

STATE OF MISSOURI



PERMIT BOOK

DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

082008-007

Permit Number:

Project Number: 2008-04-022

Parent Company: Kawasaki Heavy Industries Ltd.

Parent Company Address: 1-1 Kawasaki-Cho, Akashi, Japan

Installation Name: Kawasaki Motors Manufacturing Corporation

Installation Address: 28147 Business Highway 71, Maryville, MO 64468

Location Information: Nodaway County, S31, T64, R35

Application for Authority to Construct was made for:

The installation of a crankshaft machining line #7 and a cylinder head machining line #8 that will emit Volatile Organic Compounds (VOCs) from the oils used (emission point MMF). An aluminum die casting machine (DCF12) with a Maxium Hourly Design Rate (MHDR) of 0.435 tons of metal produced per hour and an aluminum alloy melting furnace (DCF11) with a natural gas MHDR of 2472 standard cubic feet per hour will also be installed. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required.*

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

AUG 12 2008

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these)

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

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

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

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Permit No.	
Project No.	2008-04-022

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Kawasaki Motors Manufacturing Corporation
Nodaway County, S31, T64, R35

1. Superseding Condition
 - A. Special conditions 1. A. B. and C. found in the previously issued construction permit number 112000-010 from the Air Pollution Control Program is superseded.
 - B. Special conditions 1. A., B., and C. found in the previously issued construction permit number 092007-011 from the Air Pollution Control Program is superseded.
2. Emission Limitations
 - A. Kawasaki Motors Manufacturing Corporation shall emit less than 250 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.
 - B. Kawasaki Motors Manufacturing Corporation shall emit less than ten (10.0) tons individually or twenty-five (25.0) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period.
 - C. Kawasaki Motors Manufacturing Corporation shall emit less than 250 tons of Carbon Monoxide (CO) from the entire installation in any consecutive 12-month period.
 - D. Kawasaki Motors Manufacturing Corporation shall emit less than 3.0 tons of Fluorides from the entire installation in any consecutive 12-month period.
 - E. Kawasaki Motors Manufacturing Corporation must determine the total amount of VOC, HAPs, CO, and Fluorides emitted from the installation. Attachment A, B, C, and D or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A, 2.B, 2.C, and 2.D.

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Permit No.	
Project No.	2008-04-022

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- F. Kawasaki Motors Manufacturing Corporation 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 at the installation.

- G. Kawasaki Motors Manufacturing Corporation 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 during which the records from Special Condition Number 2.E indicate that the source exceeds the limitation of Special Conditions Number 2.A, 2.B, 2.C, and 2.D.

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

Project Number: 2008-04-022
Installation ID Number: 147-0023
Permit Number:

Kawasaki Motors Manufacturing Corporation
28147 Business Highway 71
Maryville, MO 64468

Complete: April 7, 2008

Parent Company:
Kawasaki Heavy Industries Ltd.
1-1 Kawasaki-Cho
Akashi, Japan

Nodaway County, S31, T64, R35

REVIEW SUMMARY

- The installation of crankshaft machining line #7, cylinder head machining line #8 and an aluminum Die Casting machine with a Maximum Hourly Design Rate (MHDR) of 0.435 tons of metal charged and a melting furnace with a natural gas MHDR of 2472 standard cubic feet per hour.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment. The HAP limit in this permit is to correct and remove the equipment limit found in permit number 112000-010, as it was redundant when an installation wide HAP limit was applicable.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are below de minimis levels by limiting fluoride emissions.
- This installation is located in Nodaway County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B),

Table 2].

- Ambient air quality modeling was performed to determine the ambient impact of PM₁₀.
- Emissions testing is not required for the source.
- A revision to the Part 70 Operating permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Kawasaki Motors Manufacturing Corporation operates a gasoline engine manufacturing installation in Maryville, Missouri, (Nodaway County). Kawasaki Motors builds engines ranging from 4.5 horsepower (hp) up to 35.0 hp. These engines are primarily used in walk-behind lawn mowers, riding lawn mowers and all-terrain vehicles.

Kawasaki Motors Manufacturing Corporation is not considered an existing major source for construction permitting because of the 250-ton limit established in Permit # 092005-001 and 062007-004. For New Source Review purposes, it is considered a minor source. The installation submitted a Part 70 State Operating Permit application (Project Number: 2006-03-047) on March 09, 2006.

The following projects for Kawasaki Motors Manufacturing Corporation have been processed by the Air Pollution Control Program.

Table 1: Previous Permit Projects

Permit Number	Description
092007-011	2007-05-059 Endurance testing Facility
062007-004	2006-10-085: Use of aviation fuel
	2006-09-062: Use of aviation fuel-applicability determination
092005-001A	2006-04-058: Amendment remove conditions
No Permit Required	2006-03-045: Die casting and crankcase machining
	2006-03-047: Part 70 Operating Permit Amendment
	2005-10-020: Update Part 70 Operating Permit
092005-001	2005-05-106: Install four new processes
	2004-11-068: Intermediate Operating Permit Amendment
012005-002	2004-10-003: Add two small engine assembly lines
032004-006	2003-10-049: Installation of a machining operation
No Permit Required	2003-06-036: Engine testing exhaust fans
	2003-05-092: Intermediate Operating Permit Amendment
082003-011	2003-05-091: Installation of a engine assembly line
	2003-02-097: Applicability, permit required for new lines.
	2002-06-097: Intermediate Operating Permit application
	2002-05-002: Correction or amendment change retaining compound.
No Permit Required	2001-05-090: 680cc LPG engines.
No Permit Required	2001-03-092: Installation of natural gas engines.

Permit Number	Description
062001-001	2001-02-113: Installation of a wet vacuum impregnation system to seal porosity in aluminum parts
112000-010	2000-09-054: Installation of two (2) gasoline engine assembly lines
0699-024	1999-03-119: Installation of an assembly line for building internal combustion engines and installation of an electrode position paint system
	1998-05-636: major source review, closed out
0598-012	1998-02-0221: Addition of a wet paint booth and a process heater
	147-0023-020: Intermediate Operating Permit Application
0897-034	147-0023-017: Installation of a gasoline engine assembly line
0797-005	3340-0023-017: Installation of four (4) machining lines and six (6) heating/ventilation units
0494-009	3340-0023-016: Installation of an aluminum die casting machine and a machine process
0493-011	3340-0023-015: Installation of two (2) aluminum die casts and melting furnaces
0193-001	3340-0023-011: Installation of a powder paint booth
1291-004	3340-0023-009: Addition of chromate aluminum parts
	3340-0023-008: Amendment to 0791-001
0791-001	3340-0023-007: Installation of gasoline engine assembly line and aluminum scrap furnaces
1190-004	3340-0023-006: Addition of connecting rod machine line and injection molding
0890-001	3340-0023-005: Installation of aluminum die cast engines

Kawasaki Motors Manufacturing Corporation has had several permitting actions take place over a relatively short period of time. Kawasaki Motors Manufacturing Corporation asserts that production is expanded to be consistent with demand and need for new engines, as decided by the parent company, Kawasaki Heavy Industries Ltd. Although several projects involve machining, the parts made serve different purposes, and so, should not be considered together.

PROJECT DESCRIPTION

Kawasaki proposes to install three new processes at (147-0023) the gasoline engine manufacturing installation at this time.

Crankshaft Machining Line #7

The crankshaft machining line will primarily machine FH680V crankshafts but will also be capable of machining 4240 series and FX850V crankshafts. These crankshafts are made of ductile iron. Coolants, lubricants and cutting oils will be used in the process recorded in emission point MMF. The applicant determined their maximum usage of coolants, lubricants and oils at the installation to have an MHDR of 0.01 tons per hour.

Cylinder Head Machining Line #8

The machining line will primarily machine FH680V aluminum cylinder heads. Coolants, lubricants and cutting oils will be used in this process. The applicant determined their maximum usage of coolants, lubricants and oils at the installation to have an MHDR of 0.01 tons per hour.

Aluminum Alloy #6 melting furnace and a new die cast machine

The melting furnace supplies molten aluminum metal for the die casting machine. The die cast machine is used for making small engine parts. The melting furnace will be

natural gas fired and rated at 2.39 Million Btu/hr. The throughput of aluminum alloy will be approximately 2505.6 tons per year.

Hydrogen fluoride (HF) which is also known as hydrofluoric acid is considered a HAP. Hydrogen fluoride is not considered a PM. HF HAP emissions and fluoride (F⁻) emissions are a concern for this project because of the use of fluxes. Fluxes that contain fluoride (F⁻) a reduced form of fluorine (F) may react with moisture to form HF. Both organic and inorganic compounds containing the element fluorine are considered fluorides. HF is an inorganic fluoride.

The compounds in the fluxes submitted in the application that contain fluoride are potassium fluorosilicate (K₂SiF₆ synonym; potassium silicofluoride) and potassium aluminum fluoride (KAlF₄). Two fluxes were submitted for this review Flux SF-350 contains both compounds at 40 and 10 percent by weight and Flux 206 only contains potassium aluminum fluoride at 10 percent by weight.

However, the addition of fluoride flux generating HF (HAP emissions) and/or fluoride emissions is not well understood. Part of the action of the fluorides in the flux is thought to be due to the liberation of fluorine, which attracts silicates and dirt. Because of agitation, the oxides and the dirt rise to the top of the molten metal where they can be skimmed off. HF is very reactive and very corrosive. Corrosive damage is typically not observed.

A small amount of HF emissions could easily exceed the Screen Modeling Action Level (SMAL) of 0.1 tons (200 pounds) per year requiring this installation to show compliance with the Risk Assessment Levels for HF. Another permitting concern with the use of the flux is the specific de minimis level that exists for fluorides at 3.0 tons per year. Exceeding this value will make the installation a minor source for fluorides. This PTE 3.0 ton per year de minimis level is found in Table 1 De Minimis Emission levels per 10 CSR 10 -6.020 Definitions and Common Reference Tables. The de minimis level for fluorides is also the SMAL value for fluoride. This installation uses two types of flux a wall cleaner flux and injection flux. The wall cleaner is formulated to remove aluminum oxide which typically accumulates at the metal line of the melting furnace and injection flux which are used to remove impurities in the metal. Many factors that control metal casting quality are out of the metal caster's control and the flux addition rate often depends on these factors. Casting requirements, metal alloy selected, the casting process selected, and the actual casting solidification process selected tends to determine the fluxing rate. Metal quality depends on control of two factors hydrogen content and metal inclusions. Melting in air high temperatures, humidity, oxide covered charge particles, returns, trim gates and runners and sand system debris all contribute to metal impurities and determines the fluxing rate. Table 2 lists the amount used since 2003 to 2007.

The installation reports the fluorides released through the use of the flux in all die cast machines (emission point DCMFCE17) as particulate matter and not as a HAP. For this project, this amount of PM is considered to be fluoride. Assuming all of the fluoride is emitted as a PM is a conservative assumption, but may not be fully correct. Realistically, we do not have a method to calculate how much HAP is emitted as HF or

how much fluoride is formed. Counting all of the emission from the flux as fluoride, without counting any as the HAP HF appears to be a reasonable assumption given the well-documented process.

Presently, the total amount of flux used in 2007 was divided between the 8 die cast machines. That number is multiplied by the percent fluoride in the flux and becomes the annual amount.

Table 2: EIQ submittal for Emission Point DCFMFC17

Year	Tons of PM (Fluorides) per year
2007	1.44
2006	2.21
2005	3.15
2004	1.43
2003	1.26

From Table 2, it can be seen that in 2005 the amount was not below the 3.0 tons per year de minimis level for fluorides. The use of fluxes with fluorine or HF emissions has not been addressed in other Kawasaki permits. The amount of flux required depends on a number of factors as defined previously. The PTE of fluorine emissions is 7.884 tons per year based on the maximum rate MHDR of emission point DCMFCE17 Fugitive chemicals emitted fluxing furnace of 0.009 tons per hour of fluoride used for 8760 hours. Because the fluoride PTE exceeds the amount of 3.0 tons per year de minimis level for fluorides, a limit was placed on the amount of fluorides emitted to less than 3 tons per year. When that portion of the PM₁₀ PTE that is fluoride is lowered to the 3 ton per year limit, it eliminates the need for PM₁₀ modeling to determine increment consumption, NAAQs modeling, and compliance with the risk assessment levels (RAL) if the SMAL value for fluorides was exceeded. .

The installation indicated that the existing #6 die cast machine and the associated melting furnace permitted in 0493-011 would be removed. The installation indicated that this was not a debottlenecking operation. The MHDR of the new die cast machine is estimated to run at 80 percent efficiency and is based on 40 parts per hour at a rate of 24 hours per day 5 days a week 48 weeks per year.

The potential to emit calculation for VOCs (emission point MMF) for the machining lines was calculated by taking the MHDR of total product through the machining lines dividing out the percent of the amount of each VOC containing product to obtain the potential to emit of each VOC containing product.

The installation has an existing VOC limit of 250 tons per rolling 12 month period and a 10 ton individual HAP and a 25 ton combined HAP limit per 12 month period. The equipment installed in this permit is considered to be part of the installation wide limits. The Special Condition 1. A. B. and C. in Permit # 112000-010 required that the HAPs for the individual assembly lines 6 and 7 be recorded. Kawasaki Motors Manufacturing Corporation will show compliance with the Special Conditions 1. A. B. and C. in permit number 112000-010 by following the special conditions listed in this permit.

EMISSIONS/CONTROLS EVALUATION

Potential VOC emissions from machining (MMF) were determined based on historical usage and a conservative estimate of increased usage for the proposed processes (installation total potential machining oil usage of 50,000 gallon annually). Calculations were done using a mass balance and the assumption that all of the VOCs contained in the machining oils will be emitted to the ambient air. The maximum rate for all machining lines is 0.01 tons per hour. The annual consumption rate of cutting fluid and washing fluids (0.3985 tons per year) was determined by the applicant. The rate was divided by 8760 to determine an hourly rate for this process of 0.000045 tons per hour.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Existing potential for the remaining pollutants was taken from Permit No. 092007-011. Existing actual emissions were taken from the applicant's 2007 Emissions Inventory Questionnaire (EIQ) submittal. The following table provides an emissions summary for this project.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (2007EIQ)	Potential Emissions of the Application	Conditioned Potential
PM ₁₀	15.0	30.07	8.05	16.11	11.23**
SO _x	40.0	23.93	0.22	0.0	N/A
NO _x	40.0	<40	22.98	0.02	<40
VOC	40.0	<250	122.20	0.66	<250
CO	100.0	<250	125.71	0.0	<250
Fluorides	3.0	N/D	N/A	7.88	<3.0
HAPs	10.0/25.0	<10.0/25.0	3.35	N/A	<10.0/25.0

N/A = Not Applicable; N/D Not Determined

* Existing potential emissions totals are taken from Permit 092007-011 with Project Number: 2007-05-059.

** Based on limiting the PM₁₀ portion that is fluoride from the fluxes.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

APPLICABLE REQUIREMENTS

Kawasaki Motors Manufacturing Corporation shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Timothy Paul Hines
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated April 01, 2008, received April 07, 2008, designating Kawasaki Heavy Industries Ltd. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey.

Attachment A
VOC and CO Monthly Compliance Worksheet
Kawasaki Motors Manufacturing Corporation Nodaway County, S31, T64, R35
Project Number: 2008-04-022 Installation ID Number: 147-0023

Emission Point	Usage Units	Usage Amt.	VOC Emission Factor	CO Emission Factor	VOC (lb)	CO (lb)
Example Gasoline Emission Point	gallons	76.5000	0.3939 lb/gal	8.151 lb/gal	30.1334	623.5515
AET1	gallons					
AET2	gallons					
AET3	gallons					
AET4	gallons					
AET5	gallons					
AET6	gallons					
AET7	gallons					
AET8	gallons					
AET9	gallons					
AET10	gallons					
AET11	gallons					
DCF01	MMCF					
DCF01	tons					
DCF03	MMCF					
DCF05	MMCF					
DCF07	MMCF					
DCF09	MMCF					
DET4	gallons					
DET5	gallons					
PE10	MMCF					
PE10B	MMCF					
ETF1	gallons					
SH1	MMCF					
ETC	gallons					
ASTC	gallons					

Some Emission Points need to be segmented for calculation

(lb/2000) Attachment A Total Tons

Note: The VOC content of reclaimed VOC material transferred to a contract reclamation service can be subtracted from the VOC total. A 12-Month rolling CO emission total of CO of less than or equal to 250.0 tons indicates compliance.

Ms. LeAnne Ebrecht
Environmental Technician
Kawasaki Motors Manufacturing Corporation
28147 Business Highway 71
Maryville, MO 64468

RE: New Source Review Permit - Project Number: 2008-04-022

Dear Ms. Ebrecht:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Tim Hines 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 attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:thl

Enclosures

c: Kansas City Regional Office
PAMS File 2008-04-022
Permit Number