation Plan:

- 1.) Each owner or operator of an affected source shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in §63.803(b) through (l). The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Director upon request. If the Director determines that the work practice implementation plan does not adequately address each of the topics specified in §63.803(b) through (l) or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Director may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source’s Title V permit. [\[§63.803\(a\)\]](#)
- 2.) *Operator training course.* Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of Subpart JJ. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following: [\[§63.803\(b\)\]](#)
 - a) A list of all current personnel by name and job description that are required to be trained; [\[§63.803\(b\)\(1\)\]](#)
 - b) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel; [\[§63.803\(b\)\(2\)\]](#)
 - c) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and [\[§63.803\(b\)\(3\)\]](#)

- d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion. [§63.803(b)(4)]
- 3.) *Inspection and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies: [§63.803(c)]
 - a) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents; [§63.803(c)(1)]
 - b) An inspection schedule; [§63.803(c)(2)]
 - c) Methods for documenting the date and results of each inspection and any repairs that were made; [§63.803(c)(3)]
 - d) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule: [§63.803(c)(4)]
 - 1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and [§63.803(c)(4)(1)]
 - 2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months. [§63.803(c)(4)(2)]
- 4.) *Cleaning and washoff solvent accounting system.* Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record: [§63.803(d)]
 - a) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 of Subpart JJ; [§63.803(d)(1)]
 - b) The number of pieces washed off, and the reason for the washoff; and [§63.803(d)(2)]
 - c) The quantity of spent HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite. [§63.803(d)(3)]
- 5.) *Chemical composition of cleaning and washoff solvents.* Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA. [§63.803(e)]
- 6.) *Spray booth cleaning.* Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating. [§63.803(f)]
- 7.) *Storage requirements.* The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials. [§63.803(g)]
- 8.) *Application equipment requirements.* Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances: [§63.803(h)]
 - a) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied; [§63.803(h)(1)]
 - b) For touchup and repair under the following conditions: [§63.803(h)(2)]
 - 1) The touchup and repair occurs after completion of the finishing operation; or [§63.803(h)(2)(i)]
 - 2) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons. [§63.803(h)(2)(ii)]

- c) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually; [\[§63.803\(h\)\(3\)\]](#)
- d) When emissions from the finishing application station are directed to a control device; [\[§63.803\(h\)\(4\)\]](#)
- e) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semi-annual period; or [\[§63.803\(h\)\(5\)\]](#)
- f) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Director a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility: [\[§63.803\(h\)\(6\)\]](#)
 - 1) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or [\[§63.803\(h\)\(6\)\(i\)\]](#)
 - 2) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain. [\[§63.803\(h\)\(6\)\(ii\)\]](#)
- 9.) *Line cleaning.* Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container. [\[§63.803\(i\)\]](#)
- 10.) *Gun cleaning.* Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container. [\[§63.803\(j\)\]](#)
- 11.) *Washoff operations.* Each owner or operator of an affected source shall control emissions from washoff operations by: [\[§63.803\(k\)\]](#)
 - a) Using normally closed tanks for washoff; and [\[§63.803\(k\)\(1\)\]](#)
 - b) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible. [\[§63.803\(k\)\(2\)\]](#)
- 12.) *Formulation assessment plan for finishing operations.* The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that: [\[§63.803\(l\)\]](#)
 - a) Identifies VHAP from the list presented in Table 5 of Subpart JJ that are being used in finishing operations by the affected source; [\[§63.803\(l\)\(1\)\]](#)
 - b) Establishes a baseline level of usage by the affected source, for each VHAP identified in §63.803(l)(1). The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified §63.803(l)(1). For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in §63.805(d) or (e). [\[§63.803\(l\)\(2\)\]](#)
 - c) Tracks the annual usage of each VHAP identified in §63.803(l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA. [\[§63.803\(l\)\(3\)\]](#)
 - d) If, after November 1998, the annual usage of the VHAP identified in §63.803(l)(1) exceeds its baseline level, then the permittee shall provide a written notification to the permitting authority

that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the permittee from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP: [\[§63.803\(1\)\(4\)\]](#)

- 1) The exceedance is no more than 15.0 percent above the baseline level; [\[§63.803\(1\)\(4\)\(i\)\]](#)
 - 2) Usage of the VHAP is below the *de minimis* level presented in Table 5 of Subpart JJ that HAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in §63.805(d) or (e); [\[§63.803\(1\)\(4\)\(ii\)\]](#)
 - 3) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or [\[§63.803\(1\)\(4\)\(iii\)\]](#)
 - 4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied. [\[§63.803\(1\)\(4\)\(iv\)\]](#)
- e) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress. [\[§63.803\(1\)\(5\)\]](#)
- f) If after November 1998, an affected source uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in the same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in §63.803(1)(6) that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in Table 6 of Subpart JJ for that chemical then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in §63.803(1)(4)(i) through (1)(4)(iv), the affected source shall follow the procedures in §63.803(1)(5). [\[§63.803\(1\)\(6\)\]](#)

Record Keeping:

- 1.) The owner or operator of an affected source subject to the work practice standards in §63.803 of Subpart JJ shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to: [\[§63.806\(e\)\]](#)
 - a) Records demonstrating that the operator training program required by §63.803(b) is in place; [\[§63.806\(e\)\(1\)\]](#)
 - b) Records collected in accordance with the inspection and maintenance plan required by §63.803(c); [\[§63.806\(e\)\(2\)\]](#)
 - c) Records associated with the cleaning solvent accounting system required by §63.803(d); [\[§63.806\(e\)\(3\)\]](#)

- d) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semi-annual period as required by §63.803(h)(5). [\[§63.806\(e\)\(4\)\]](#)
 - e) Records associated with the formulation assessment plan required by §63.803(l); and [\[§63.806\(e\)\(5\)\]](#)
 - f) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed. [\[§63.806\(e\)\(6\)\]](#)
- 2.) The owner or operator of an affected source subject to the emission limits in §63.802 and following the compliance provisions of §63.804(g)(8) shall maintain records of the compliance certifications submitted in accordance with §63.807(c) for each semi-annual period following the compliance date. [\[§63.806\(h\)\]](#)
 - a) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by §63.9(h) and §63.807(b) and the semi-annual reports required by §63.807(c). [\[§63.806\(h\)\(1\)\]](#)
 - 3.) The owner or operator of an affected source shall maintain all records in accordance with the requirements of §63.10(b)(1). [\[§63.806\(j\)\]](#)

Reporting:

- 1.) Owners or operators of an affected source subject to the work practice standards in §63.803 shall submit a compliance certification with the semi-annual report required by §63.807(c). [\[§63.804\(g\)\(8\)\]](#)
 - a) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation. [\[§63.804\(g\)\(8\)\(i\)\]](#)
 - b) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [\[§63.804\(g\)\(8\)\(ii\)\]](#)
- 2.) The owner or operator of an affected source subject to Subpart JJ shall fulfill all reporting requirements of §63.7 through §63.10 of Subpart A (General Provisions) according to the applicability criteria in §63.800(d) of Subpart JJ. [\[§63.807\(a\)\]](#)
- 3.) The owner or operator of an affected source demonstrating compliance in accordance with §63.804(g)(8) shall submit a report covering the previous six months of wood furniture manufacturing operations: [\[§63.807\(c\)\]](#)
 - a) Reports shall be submitted 30 calendar days after the end of each six-month period following the first report. [\[§63.807\(c\)\(2\)\]](#)
 - b) The semi-annual reports shall include the information required by §63.804(g)(8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance. [\[§63.807\(c\)\(3\)\]](#)
 - c) The frequency of the reports required by §63.807(c) shall not be reduced from semi-annually regardless of the history of the owner's or operator's compliance status. [\[§63.807\(c\)\(4\)\]](#)
- 4.) The owner or operator of an affected source required to provide a written notification under §63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred. [\[§63.807\(e\)\]](#)

Permit Condition PB-2

10 CSR 10-6.075

Maximum Achievable Control Technologies Regulations

40 CFR Part 63 Subpart JJ

National Emission Standards for Wood Furniture Manufacturing Operations

40 CFR Part 63 Subpart A

General Provisions

Applies to all surface coating operations at this facility

Emission Limitation:

- 1.) Each owner or operator of a new affected source subject to Subpart JJ shall limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of Subpart JJ, (see Attachment F), using the compliance method in §63.804(d). [\[§63.802\(b\)\(1\)\]](#)
 - a) The permittee shall comply with those provisions of §63.802(b)(1) by using one of the following methods: [\[§63.804\(d\)\]](#)
 - 1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8; [\[§63.804\(d\)\(1\)\]](#)
$$E = \frac{(M_{c1}C_{c1} + M_{c2}C_{c2} + *** + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + *** + S_nW_n)}{(M_{c1} + M_{c2} + *** + M_{cn})} \quad (\text{Eq. 1})$$
 - 2) Use compliant finishing materials according to the following criteria: [\[§63.804\(d\)\(2\)\]](#)
 - A. Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; [\[§63.804\(d\)\(2\)\(i\)\]](#)
 - B. Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and [\[§63.804\(d\)\(2\)\(ii\)\]](#)
 - C. Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight. [\[§63.804\(d\)\(2\)\(iii\)\]](#)
 - 3) Use any combination of an averaging approach, as described §63.804(d)(1), and compliant finishing materials, as described in §63.804(d)(2). [\[§63.804\(d\)\(4\)\]](#)
 - 4) To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in §63.803(l)(2) for determining styrene and formaldehyde usage. [\[§63.802\(b\)\(1\)\]](#)
 - 2.) Each owner or operator of a new affected source subject to Subpart JJ shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied. [\[§63.802\(b\)\(3\)\]](#)

Monitoring:

- 1.) *Continuous compliance demonstrations.* Owners or operators of an affected source subject to the provisions of §63.802(b)(1) that comply through the procedures established in §63.804(d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semi-annual period and submitting a compliance certification with the semi-annual report required by §63.807(c). [§63.804(g)(1)]
 - a) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 0.8 for new sources. An affected source is in violation of the standard if E is greater than 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period. [§63.803(g)(1)(i)]
 - b) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [§63.803(g)(1)(ii)]
- 2.) Owners or operators of an affected source subject to the provisions of §63.802(b)(1) that comply through the procedures established in §63.804(d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semi-annual report required by §63.807(c). [§63.804(g)(2)]
 - a) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semi-annual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used. [§63.804(g)(2)(i)]
 - b) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [§63.804(g)(2)(ii)]
- 3.) Owners or operators of an affected source subject to the provisions of §63.802(b)(1) that are complying through the procedures established in §63.804(d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in §63.804(g)(3)(i) or (ii). [§63.804(g)(3)]
 - a) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semi-annual report required by §63.807(c). [§63.804(g)(3)(i)]
 - 1) The compliance certification shall state that compliant coatings have been used each day in the semi-annual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used. [§63.804(g)(3)(i)(A)]
 - 2) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [§63.804(g)(3)(i)(B)]
 - b) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semi-annual report required by §63.807(c). [§63.804(g)(3)(ii)]

- 1) The compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semi-annual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semi-annual reporting period. [\[§63.804\(g\)\(3\)\(ii\)\(A\)\]](#)
- 2) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [\[§63.804\(g\)\(3\)\(ii\)\(B\)\]](#)
- 3) An affected source is in violation of the standard when a sample of the as applied coating exceeds the applicable limit established in §63.804(d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating. [\[§63.804\(g\)\(3\)\(ii\)\(C\)\]](#)
- 4.) Owners or operators of an affected source subject to the provisions of §63.802(b)(3) shall submit a compliance certification with the semi-annual report required by §63.807(c). [\[§63.804\(g\)\(7\)\]](#)
 - a) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semi-annual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard. [\[§63.804\(g\)\(7\)\(i\)\]](#)
 - b) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [\[§63.804\(g\)\(7\)\(ii\)\]](#)

Record Keeping:

- 1.) The owner or operator of an affected source subject to Subpart JJ shall fulfill all recordkeeping requirements of §63.10 of Subpart A, according to the applicability criteria in §63.800(d) of Subpart JJ. [\[§63.806\(a\)\]](#)
- 2.) The owner or operator of an affected source subject to the emission limits in §63.802 of Subpart JJ shall maintain records of the following: [\[§63.806\(b\)\]](#)
 - a) A certified product data sheet for each finishing material, thinner, and strippable spray booth coating subject to the emission limits in §63.802; and [\[§63.806\(b\)\(1\)\]](#)
 - b) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material subject to the emission limits in §63.802; and [\[§63.806\(b\)\(2\)\]](#)
 - c) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in §63.802(b)(3). [\[§63.806\(b\)\(3\)\]](#)
- 3.) The owner or operator of an affected source following the compliance method in §63.804(d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1. [\[§63.806\(c\)\]](#)
- 4.) The owner or operator of an affected source following the compliance procedures of §63.804(g)(3)(ii) shall maintain the records required by §63.806(b) as well as records of the following: [\[§63.806\(d\)\]](#)
 - a) Solvent and coating additions to the continuous coater reservoir; [\[§63.806\(d\)\(1\)\]](#)
 - b) Viscosity measurements; and [\[§63.806\(d\)\(2\)\]](#)
 - c) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance. [\[§63.806\(d\)\(3\)\]](#)

- 5.) The owner or operator of an affected source subject to the emission limits in §63.802 and following the compliance provisions of §63.804(g)(1), (2), (3), and (7) shall maintain records of the compliance certifications submitted in accordance with §63.807(c) for each semi-annual period following the compliance date. [§63.806(h)]
 - a) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by §63.9(h) and §63.807(b) and the semi-annual reports required by §63.807(c). [§63.806(h)(1)]
- 6.) The owner or operator of an affected source shall maintain all records in accordance with the requirements of §63.10(b)(1). [§63.806(j)]

Reporting:

- 1.) The owner or operator of an affected source subject to Subpart JJ shall fulfill all reporting requirements of §63.7 through §63.10 of Subpart A (General Provisions) according to the applicability criteria in §63.800(d) of Subpart JJ. [§63.807(a)]
- 2.) The owner or operator of an affected source demonstrating compliance in accordance with §63.804(g)(1), (2), (3), and (7) shall submit a report covering the previous six months of wood furniture manufacturing operations: [§63.807(c)]
 - a) Reports shall be submitted 30 calendar days after the end of each six-month period following the first report. [§63.807(c)(2)]
 - b) The semi-annual reports shall include the information required by §63.804(g)(1), (2), (3), and (7), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance. [§63.807(c)(3)]
 - c) The frequency of the reports required by §63.807(c) shall not be reduced from semi-annually regardless of the history of the owner's or operator's compliance status. [§63.807(c)(4)]

Permit Condition PB-3

10 CSR 10-6.060

Construction Permits Required

Construction Permit #102001-008

Applicable to Emission Points: B-1, B-2, B-3, B-4, B-5, & B-6

Emission Limitation:

- 1.) W. W. Wood Products, Inc. shall not discharge into the atmosphere from the spray booths (B-1 through B-6) added under Construction Permit #102001-008, volatile organic compounds (VOC) in excess of 100.0 tons in any consecutive 12-month period. [Special Condition 1.A]
- 2.) W. W. Wood Products, Inc. shall not discharge into the atmosphere from the spray booths (B-1 through B-6) added under Construction Permit #102001-008, any individual or combination of hazardous air pollutants (HAP) in excess of 10.0/25.0 tons respectively in any 12-month period. [Special Condition 2.A]

Monitoring/ Record Keeping:

- 1.) W. W. Wood Products, Inc. shall maintain an accurate record of the emissions of VOC into the atmosphere from the spray booths (B-1 through B-6) added under Construction Permit #102001-008, and shall record the monthly and running 12-month totals of VOC emissions from these sources. W. W. Wood Products, Inc. shall use Attachment G, Monthly VOC Tracking Record, or an equivalent form for this purpose. W. W. Wood Products, Inc. shall maintain these records on-site

for not less than five (5) years and all such records required by permit #102001-008 shall be immediately made available to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 1.B]

- 2.) W. W. Wood Products, Inc. shall maintain an accurate record of all the individual and combined HAP emissions into the atmosphere from the spray booths (B-1 through B-6) added under Construction Permit #102001-008, and shall record the monthly and running 12-month totals of HAP emissions from these sources. W. W. Wood Products, Inc. shall use Attachment H, Monthly Combined HAPs Tracking Record and Attachment I, Monthly Individual HAPs Tracking Record, or equivalent forms for this purpose. W. W. Wood Products, Inc. shall maintain these records on-site for not less than five (5) years and all such records required by permit #102001-008 shall be immediately made available to any Missouri Department of natural Resources personnel upon request. [Special Condition 2.B]

Reporting:

- 1.) W. W. Wood Products, Inc. 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 the end of the month, if the 12-month cumulative total (Special Condition 1.B. of Construction Permit #102001-008) records show that the above sources exceed the limitation of Condition No. 1.A. of Construction Permit #102001-008 (no more than 100.0 tons of VOC emitted from the spray booths (B-1 through B-6) in any consecutive 12-month period). [Special Condition 1.C]
- 2.) W. W. Wood Products, Inc. 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 the end of the month, if the 12-month cumulative total (Special Condition 2.B. of Construction Permit #102001-008) records show that the above sources exceed the limitation of Condition No. 2.A. of Construction Permit #102001-008 (no more than 10.0/25.0 tons of individual/combined HAP emitted from the spray booths (B-1 through B-6) in any consecutive 12-month period). [Special Condition 2.C]

Permit Condition PB-4

10 CSR 10-6.060

**Construction Permits Required
Construction Permit #012006-010A**

Condition applicable to emission units: A-10, A-14, A-15, A-16, A-17, A-18, A-65, A-66, B-20, B-21, F-1, F-2, A-372, A-373, A-374, A-375, & B-7.

Emission Limitation:

- 1.) W. W. Wood Products, Incorporated shall emit less than 250 tons of Volatile Organic Compounds (VOCs) in the aggregate from the applicable equipment in any consecutive 12-month period. [Special Condition 2.A]
- 2.) The propane gas-fired RTO shall be operated and maintained in accordance with the manufacturer's specifications. Any destruction/removal efficiency and/or VOC emission rate used to show compliance with the annual 250 ton VOC limit shall be verified through compliance testing. [Special Condition 3.A]
- 3.) High efficiency filters in all paint booths (A-14, A-15, A-16, A-17, A-18, A-65, A-66, B-20, B-21, F-1, & F-2) and the dry filter/screens in the automatic flat-line, sealcoat/topcoat and finish drying systems (A-372, A-373, A-374, A-375) must be in use at all times when the spray guns associated

with the specific pieces of equipment are in operation and shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 5.A]

- 4.) W. W. Wood Products, Incorporated shall keep solvents and cleaning solutions in sealed containers whenever the materials are not in use. W. W. Wood Products, Incorporated shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment. [Special Condition 7]

Monitoring:

- 1.) The operating temperature of the RTO shall be monitored and recorded during operation and shall be maintained within 50 degrees of the temperature that is determined during the compliance test –W. W. Wood Products, Incorporated shall either install a continuous recorder or manually record the temperature at least once an hour during operation of the RTO. Multiple VOC destruction/removal efficiencies may be established during testing for a corresponding temperature range. Where temperature ranges overlap, the lowest control/destruction efficiency shall be used. The appropriate removal/destruction should be inserted into the Attachment A (or equivalent form). A removal/destruction efficiency of 0 percent will be used when the RTO is not operating or when the operating temperature is 50 degrees F below the lowest temperature at which tests were conducted. [Special Condition 3.B]
- 2.) Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the 250 ton per year VOC limit. [Special Condition 2.B]
- 3.) Attachment A1 or equivalent forms approved by the Air Pollution Control Program shall be used to record operating temperature if a continuous recorder is not installed. [Special Condition 3.C]

Record Keeping:

- 1.) W. W. Wood Products, Incorporated shall maintain an operating, maintenance and inspection log for the RTO which shall include the following: [Special Condition 3.D]
 - a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on missions due to the malfunction;
 - b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.; and
 - c) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection.
- 2.) W. W. Wood Products, Incorporated 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 in the applicable equipment. [Special Condition 2.B]

Reporting:

- 1.) W. W. Wood Products, Incorporated 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 indicate that the source exceeds the annual 250 ton VOC limitation.
- 2.) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION PB-5

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Condition applicable to Emission Units: A-10, A-14, A-15, A-16, A-17, A-18, A-65, A-66, B-20, B-21, F-1, F-2, A-372, A-373, A-374, A-375, & B-7.

Operational Requirements:

- 1.) These units are provided a conditional exemption from this rule per §6.400(1)(B)14.
- 2.) The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring and maintenance requirements for the associated control devices.

Monitoring:

- 1.) Booths equipped with mat/panel filters shall not be operated without a filter in place.
- 2.) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3.) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- 4.) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Record Keeping:

- 1.) The permittee shall maintain records of inspections of mat/panel filters when they occur.
 - a) All inspections, corrective actions, and instrument calibrations shall be recorded.
 - b) Attachment C contains a log including these record keeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 2.) All records shall be kept on-site for a minimum of five (5) years and made available to the Missouri Department of Natural Resources' personnel upon request.

Reporting:

- 1.) The permittee 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 permittee determined that the emission unit(s) exceeded the limitation listed above.
- 2.) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition PB-6

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1.) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
- 2.) Exception: A person 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 percent.

Monitoring, Recordkeeping and Reporting:

The monitoring, recordkeeping and reporting requirements for this condition are placed under the 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants heading in the Core Permit Requirements Section (Section IV) of this permit.

Permit Condition C7-1

10 CSR 10-6.075

Maximum Achievable Control Technologies Regulations

40 CFR Part 63 Subpart JJ

National Emission Standards for Wood Furniture Manufacturing Operations

40 CFR Part 63 Subpart A

General Provisions

Applicable to the Cabinet Door Production Division – Gluers (Emission Point EP-C7)

Emission Limitation:

- 1.) Each owner or operator of a new affected source subject to Subpart JJ shall limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using the compliance method in §63.804(e)(1). [\[§63.802\(b\)\(2\)\]](#)
 - a) The permittee shall comply with those provisions of §63.802(b)(2) by using the following method: [\[§63.804\(e\)\]](#)
 - 1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied. [\[§63.804\(e\)\(1\)\]](#)

Monitoring:

- 1.) Owners or operators of an affected source subject to the provisions of §63.802(b)(2) that comply through the procedures established in §63.804(e)(1), shall submit a compliance certification with the semi-annual report required by §63.807(c). [\[§63.804\(g\)\(5\)\]](#)
 - a) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semi-annual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard. [\[§63.804\(g\)\(5\)\(i\)\]](#)
 - b) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [\[§63.804\(g\)\(5\)\(ii\)\]](#)

Record Keeping:

- 1.) The owner or operator of an affected source subject to Subpart JJ shall fulfill all recordkeeping requirements of §63.10 of Subpart A, according to the applicability criteria in §63.800(d) of Subpart JJ. [\[§63.806\(a\)\]](#)
- 2.) The owner or operator of an affected source subject to the emission limits in §63.802 of Subpart JJ shall maintain records of the following: [\[§63.806\(b\)\]](#)
 - a) A certified product data sheet for each contact adhesive subject to the emission limits in §63.802; and [\[§63.806\(b\)\(1\)\]](#)
 - b) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each contact adhesive subject to the emission limits in §63.802. [\[§63.806\(b\)\(2\)\]](#)

- 3.) The owner or operator of an affected source subject to the emission limits in §63.802 and following the compliance provisions of §63.804(g)(5) shall maintain records of the compliance certifications submitted in accordance with §63.807(c) for each semi-annual period following the compliance date. [\[§63.806\(h\)\]](#)
 - a) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by §63.9(h) and §63.807(b) and the semi-annual reports required by §63.807(c). [\[§63.806\(h\)\(1\)\]](#)
- 4.) The owner or operator of an affected source shall maintain all records in accordance with the requirements of §63.10(b)(1). [\[§63.806\(j\)\]](#)

Reporting:

- 1.) The owner or operator of an affected source subject to Subpart JJ shall fulfill all reporting requirements of §63.7 through §63.10 of Subpart A (General Provisions) according to the applicability criteria in §63.800(d) of Subpart JJ. [\[§63.807\(a\)\]](#)
- 2.) The owner or operator of an affected source demonstrating compliance in accordance with §63.804(g)(5) shall submit a report covering the previous six months of wood furniture manufacturing operations: [\[§63.807\(c\)\]](#)
 - a) Reports shall be submitted 30 calendar days after the end of each six-month period following the first report. [\[§63.807\(c\)\(2\)\]](#)
 - b) The semi-annual reports shall include the information required by §63.804(g)(5), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance. [\[§63.807\(c\)\(3\)\]](#)
 - c) The frequency of the reports required by §63.807(c) shall not be reduced from semi-annually regardless of the history of the owner’s or operator’s compliance status. [\[§63.807\(c\)\(4\)\]](#)

General Equipment (GE) - Wood Grinder, Sawdust Fired Boiler, ACD			
Emission Unit #	General Description	EIQ Reference # (Year)	Applicable Conditions
F-9	Montgomery/ 60LRW Waste wood grinder; MHDR 2 ton/hr; installed 2001. Vented to Dust Collector (CD-F10)	F-9 (2009)	GE-1
D-4	Sawdust fired boiler to heat dry kiln; MHDR 0.3212 tons burned/hr (3.34 MMBtu/hr); equipped with fly ash re-injection system. (1993)	D-4 (2009)	GE-2, GE-3
A-64	Air Curtain Destructor; wood waste incineration; McPherson Systems, Inc./M115E MHDR 2 ton/hr; Installed 2000	(A-64) (2009)	GE-4, GE-5

Permit Condition GE-1
10 CSR 10-6.060 Construction Permits Required Construction Permit #102001-002
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes
<i>Condition applicable to Emission Unit F-9</i>

Operating Limitation:

- 1.) W. W. Wood Products shall not use the waste grinder machine to process waste from off site.
[Special Condition 1]
- 2.) The Operation Monitoring, and Maintenance requirements to comply with the conditional exemption provided by §6.400(1)(B)8, & §6.400(1)(B)15 are provided in PERMIT CONDITION FM-1 of this permit

Reporting:

The permittee shall report any deviations/exceedances of this permit condition or using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition GE-2

10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Condition applicable to Emission Unit D-4

Emission Limitation:

- 1.) The permittee shall not emit particulate matter in excess of 0.32 lb/hr from this emission unit.
- 2.) This emission rate was calculated using the equation found in 10 CSR 10-3.060(5)(B) for new indirect heating sources (post-1971) and using an aggregate heat input of 63.78 MMBtu/hr considering all indirect heating sources facility wide.

Operation Limitation:

The permittee shall operate and maintain the wood fired boiler with integrated flyash reinjection system according to the manufacturer's specifications and recommendations.

Monitoring:

- 1.) Inspect the structural components, including the ductwork and hoods for leaks and component failures quarterly.
- 2.) Maintain a written record of all observations, deficiencies and any action resulting from inspections.
- 3.) All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's instructions.

Record Keeping:

- 1.) All inspections, corrective actions, and instrument calibration shall be recorded. (see Attachment C)
- 2.) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 3.) All records shall be maintained for five (5) years.

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 (10) days after the permittee determined any exceedance of 10 CSR 10-3.060.

- 2.) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition GE-3

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Condition applicable to Emission Unit D-4

Emission Limitation:

- 1.) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
- 2.) Exception: A person 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 percent.

Monitoring, Recordkeeping and Reporting:

The monitoring, recordkeeping and reporting requirements for this condition are placed under the 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants heading in the Core Permit Requirements Section (Section IV) of this permit.

Permit Condition GE-4

10 CSR 10-6.070

New Source Performance Regulations

40 CFR Part 60 Subpart CCCC

Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced after November 30, 1999 or for Which Modification or Reconstruction is Commenced On or After June 1, 2001

40 CFR Part 60 Subpart A

General Provisions

Condition applicable to emission unit A-64

Emission Limitation:

- 1.) The permittee must meet the two limitations specified in §63.2550(a)(1) and (2). [\[§60.2250\]](#)
 - a) The opacity limitation is 10 percent (6-minute average), except as described in §63.2550 (a)(2). [\[§60.2250\(a\)\]](#)
 - b) The opacity limitation is 35 percent (6-minute average) during the startup period that is within the first 30 minutes of operation. [\[§60.2250\(b\)\]](#)
- 2.) Except during malfunctions, the requirements of this subpart apply at all times, and each malfunction must not exceed 3 hours. [\[§60.2250\(b\)\]](#)

Monitoring:

- 1.) The permittee must use Method 9 of appendix A of part 60 to determine compliance with the opacity limitation. [\[§60.2255\(a\)\]](#)
- 2.) The permittee must conduct an initial test for opacity as specified in §60.8. [\[§60.2255\(b\)\]](#)

- 3.) After the initial test for opacity, conduct annual tests no more than 12 calendar months following the date of your previous test. [§60.2255(c)]

Record Keeping:

- 1.) The permittee must keep records of results of all initial and annual opacity tests onsite in either paper copy or electronic format, unless the Director approves another format, for at least five years. (see Attachment E) [§60.2260(b)]
- 2.) The permittee must make all records available for submittal to the Director or for an inspector's onsite review. [§60.2260(c)]

Reporting:

- 1.) The permittee must submit annual opacity test results within 12 months following the previous report. [§60.2260(d)]
- 2.) The permittee must submit initial and annual opacity test reports as electronic or paper copy on or before the applicable submittal date. [§60.2260(e)]
- 3.) The permittee must keep a copy of the initial and annual reports onsite for a period of five (5) years. [§60.2260(f)]
- 4.) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition GE-5

10 CSR 10-6.060

Construction Permits Required

Construction Permit #012006-010A & 12006-010B

Condition applicable to emission unit A-64

Air Curtain Destructor (ACD) Operational Requirements:

- 1.) The ACD must operate in conformance with manufacturer recommendations and the Operating and Maintenance manual. A copy of the Operating and Maintenance manual has been provided to the Regional Office and the Air Pollution Control Program and a copy must be kept on site at all times and made available to Department personnel upon request; [Special Condition 6.A]
- 2.) The ACD at this location can not burn more than 24,000 pounds per day of untreated wood waste; [Special Condition 6.B]
- 3.) The company may only burn wood waste with no inks, coating, impregnation, pressure treatment or other treatment; [Special Condition 6.C]
- 4.) No burning shall take place within 200 yards of any occupied structure or business except structures owned by W. W. Wood Products, Incorporated; [Special Condition 6.D]
- 5.) All burning shall take place between 6:30 A.M. to 5:00 P.M Monday through Friday; [Special Condition 2 of Construction Permit #012006-010B]
- 6.) W. W. Wood Products, Incorporated must keep appropriate fire fighting equipment on hand at all times; [Special Condition 6.F]
- 7.) A representative of the facility must be present during all burning to ensure compliance with the terms and conditions of this Special Condition; [Special Condition 6.G]
- 8.) Only one startup is allowed during each 24-hour period; [Special Condition 6.H]

- 9.) In the event the facility and / or the Missouri Department of Natural Resources receive any complaint, all burning shall be suspended until the complaint has been resolved;
[Special Condition 6.I]

Monitoring & Record keeping:

- 1.) W. W. Wood Products, Incorporated shall maintain an operating, maintenance and inspection log for the ACD which shall include the following: [Special Condition 6.J]
- a) The date, start and end time for each burning operation including the total weight in pounds of all materials burned during each day of operation;
 - b) A narrative summary of any complaints received by the facility;
 - c) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on missions due to the malfunction; and
 - d) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.;
- 2.) All records shall be kept on-site for a minimum of five (5) years and made available to the Missouri Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) W. W. Wood Products, Incorporated may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if W. W. Wood Products, Incorporated fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation, which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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 may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full paper EIQ to the Air Pollution Control Program by no later than April 1st after the end of each reporting year. The permittee may instead submit a full electronic EIQ via MoEIS by no later than May 1st after the end of each reporting year.
- 5) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

Emission Limitation:

- 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. All tests shall be performed by qualified personnel.
- 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 10-3.090 Restriction of Emission of Odors

This requirement is not federally enforceable.

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.

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct and record opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22 (see Attachment E). The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.

- b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment D (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

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 record keeping 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.
- 5) 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(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(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-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, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - 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.A 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 semi-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(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(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)3 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 semi-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 EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(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(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously

emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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.
 - 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; and
 - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Ron Wunderlich, President. 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(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the 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 E

This record keeping sheet or an equivalent form may be used for the record keeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* and 40 CFR Part 60 Subpart CCCC, *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units*.

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

Attachment F
Table 3 of Subpart JJ - Summary of Emission Limits

40 CFR Part 63 Subpart JJ, *National Emission Standards for Wood Furniture Manufacturing Operations*

Emission point	Emission Limit
Finishing Operations:	
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied	^a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):	
—stains	^a 1.0
—washcoats	^{a,b} 0.8
—sealers	^a 0.8
—topcoats	^a 0.8
—basecoats	^{a,b} 0.8
—enamels	^{a,b} 0.8
—thinners (maximum % HAP allowable); or	10.0
(c) As an alternative, use control device; or	^c 0.8
(d) Use any combination of (a), (b), and (c)	0.8
Cleaning Operations:	
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8
Contact Adhesives:	
(e) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:	
(i) For aerosol adhesives, and for contact adhesives applied to nonporous substrates	^d NA
(ii) For foam adhesives used in products that meet flammability requirements	0.2
(iii) For all other contact adhesives (including foam adhesives used in products that do not meet flammability Requirements); or.....	0.2
(b) Use a control device	^e 0.2

- a. The limits refer to the VHAP content of the coating, as applied.
- b. Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent HAP by weight.
- c. The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.
- d. There is no limit on the VHAP content of these adhesives.
- e. The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

Attachment J
Compliance Demonstration

10 CSR 10-3.060, Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Allowable PM Emission Rate (E) - [§3.060(5)(B) - New Sources, installed after February 24, 1971]

$$E = 1.31(Q)^{-0.338}$$

Where:

Q = the installation heat input in millions of Btu per hour.

The following equipment was used to obtain the total heat input (Q) for the equation;

Equipment	Heat Input (MMBtu/hr)
Sawdust Fired Boiler	3.34
Space Heaters	60.44
Total (Q)	63.78

The facility wide PM Emission rate limit (E) = $1.31(63.78)^{-0.338} = 0.32$ lb/MMBtu (per unit)

Potential emission rate calculations:

PM Emission Factor = 0.40 lb/MMBtu (Table 1.6-1, AP-42)

PM capture efficiency = 100 %

PM control efficiency = 25 %

$$\text{Potential Emission Rate} = \left(\frac{0.40 \text{ lb}}{\text{MMBtu}} \right) \times \left(1 - \frac{\text{Control Efficiency}}{100} \right) = (0.40) \times (1 - 0.25) = 0.30 \frac{\text{lb}}{\text{MMBtu}}$$

And;

$$0.30 \text{ lb / MMBtu} < 0.32 \text{ lb / MMBtu}$$

The calculation verifies compliance provided that the control device is in operation and working properly.

STATEMENT OF BASIS

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) Part 70 Operating Permit Application, received December 1, 2004;
- 2) 2009 Emissions Inventory Questionnaire; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

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

Construction Permit History	
Permit Number	Description
012006-010A	2007-05-116: Amendment to CP 12006-010 to remove 99% DRE requirements. In lieu of requiring a specific destruction efficiency, testing of the RTO was required in order to establish a destruction efficiency based on the operating temperature of the RTO. <i>Provisions carried forward into this permit under Condition PB-4.</i>
012006-010	2005-11-048: Section (6) Permit. Construction of two (2) automatic flat-line, sealcoat/topcoat and finish drying systems, one (1) regenerative thermal oxidation control device, and nine (9) spray booths and permission for continued operation of the Air Curtain Destructor. <i>Provisions carried forward into this permit under Condition PB-4.</i>
062005-007	2005-02-104: Section (6) Permit. Addition of an automatic flat-line, sealcoat/topcoat application and finish drying system in the Shiloh Custom Cabinetry Division. <i>All provisions superceded by CP # 12006-010.</i>
012005-006	2004-10-015: Section (5) Permit. Addition of two spray booths in the Shiloh Custom Cabinetry Division. <i>All provisions superceded by CP # 062005-007.</i>
112004-007	2004-09-001: Section (5) Permit. Addition of one spray booth to Sequoia Division. <i>All provisions superceded by CP # 062005-007.</i>
092004-015	2004-07-070: A Section (6) permit issued for the addition of an automatic flat-line, sealcoat/topcoat application and finish drying system in the Shiloh Custom Cabinetry Division.

Construction Permit History	
Permit Number	Description
	<i>No Special Conditions contained in permit.</i>
102001-002	2001-07-021: A Section (5) permit issued for the addition of a new wood waste grinder. <i>Provisions carried forward into this permit under Condition F-9.</i>
102001-008	2001-05-009: A Section (5) permit issued for the addition of 6 new spray booths and 2 new propane space heaters. <i>Provisions carried forward into this permit under Condition PB-3.</i>
0499-009	1999-02-070: A Section (5) permit issued for 1 new De Vilbis lacquer spray booth. <i>No Special Conditions contained in permit.</i>
0898-015	1998-03-103: A Section (6) permit issued for the addition of 5 new paint booths. <i>No Special Conditions contained in permit.</i>
0698-019	1998-02-0228: A Section (5) permit issued to convert the existing House Door Shop into the Savannah Cabinetry operation. <i>No Special Conditions contained in permit.</i>
1093-012	4600-0019-006: A Section (6) permit issued to move an existing Kitchen Cabinet shop to a new building. <i>No Special Conditions contained in permit.</i>
0792-004	4600-0019-005: A Section (5) issued to add a wood waste fired boiler and storage system. <i>No Special Conditions contained in permit.</i>

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart CCCC, *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced after November 30, 1999 or for Which Modification or Reconstruction is Commenced On or After June 1, 2001*

Air Curtain Destructor (A-64), is subject to §60.2245-§60.2260 of this subpart. These requirements are included in Permit Condition GE-4.

40 CFR Part 60 Subpart Dc does not apply to Sawdust Fired Boiler (D-4) because the kiln's maximum hourly heat input is less than the applicability rate of 10 million Btu per hour.

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63 Subpart JJ - *National Emission Standards for Wood Furniture Manufacturing Operations*

This facility is subject to this rule and is subject to the standards for new sources(see *Permit Conditions PB-1, PB-2, and C7-1*) Wood furniture manufacturing facilities that begin construction or reconstruction after the proposal date, that after December 6, 1994 are considered new sources.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulatory Determinations

10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

For the natural gas fired space heaters:

$$\text{Natural gas PM emission factor (lbs/MMBtu)} = \frac{7.6 \text{ lbs}/10^6 \text{ scf}}{1020 \text{ MMBtu}/10^6 \text{ scf}} = 7.45 \times 10^{-3} \text{ lb/MMBtu}$$

(AP - 42 Table 1.4 - 2(7/98))

The applicable emission limit of §3.060(5)(B) of new source is 0.32 lb/MMBtu, and as demonstrated above, the expected emission rate from the natural gas fired units are several orders of magnitude lower than the limit. Therefore, no unit specific requirements were included in this permit for this rule.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Emissions*

The Air Curtain Destructor (A-64), is exempt from this rule according to 10 CSR 10-6.220 (1)(I). As demonstrated below under the §6.400 heading, the anticipated PM emission rate from the Montgomery Scrap Wood Grinder (F-9) is not expected to approach or exceed the opacity standard set forth in this rule. Therefore no provisions from this rule were included in this permit for this unit.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*, applies to this installation. AP-42 Table 1.6-2 (09/03) provides a SO₂ emission factor of 0.025 lb/MMBtu. The standard for SO₂ from indirect heating sources from §6.260(3)(C)(2)(A) is 8 lb/MMBtu. It can be further demonstrated that the SO₂ emissions resulting from the combustion of wood/wood residue do not exceed the new source standard of 500 ppm found in 6.260(3)(A)(2);

$$\text{ppmv SO}_2 = \left(\frac{0.025 \text{ lb}}{\text{MMBtu}} \right) \times \left(\frac{\text{MMBtu}}{10,320 \text{ wscf}} \right) \times \left(\frac{\text{ppmw}}{1.667 \text{E}^{-7} \text{ lb/scf}} \right) \times \left(\frac{0.45 \text{ ppmv}}{\text{ppmw}} \right) = 6.54 \text{ ppmv}$$

(Appendix A – 7 to Part 60)

There is no emission factor for sulfur trioxide (SO₃) in AP-42, but based upon the expected emission rate of SO₂, it can be reasonably surmised that the emission rate of SO₃ would be minimal. Based on this, it is highly unlikely that the boilers will exceed the emission limitations of the rule. Therefore, no provision for this rule was placed in this permit for the Sawdust Fired Boiler (D-4).

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

This rule provides conditional exemptions that will be met by the operation, monitoring, and maintenance procedures of the associated control devices as required in Permit Conditions FM-1, FM-3, PB-5 of this permit.

- 1) **§6.400(1)(B)14. Coating operations** equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers' specifications or comparable maintenance procedures that meet or exceed manufacturers' specifications;
- 2) **§6.400(1)(B)15 - Any particulate matter emission unit** that is subject to a federally enforceable requirement to install, operate, and maintain a particulate matter control device system that controls at least ninety percent (90%) of particulate matter emissions;

The processes reported under Emission points: D-1, D-2, D-3, F-3, & F-4, are exempted from this rule per §6.400(1)(B)8 - *Emission sources that are exempt from construction permitting under 10 CSR 10-6.061*;

§6.061(3)(A)2.DD. - Carving, cutting, routing, turning, drilling, machining, sawing, sanding, planing, buffing, or polishing solid materials, other than materials containing any asbestos, beryllium or lead greater than one percent (1%) by weight as determined by Material Safety Data Sheets (MSDS), vendor material specifications and/or purchase order specifications, where equipment—

- (I) Directs a stream of liquid at the point where material is processed;
- (II) Is used only for maintenance or support activity not conducted as part of the installation's primary business activity;
- (III) Is exhausted inside a building; or
- (IV) Is ventilated externally to an operating cyclonic inertial separator (cyclone), baghouse, or dry media filter. Other particulate control devices such as electrostatic precipitators or scrubbers are subject to construction permitting or a permit-by-rule, unless otherwise exempted.

The Sawdust Fired Boiler (D-4), is exempt from this rule because the burning of fuel for indirect heating is exempt according to 10 CSR 10-6.400(1)(B)6.

Montgomery Scrap Wood Grinder (F-9):

$$\text{PM PTE} = \left(\frac{0.35 \text{ lb}}{\text{ton}} \right) \times \left(\frac{2 \text{ ton}}{\text{hour}} \right) \left(1 - \frac{90}{100} \right) = 0.07 \frac{\text{lb}}{\text{hr}} \text{ or } 0.31 \frac{\text{ton}}{\text{yr}} @ 8760 \frac{\text{hrs}}{\text{yr}}$$

The PTE on an hourly basis is expected to be insignificant and exempt from this rule per §6.400(1)(B)12.

Wood hog (EP-D05);

$$\text{PM PTE} = \left(\frac{0.35 \text{ lb}}{\text{ton}} \right) \times \left(\frac{1.2 \text{ ton}}{\text{hr}} \right) = 0.42 \frac{\text{lb}}{\text{hr}} \ll 0.5 \frac{\text{lb}}{\text{hr}}$$

The PTE on an hourly basis is expected to be insignificant and exempt from this rule per §6.400(1)(B)12.

[3-07-008-02] PM Emission Factor from US EPA document FIRE 6.23 (0.35 lb/ton)

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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Don Murphy
Environmental Engineer

CERTIFIED MAIL: 70082810000020167442
RETURN RECEIPT REQUESTED

Mr. David Dutton
W.W. Wood Products, Inc.
P.O. Box 50
Dudley, MO 63936-0050

Re: Installation Name, 207-0019
Permit Number: **OP2011-023**

Dear Mr. Dutton:

Enclosed with this letter is your Part 70 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 that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC 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 AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Don Murphy at the Department's 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

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

MJS:dmk

Enclosures

c: Southeast Regional Office
PAMS File: 2004-12-001