



INTERMEDIATE STATE 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 here in.

Intermediate Operating Permit Number: OP2007-011
Expiration Date: APR 10 2012
Installation ID: 071-0173
Project Number: 2002-01-134

Installation Name and Address

GDx Automotive
101 Danny Scott Drive
New Haven, MO 63068
Franklin County

Parent Company's Name and Address

GDx North America
P.O. Box 9067
Farmington Hills, MI 48333-9067

Installation Description:

GDx Automotive - Danny Scott Drive manufacturers automotive sealing products. The installation is an existing major source of Hazardous Air Pollutants (HAP) and a synthetic minor source of Volatile Organic Compounds (VOC). Process operations include rubber and PVC extrusion, curing ovens, adhesive application, surface coating, and presses.

APR 11 2007

Effective Date

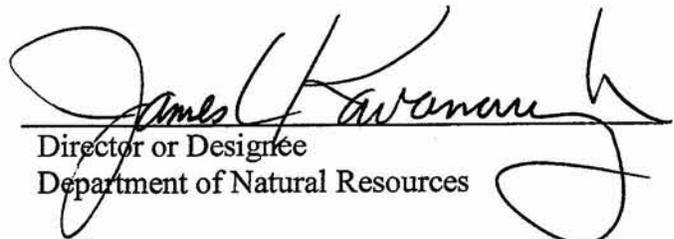

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS.....	4
DOCUMENTS INCORPORATED BY REFERENCE.....	5
II. PLANT WIDE EMISSION LIMITATIONS.....	6
PERMIT CONDITION PW001	6
10 CSR 10-6.060 Construction Permits Required.....	6
Construction Permit 052004-007A, Issued May 4, 2004	6
Permit Condition PW002	6
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	6
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	8
EU0010 through EU0300	8
Permit Condition (EU0010 through EU0300)-001	9
10 CSR 10-5.330	9
Permit Condition (EU0010 through EU0110)-002	11
10 CSR 10-6.400	11
IV. CORE PERMIT REQUIREMENTS	13
V. GENERAL PERMIT REQUIREMENTS.....	20
VI. ATTACHMENTS	24
Attachment A.....	25
Attachment B.....	26
Attachment C.....	27
Attachment D.....	28

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

GDx Automotive - Danny Scott Drive manufacturers automotive sealing products. The installation is a synthetic minor source of Hazardous Air Pollutants (HAP) and a synthetic minor source of Volatile Organic Compounds (VOC). Process operations include rubber and PVC extrusion, curing ovens, adhesive application, surface coating and presses.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs) ¹
2001	0.04	--	0.59	19.3	0.50	--	0.22
2002	0.07	0.01	0.92	37.8	0.78	--	1.06
2003	0.08	0.01	1.08	49.5	0.91	--	0.05
2004	0.12	0.01	1.59	28.2	1.33	--	0.04
2005	0.16	0.01	2.73	25.28	1.79	--	0.09

¹Some HAPs are reported as VOCs in the EIQ

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Line 3 Coating Booth (SE3-CB)
EU0020	Line 4 Coating Booth #1 (E4-CB1)
EU0030	Line 4 Coating Booth #2 (E4-CB2)
EU0040	Line 5 Coating Booth (E5-CB)
EU0050	Line 6 Coating Booth (SE6-CB)
EU0060	Line 7 Coating Booth (SE7-CB)
EU0070	Line 8 Primer and Coating Spray Booth (E8-CB)
EU0080	Coating Booth 3 (CB3)
EU0085	Coating Booth 4 (CB4)
EU0090	Coating Booth 6 (CB6)
EU0095	Coating Booth 7 (CB7)
EU0100	Molding Coating Booth #1 (MCB)
EU0110	Molding Coating Booth #2 (MCB)
EU0120	Line 1 Adhesive & Flock Application (E1-FB)
EU0130	Line 1 Microwave Oven
EU0140	Line 1 Coating Curing Oven (E1-02)
EU0150	Line 2 Adhesive & Flock Application (E2-FB)
EU0160	Line 2 Coating Curing Oven (E2-02)
EU0170	Line 3 IR Oven

EU0180	Line 4 Adhesive & Flock Application (E4-FB)
EU0190	Line 4 Coating Curing Oven (E4-02)
EU0200	Line 5 Adhesive & Flock Application (E5-FB)
EU0210	Line 5 Microwave Oven
EU0220	Line5 Coating Curing Oven (E5-02)
EU0230	Line 6 IR Oven
EU0240	Line 7 IR Oven
EU0250	Line 8 Curing Oven (E8-01)
EU0260	Line 8 Adhesive and Flock Application (E8-FB)
EU0270	Corner Flocker #1 (CF)
EU0280	Corner Flocker #2 (CF)
EU0290	Polyurethane Bonding Process
EU0300	DCX Coating Booth (EP-CB9)

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Line 1 Rubber Extrusion (E1-X)
Line 1 Rubber Curing Oven (E1-01)
Line 1 Wash Tanks (2)
Line 2 Rubber Extrusion (E2-X)
Line 2 Rubber Curing Oven (E2-01)
Line 2 Wash Tank
Line 3 Rubber Extrusion (SE3-X)
Line 3 Salt Curing (SE3-01)
Line 3 Wash Tanks (2)
Line 4 Rubber Extrusion (E4-X)
Line 4 Rubber Curing Oven (E4-01)
Line 4 Wash Tanks (2)
Line 5 Rubber Extrusion (E5-X)
Line 5 Rubber Curing Oven (E5-01)
Line 5 Wash Tanks (2)
Line 6 Rubber Extrusion (SE6-X)
Line 6 Salt Curing (SE6-01)
Line 6 Wash Tanks (2)
Line 7 Rubber Extrusion (SE7-X)
Line 7 Salt Curing (SE7-01)
Line 7 Wash Tanks (2)
Line 8 PVC Extrusion (E8-X)
Line 8 Wash Tanks (2)
Presses
3.5 Inch Extruder
Glass Preparation System
Space Heaters
Clean up Operations (CLN)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Missouri Department of Natural Resources Construction Permit #052004-007A

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.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required Construction Permit 052004-007A, Issued May 4, 2004

Emission Limitation:

- 1) GDX Automotive - Danny Scott Drive shall emit less than one hundred (100) tons of Volatile Organic Compounds (VOC) from the entire installation in any consecutive 12-month period. [[Special Condition 2.A](#)]
- 2) If a continuing situation of demonstrated nuisance odor exists in violation of 10 CSR 10-5.160, *Control of Odors in the Ambient Air*, the Director may require the permittee to submit a corrective action plan within 30 days, adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of construction permit #052004-007A. [[Special Condition 3.A](#)]

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of VOCs emitted into the atmosphere from the entire installation. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. The permittee shall maintain all records required by construction permit #052004-007A 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. [[Special Condition 2.B](#)]

Reporting:

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 end of the month during which the records from Special Condition Number 2(B) indicate that the source exceeds the limitation of Special Condition Number 2(A). [[Special Condition 2.C](#)]

Permit Condition PW002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

- 1) The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) in any consecutive 12-month period.
- 2) The permittee shall emit less than 25 tons of combined HAPs in any consecutive 12-month period.

Monitoring:

- 1) The permittee shall monitor the monthly amount and type of HAP containing materials used at the installation.

Recordkeeping:

- 1) For the first eleven (11) months from issue date of this permit, the permittee is not required to keep a 12-month rolling sum of individual HAPs or combined HAPs. However, a monthly total for each is required to be recorded.

- 2) Twelve months after the issue date of this permit, the permittee shall record the monthly total of individual and combined HAP emissions from this installation and the sum of the most recent consecutive 12-month totals in tons. (See Attachments C and D)
- 3) These records shall be made immediately available for inspection to the Missouri Department of Natural Resources personnel upon request.
- 4) These records shall be kept on-site for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program 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(s) listed above.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

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.

EU0010 through EU0300			
Emission Unit #	Emission Unit Name	General Description	EIQ Reference # (2004)
EU0010	Line 3 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	SE3-CB
EU0020	Line 4 Coating Booth #1	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2002	E4-CB1
EU0030	Line 4 Coating Booth #2	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	E4-CB2
EU0040	Line 5 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	E5-CB
EU0050	Line 6 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	SE6-CB
EU0060	Line 7 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	SE7-CB
EU0070	Line 8 Primer & Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter, permitted 2004	E8-CB
EU0080	Coating Booth 3	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB3
EU0085	Coating Booth 4	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB4
EU0090	Coating Booth 6	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB6
EU0095	Coating Booth 7	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB7
EU0100	Molding Coating Booth #1	MHDR 4.80 gal/hr; PM control device - panel filter; permitted 2000	MCB
EU0110	Molding Coating Booth #2	MHDR 2.70 gal/hr; PM control device - panel filter; permitted 2000	MCB
EU0120	Line 1 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber parts; equipped with baghouse that is vented inside; permitted 2000	E1-FB
EU0130	Line 1 Microwave Oven	Microwave Curing Oven	NA
EU0140	Line 1 Coating Curing Oven	Hot air curing; 3.0 MMBtu/hr; natural gas fired; permitted 2000	E1-02
EU0150	Line 2 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber; permitted 2002	E2-FB
EU0160	Line 2 Coating Curing Oven	Hot air curing oven; 2.5 MMBtu/hr; natural gas fired; permitted 2002	E2-02
EU0170	Line 3 IR Oven	Infrared Curing Oven	NA

EU0010 through EU0300			
Emission Unit #	Emission Unit Name	General Description	EIQ Reference # (2004)
EU0180	Line 4 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber; permitted 2002	E4-FB
EU0190	Line 4 Coating Curing Oven	Hot air curing oven; 2.5 MMBtu/hr; natural gas fired; permitted 2001	E4-02
EU0200	Line 5 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber parts; baghouse vented inside; permitted 1999	E5-FB
EU0210	Line 5 Microwave Oven	Microwave Curing Oven	NA
EU0220	Line 5 Coating Curing Oven	Hot air curing; MHDR 2.5 MMBtu/hr; natural gas fired; permitted in 1999	E5-02
EU0230	Line 6 IR Oven	Infrared Curing Oven	NA
EU0240	Line 7 IR Oven	Infrared Curing Oven	NA
EU0250	Line 8 Curing Oven	Hot air curing; MHDR 2.5 MMBtu; natural gas fired; permitted 2004	E8-01
EU0260	Line 8 Adhesive & Flock Application	Drip and wipe application of adhesive; permitted 2004	E8-FB
EU0270	Corner Flocker #1	Manual application of adhesive to rubber with an artist brush; permitted 2000	NA
EU0280	Corner Flocker #2	Manual application of adhesive to rubber with an artist brush; permitted 2000	NA
EU0290	Polyurethane Bonding Process	System which bonds both an isocyanate component and a polyol component to glass prior to bonding PVC to the glass; permitted 2004	PVC-Bond
EU0300	DCX Coating Booth	Spritz-on coating operation; MHDR 0.0600 gal/hr; permitted 2004	CB9

Permit Condition (EU0010 through EU0300)-001

10 CSR 10-5.330
Control of Emissions from Industrial Surface Coating Operations

Emission Limit:

The permittee shall not emit or discharge into the atmosphere volatile organic compounds (VOCs) in excess of 3.5 lb VOC/gallon of coating (less water and non-VOC organic compounds).

Monitoring:

- 1) The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
- 2) The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG_{VW}) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):

- a) Calculate the $DAVG_{vw}$ of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

- 3) If the daily volume-weighted average ($DAVG_{vw}$) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

Recordkeeping:

- 1) The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include:
- a) Daily records of the type and the quantity of coatings used daily;
 - b) The coatings manufacturer's formulation data for each coating in forms provide or approved by the director;
 - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
 - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
 - f) Daily records of the quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
- 2) All records shall be maintained for a minimum of five (5) years.
- 3) These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program 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) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

Permit Condition (EU0010 through EU0110)-002

10 CSR 10-6.400
Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0010 through EU0110 in excess of the emission rates listed in the following table:

Emission Unit	Allowable Emission Rate (lb/hr)
EU0010	0.11
EU0020	0.11
EU0030	0.10
EU0040	0.11
EU0050	0.11
EU0060	0.11
EU0070	0.11
EU0080	0.17
EU0085	0.14
EU0090	0.14
EU0095	0.17
EU0100	0.32
EU0110	0.22

- 2) These emission rates were calculated using the following equation:
- a) For process weight rates of 60,000 lb/hr or less:
 $E = 4.10(P)^{0.67}$
Where:
E = rate of emission in lb/hr
P = process weight rate in tons/hr
- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases.

Monitoring:

- Booths equipped with mat/panel filters (EU0010 through EU0110) shall not be operated without a filter in place.
- The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

- The permittee shall maintain records of inspections of mat/panel filters when they occur.
 - All inspections, corrective actions, and instrument calibrations shall be recorded.
 - Attachment B contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 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 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(s) listed above.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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.

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(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(6)(C)3.B]

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 shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

- 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. Qualified personnel shall perform all tests.
- 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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, or to fires used for recreational purpose, or to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-5.070 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices,

- the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
- b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt GDX Automotive from the provisions of any other law, ordinance or regulation.
 - 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

St. Louis City Ordinance 65645, Sec 15 Open Burning Restrictions

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

10 CSR 10-5.130 Certain Coals to be Washed

The permittee shall not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption in the St. Louis metropolitan area or use or consume in the said area any coal which as mined containing in excess of 2.0% sulfur or 12.0% ash calculated as described in 10 CSR 10-5.110, unless it has been cleaned by a process known as "washing" so that it shall contain no more than 12.0% ash on a dry basis. The term "washing" is meant to include purifying, cleaning, or removing impurities from coal by mechanical process, regardless of cleaning medium used.

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed. **This requirement is not federally enforceable.**

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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 10-6.250 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 recordkeeping 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.

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
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- 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, §(5)(C)1 and §(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, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - 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, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than 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, recordkeeping, reporting, or any other requirements of the permit.
 - 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 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 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 §(5)(C)1 and §(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(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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 semiannually (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 the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. 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; and
 - 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.

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

The application utilized in the preparation of this permit was signed by David J. Maggs, Plant Manager. The Air Pollution Control Program has been informed that Mr. Maggs is no longer the responsible official and Mr. Jim Eichelberger, Plant Manager is now the responsible official. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) 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,
- 2) 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,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

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

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

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) Intermediate Operating Permit Application, received 1/30/2002; revised 12/3/2002;
- 2) 2005 Emissions Inventory Questionnaire, received March 21, 2006; 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.

10 CSR 10-5.040, *Use of Fuel in Hand-Fired Equipment Prohibited*

This regulation was included as a core permit requirement for all installations in the St. Louis Metropolitan area.

10 CSR 10-5.240, *Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area*

This regulation was included as a core permit requirement for all installations in the St. Louis Metropolitan area.

10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*

While GDX Automotive is not subject to 40 CFR, Part 63, Subpart PPPP, *Surface Coating of Plastic Parts and Products* which defines a plastic part or product as "any piece or combination of pieces of which at least one has been formed from one or more resins, the definition of the subpart is used in this case. Such pieces may be solid, porous, flexible or rigid." Since rubber is formed from a resin, it meets the Subpart PPPP definition of a plastic. 10 CSR 10-5.330 regulates the surface coating of plastic parts but does not define plastic part. Therefore the subpart PPPP definition is used which makes 10-5.330 applicable to the installation.

10 CSR 10-6.100, *Alternate Emission Limits*

This regulation was included as a core permit requirement for all installations in Missouri.

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

This regulation was included as a core permit requirement for all installations in Missouri.

10 CSR 10-6.280, *Compliance Monitoring Usage*

This regulation was included as a core permit requirement for all installations in Missouri.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions from Existing Major Sources*

The installation is a synthetic minor source of VOC and therefore is not subject to this regulation.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule was marked as applicable in the permit application. However, combustion units that use exclusively pipeline grade natural gas, as defined in 40 CFR 72.2, are exempt from this rule.

10 CSR 10-6.220, *Restriction of Visible Air Contaminants*

Because the coating and molding booths are equipped with particulate control equipment, it is believed that they are not a source of visible emissions. Further the emission units are subject to the requirements of 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*, which will serve to limit particulate emissions.

Construction Permit Revisions

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

Missouri Department of Natural Resources Construction Permit #052004-007A

The conditions of this permit supersede all special conditions found in the previously issued construction permits from the Air Pollution Control Program (Permit Numbers 0899-005, 122000-002, 032001-013, 072001-015, 122000- 002A, 092002-008, 032003-018 and 022004-017).

New Source Performance Standards (NSPS) Applicability

None.

Maximum Available Control Technology (MACT) Applicability

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

This standard does not apply because GDX Automotive - Danny Scott Drive does not use any cleaning solvents in the list of applicable solvents for subpart T.

40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

According to §63.7505(c)(4), existing small gaseous fuel boilers and process heaters are not subject to the initial notification requirements in §63.9(b) and are not subject to any requirements in subpart DDDDD or in subpart A of part 63. Small gaseous fuel subcategory includes any boiler or process heater that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment or gas supply emergencies, and has a rated capacity of less than or equal to 10 MMBtu per hour heat input.

All process heaters at GDX Automotive - Danny Scott Drive meet the definition of small gaseous fuel category and are therefore not subject to any requirements in subpart DDDDD or in subpart A of part 63.

40 CFR Part 63, Subpart PPPP, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts*

The permittee has voluntarily agreed to federally enforceable emission limits of less than 10 tons of any single HAP and/or 25 tons of combined HAPs in any consecutive 12-month period. Operating under this condition will ensure that this installation is not a major source for HAPs and is not subject to the MACT requirements for Subpart PPPP.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*

This rule applies to the installation because of the renovation and demolition parts of the subpart, which make the subpart applicable to all sources. It was included as a core permit requirement.

Other Regulatory Determinations

10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

It is highly unlikely that emissions from the natural gas curing ovens will result in an exceedance of 10 CSR 10-5.030. Therefore, this rule was not applied to the curing ovens.

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

This rule applies to the following equipment, and the calculations below verify compliance for both the PM Emission Rate and the PM Concentration for the listed emission units provided that the required control devices are in operation and working properly:

PM Emission Rate Compliance

MHDR (ton/hr) = MHDR (gal/hr) * Density (lb/gal) * (ton/2000 lb)

Emission Rate (lb/hr) = MHDR (ton/hr) * (% solids/100 * 2000 lb/ton) * (1-Transfer Eff/100)*(1-(Overall Control Eff/100))

Emission Unit ID	MHDR (gal/hr)	Density (lb/gal)	MHDR (ton/hr)	% solids	Capture Efficiency (%)	Control Efficiency (%)	Transfer Efficiency (%)	Potential Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)
EU0010	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0020	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0030	0.95	7.7	0.0037	29	95	99.5	75	0.03	0.10
EU0040	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0050	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0060	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0070	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0080	1.80	9.24	0.0083	50	95	99.5	75	0.11	0.17
EU0085	1.80	7.28	0.0066	50	95	99.5	75	0.09	0.14
EU0090	1.80	7.28	0.0066	50	95	99.5	75	0.09	0.14
EU0095	1.80	9.24	0.0083	50	95	99.5	75	0.11	0.17
EU0100	4.80	9.24	0.0222	50	95	99.5	75	0.30	0.32
EU0110	2.70	9.24	0.0125	50	95	99.5	75	0.17	0.22

PM Concentration Compliance

Emission rate (gr/dscf) = Emission Rate (lb/hr)*7000 (grains/lb)/Stack flow rate (SCFM)/60(min/hr)

Flow rates converted from actual to standard conditions using the ideal gas law.

Emission Unit ID	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
EU0010	0.06	77	10,084	9,915	0.001	0.30
EU0020	0.06	77	10,084	9,915	0.001	0.30
EU0030	0.03	77	10,084	9,915	0.0003	0.30
EU0040	0.06	77	6,742	6,629	0.001	0.30
EU0050	0.06	77	10,084	9,915	0.001	0.30
EU0060	0.06	77	6,742	6,629	0.001	0.30
EU0070	0.06	77	10,084	9,915	0.001	0.30
EU0080	0.11	77	19,500	19,173	0.001	0.30
EU0085	0.09	77	19,500	19,173	0.001	0.30
EU0090	0.09	77	19,500	19,173	0.001	0.30
EU0095	0.11	77	19,500	19,173	0.001	0.30
EU0100	0.30	77	10,084	9,915	0.004	0.30
EU0110	0.17	77	10,084	9,915	0.002	0.30

Extruders

10 CSR 10-6.400 was not applied to the extruders because each unit has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter and is therefore exempt according to §(1)(B)11.

Emission Point	Associated Equip.	Process Weight Rate (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor (EF) Reference	Potential Uncontrolled Emission Rate (lb/hr)
E1-X	Line 1 Rubber Extrusion	0.58	2.0x10 ⁻⁸	2004 EIQ	1.16x10 ⁻⁸
E2-X	Line 2 Rubber Extrusion	0.36	2.0x10 ⁻⁸	2004 EIQ	7.2x10 ⁻⁹
SE3-X	Line 3 Rubber Extrusion	0.32	2.0x10 ⁻⁸	2004 EIQ	6.4x10 ⁻⁹
E4-X	Line 4 Rubber Extrusion	0.58	2.0x10 ⁻⁸	2004 EIQ	1.16x10 ⁻⁸
E5-X	Line 5 Rubber Extrusion	0.58	2.0x10 ⁻⁸	2004 EIQ	1.16x10 ⁻⁸
SE6-X	Line 6 Rubber Extrusion	0.36	2.0x10 ⁻⁸	2004 EIQ	7.2x10 ⁻⁹
SE7-X	Line 7 Rubber Extrusion	0.35	2.0x10 ⁻⁸	2004 EIQ	7.0x10 ⁻⁹
E8-X	Line 8 PVC Extruder	0.0601	2.0x10 ⁻⁸	Assumed EF for PVC extruder equivalent to EF of rubber extruder	1.2x10 ⁻⁹

Flock Booths (EU0120, EU0150, EU0180, EU0200, EU0260)

The adhesive and flock application is a two-part process. In the first part of the process, referred to as the “flock booth”, a hose drips adhesive on the rubber/PVC and the adhesive is spread with paint brushes. In the second part of the process, the rubber/PVC is conveyed to the “flock house” where polyester flock is shaken onto the rubber/PVC parts and an electrostatic charge is applied. There are baghouse systems installed, which are designed to collect flock during this part of the process. These baghouses are considered process equipment and exhaust within the building. There are no stacks or vents in the “flock house.” Consequently, minimal particulate emissions would be expected from the application of adhesives and flock, and, therefore 10-6.400 was not applied.

Curing Ovens

The curing ovens may emit air contaminants from the associated operations in addition to the products of combustion. However, it is highly unlikely that emissions will result in an exceedance of 10 CSR 10-6.400. Therefore, this rule was not applied to these emission units.

Corner Flockers #1 and #2 (EU0270 & EU0280)

The corner flocker processes entails GDX Automotive personnel using an artist brush to apply flock manually from a small cup. There are no PM emissions from this process. Therefore and 10 CSR 10-6.400 was not applied to these emission units.

On January 30, 2002, the Air Pollution Control Program received the Initial Part 70 application. In an email received on February 1, 2007, GDX Automotive stated that they would accept voluntary limits in order to go to an Intermediate Operating Permit.

PW002

GDX Automotive is not required to meet the 12-month rolling average of less than 25 tons of combined HAPS and 10 tons of any single for the first eleven months of the permit. The permittee is still in transition to water-based adhesives and a no HAP primer. GDX Automotive stated in an email sent on February 6, 2007, that by the time the permit was issued they would have the transitions in place to show compliance.

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 APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

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