



Matt Blunt, Governor • Doyle Childers, Director

# DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

JAN - 9 2006

Mr. Chuck Reinhardt  
General Manager  
Gregory Container, Inc.  
1385 Industrial Drive  
Kahoka, MO 63445

RE: New Source Review Permit, Permit by Rule  
Project Number: 2005-02-100, Facility ID Number: 045-0027

Dear Mr. Reinhardt:

On February 25, 2005, you submitted a "Permit by Rule" application for a paint booth. The original intention of the Permit by Rule was to allow a source to construct and operate the applicable source as soon as you submitted the application to our office. The Permit by Rule language states that the permit shall be approved after an initial on-site compliance inspection. However, in order to streamline the permitting process and satisfy requirements of the Environmental Protection Agency, the department has modified the procedures on these types of permits. The department now intends to review and approve permit by rule applications within seven days of submittal. The department will verify the permit during an on-site compliance inspection at a later date.

However, this does not affect your application or permit. Your Permit by Rule notification is valid as of the submittal day, February 25, 2005. Enclosed with this letter are a permit certificate and a copy of your application. The reverse side of the permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri. The application contains the special conditions applicable to your source. Operation in accordance with these conditions is necessary for continued compliance. Please keep the permit form and application in your files.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kyra L. Moore  
Permits Section Chief

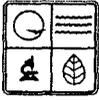
KLM: jbl

Enclosures

c: Northeast Regional Office  
PAMS File: 2005-02-100

Permit Number: 012006-002





Missouri Department of Natural Resources  
Missouri Air Conservation Commission  
Air Pollution Control Program

# PERMIT TO CONSTRUCT

PERMIT BY RULE

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

Construction Permit Number: 012006 - 002  
Project Number: 2005-02-100  
Installation ID: 045-0027

**Installation Name and Address**

Gregory Container, Inc.  
1385 Industrial Drive  
Kahoka, MO 63445  
Clark County

**Parent Company's Name and Address**

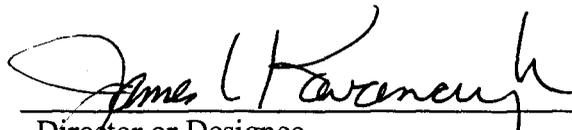
N/A

**Installation Description:**

Refuse containers, sheet steel, bar stock and tubing. Fabricate and paint refuse containers.

JAN - 9 2006

Effective Date

  
Director or Designee  
Department of Natural Resources

## STANDARD CONDITIONS:

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

**You will be in violation of 10 CSR 10-6.060 and 10 CSR 10-6.062 if you fail to adhere to the specifications and conditions listed in your permit by rule application and this permit.** Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department of Natural Resources Regional office responsible for the area within which the equipment is located within 15 days after the actual start up of this air contaminant source or as soon as you receive your permit.

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

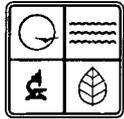
You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, Missouri 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date 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 choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

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

RECEIVED

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
 AIR POLLUTION CONTROL PROGRAM  
 P.O. BOX 176, JEFFERSON CITY, MO 65102-0176  
**APPLICATION FOR AUTHORITY TO CONSTRUCT**  
**PERMIT BY RULE NOTIFICATION**  
**SURFACE COATING OPERATIONS**



APCP USE ONLY	
CHECK NO. 27 1018	CHECK RECEIVED (MM/DD/YY) 2/25/05
CHECK AMOUNT \$ 700.00 / \$100.00 - 600.	CHECK DATE (MM/DD/YY) 2/31/05
PROJECT NO. 2005-02-100	PERMIT NO.

**SECTION A: GENERAL NOTIFICATION INFORMATION - ALL NOTIFICATIONS MUST BE ACCOMPANIED BY A \$700 FEE.**

**SECTION A-1: GENERAL INSTALLATION INFORMATION**

1. INSTALLATION NAME <b>GREGORY CONTAINER INC</b>		2. FIPS <b>045</b>	3. PLANT NO.
4. INSTALLATION STREET ADDRESS <b>1385 INDUSTRIAL DR.</b>			
5. INSTALLATION MAILING ADDRESS <b>SAME</b>			
6. CITY <b>KAHOKA</b>		STATE <b>MO</b>	ZIP CODE <b>63445</b>
7. COUNTY NAME <b>CLARK</b>	8. 1/4, of <b>SE</b> 1/4, of <b>NE</b> SECTION <b>19</b> TOWNSHIP <b>T65N</b> RANGE <b>R7W</b>		
9. PARENT COMPANY <b>N/A</b>			
10. PARENT COMPANY MAILING ADDRESS			
11. CITY		STATE	ZIP CODE
12. INSTALLATION CONTACT PERSON <b>CHUCK REINHARDT</b>		13. CONTACT PERSON'S TITLE <b>GENERAL MANAGER</b>	
14. CONTACT PERSON'S MAILING ADDRESS <b>2512 HENRY LADYN DR.</b>			
15. INSTALLATION CONTACT TELEPHONE NO. <b>(319) 463-7700</b>		16. INSTALLATION CONTACT FAX NO. <b>(319) 463-7643</b>	
17. INSTALLATION CONTACT E-MAIL ADDRESS <b>chuckr@gregorydm.com</b>			
18. PROJECTED DATE TO COMMENCE CONSTRUCTION <b>July 14, 2004</b>		19. PROJECT DATE OF OPERATION STARTUP <b>MAY 1, 2005</b>	

**SECTION A-2: INSTALLATION DESCRIPTION**

20. **Refuse Containers  
 Sheet Steel, Bar Stock, and tubing  
 Fabricate and paint Refuse Containers**

**SECTION A-3: CERTIFICATION STATEMENT**

I certify that I have personally examined and am familiar with the information in this application and believe that the information submitted is accurate and complete. I am aware that making a false statement or misrepresentation in this application is grounds for denying or revoking this permit.

21. SIGNATURE OF RESPONSIBLE OFFICIAL <i>Chuck Reinhardt</i>		22. DATE <b>2-21-05</b>
23. TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL <b>Chuck Reinhardt</b>		24. RESPONSIBLE OFFICIAL'S TELEPHONE NUMBER <b>(319) 463-7700</b>
25. TITLE OF RESPONSIBLE OFFICIAL <b>General Manager</b>		

surface coating

**SECTION B: SPECIAL CONDITIONS FOR PRINTING OPERATIONS**

Construction and operation of this new air pollution source is subject to the special conditions listed below. These special conditions are based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically RSMo. 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.062 "Construction Permits by Rule").

Please indicate by marking the appropriate box as to whether or not the emission source complies with the rule listed in the applicable emission limit or standard. If any of the applicable emission source boxes are checked no, your source is not eligible for a printing operation permit by rule.

This Permit By Rule applies only to Surface Coating Operations constructed after October 31, 2003.

SPECIAL CONDITION	EMISSION SOURCE COMPLY?	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-6.062(3)(B)3.A.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Metalizing, spraying molten metal onto a surface to form a coating, is not permitted under this permit-by-rule. The use of coatings that contain metallic pigments is permitted.	Proper work practice.
10 CSR 10-6.062(3)(B)3.B.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>All facilities shall implement good housekeeping procedures to minimize fugitive emissions, including:</p> <p>All spills shall be cleaned up immediately.</p> <p>The booth or work area exhaust fans shall be operating when cleaning spray guns and other equipment.</p> <p>All new and used coatings and solvents shall be stored in closed containers. All waste coatings and solvents shall be removed from the site by an authorized disposal service or disposed of at a permitted on-site waste management facility.</p>	To ensure proper work practices the operator shall provide and maintain suitable, easily read, permanent markings on all coatings and solvents containers.
10 CSR 10-6.062(3)(B)3.C.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Drying and curing ovens shall either be electric or meet the following conditions:</p> <p>The maximum heat input to any oven must not exceed forty (40) million British thermal units (Btus) per hour.</p> <p>Heat shall be provided by the combustion of one of the following: natural gas, liquid petroleum gas, fuel gas containing no more than twenty (20) grains of total sulfur compounds (calculated as sulfur) per one hundred (100) dry standard cubic feet, or number 2 fuel oil with not more than three tenths percent (0.3%) sulfur by weight.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.D.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Emissions shall be calculated using a material balance that assumes that all VOC's and hazardous air pollutants in the paints and solvents used are directly emitted to the atmosphere. The total uncontrolled emissions from the coating materials (as applied) and cleanup solvents shall not exceed the following for all operations:</p> <p>Forty (40) tons per twelve (12)-month period, rolled monthly, of VOC's for all surface coating operations on the property.</p>	Determined through proper record keeping. Worksheets A, B, and C (or equivalent) shall be used to demonstrate compliance with this condition. These records shall be maintained for not less than five (5) years, and they shall be immediately available to any Missouri Department of Natural Resources personnel upon request. The operator shall report to the Air Pollution Control.
		<p>A sum of twenty-five (25) tons per twelve (12)-month period, rolled monthly, of all hazardous air pollutants for all surface coating operations on the property.</p> <p>Each individual hazardous air pollutant shall not exceed the emission threshold levels established in 10 CSR 10-6.060(12)(J), rolled monthly.</p>	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 these conditions are exceeded.

**SECTION B: SPECIAL CONDITIONS FOR PRINTING OPERATIONS (CONTINUED)**

SPECIAL CONDITION	EMISSION SOURCE COMPLY?	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-6.062(3)(B)3.E.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>The surface coating operations shall be performed indoors, in a booth or in an enclosed work area. The booth shall be designed to meet a minimum face velocity at the intake opening of each booth or work area of one hundred feet (100') per minute. Emissions shall be exhausted through elevated stacks that extend at least one and one-half (1½) times the building height above ground level. All stacks shall discharge vertically. There shall be no obstructions, such as rain caps, unless such services are designed to automatically open when booths are operated.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.F.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>For spraying operations, emissions of particulate matter must be controlled using either a water wash system or a dry filter system with a ninety-five percent (95%) removal efficiency as documented by the manufacturer. The face velocity at the filter shall not exceed two hundred fifty feet (250') per minute or that specified by the filter manufacturer, whichever is less. Filters shall be replaced according to the manufacturer's schedule or whenever the pressure drop across the filter no longer meets the manufacturer's recommendation.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.G.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Coating operations shall be conducted at least fifty feet (50') from the property line and at least two hundred fifty feet (250') from any recreational area, residence, or other structure not occupied or used solely by the owner of the property upon which the facility is located.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.H.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>The facility shall not be located in an ozone nonattainment area.</p>	Proper work practice.
10 CSR 10-6.062(3)(B)3.I.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Record keeping. The operator shall maintain the following records and reports:</p> <p>All material safety data sheets for all coating materials and solvents.</p> <p>A monthly report indicating the days the surface coating operation was in operation and the total tons emitted during the month, and the calculation showing compliance with the rolling average emission limits of subparagraphs 10 CSR 10-6.062(3)(B)3.d.</p> <p>A set of example calculations showing the method of data reduction including units, conversion factors, assumptions, and the basis of assumptions.</p> <p>These reports and records shall be immediately available for inspection at the installation.</p>	<p>Determined through proper record keeping. Worksheets A, B, and C (or equivalent) shall be used to demonstrate compliance with this condition. These records shall be maintained for not less than five (5) years, and they shall be immediately available to any Missouri Department of Natural Resources personnel upon request. The operator shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (1) days after the end of the month during which these conditions are exceeded.</p>

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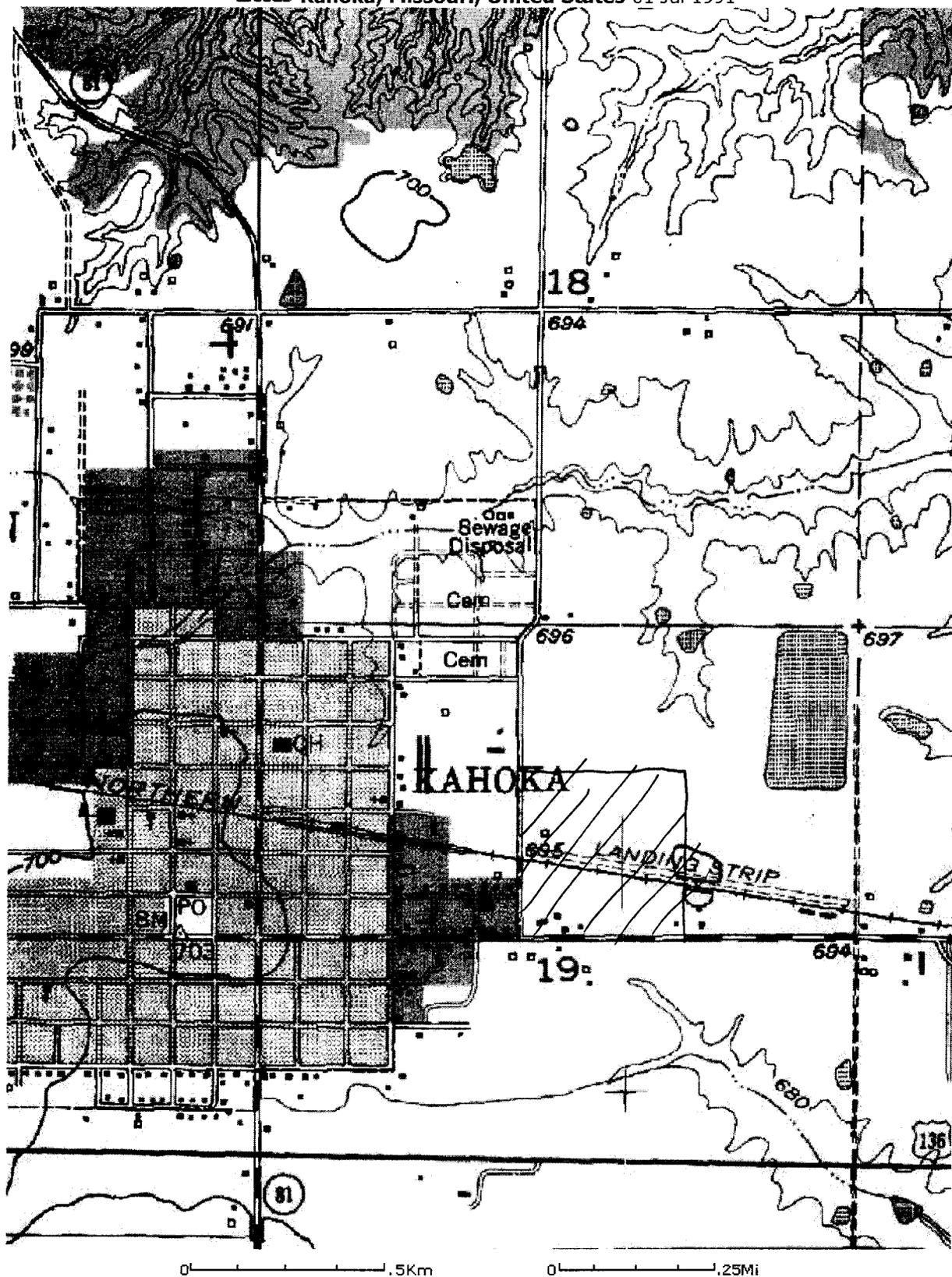


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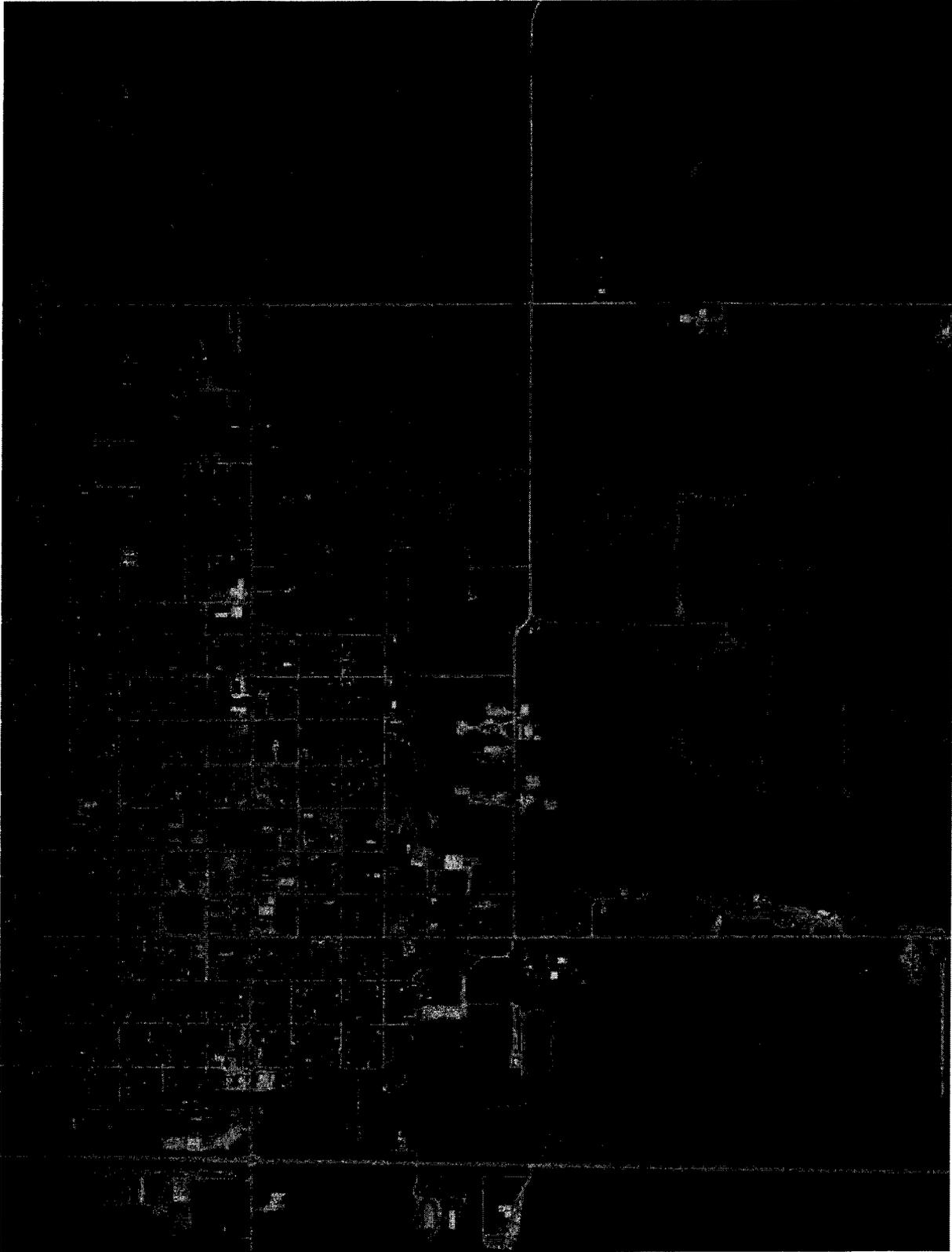
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