

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.

Permit Number: 092007-005 Project Number: 2007-05-016

Parent Company: Q.E.P. Co. Inc.

Parent Company Address: 1001 Broken Sound PKWY NW, Suite A, Boca Raton, Florida 33487

Installation Name: Roberts/QEP

Installation Address: 2501 Lakeview Drive, Mexico, MO 65265

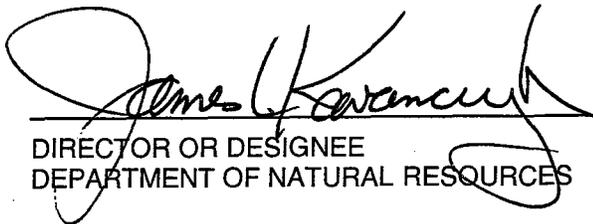
Location Information: Audrain County, Section, Township, Range

Application for Authority to Construct was made for:  
Three resin tanks and two resin mixers. 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.

SEP 12 2007

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 with 15 days after the actual start up of this (these) air contaminant source(s).

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.

|             |             |
|-------------|-------------|
| Page No.    | 3           |
| Permit No.  |             |
| Project No. | 2007-05-016 |

### 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."*

Roberts/QEP

Audrain County, Section, Township, Range

1. **Superseding Condition**  
The conditions of this permit supersede special condition 2 found in the previously issued construction permit (Permit Number 0290-007A) from the Air Pollution Control Program.
2. **Emission Limitation**
  - A. Roberts/QEP shall emit less than 40 tons of Volatile Organic Compounds (VOCs) from adhesive production line (EP-1) in any consecutive 12-month period.
  - B. Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A). Roberts/QEP shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in this equipment.
  - C. Roberts/QEP 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 1(B) indicate that the source exceeds the limitation of Special Conditions Number 1(A).
3. **Operating Procedure**  
Roberts/QEP shall keep cleaning solutions in sealed containers whenever the materials are not in use. Roberts/QEP shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

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

Project Number: 2007-05-016  
Installation ID Number: 007-0039  
Permit Number:

Roberts/QEP  
2501 Lakeview Drive  
Mexico, MO 65265

Complete: 04/27/2007

Parent Company:  
QEP. Co. Inc.  
1001 Broken Sound PKWY NW, Suite A  
Boca Raton, Florida 33487

Audrain County, Section, Township, Range

REVIEW SUMMARY

- Roberts/QEP has applied for authority to three new resin tanks and two resin mixers.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) 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 volatile organic compounds (VOCs) are limited to de minimis levels.
- This installation is located in Audrain 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 not performed since potential emissions of the application are conditioned to de minimis levels.
- Emissions testing is not required for the equipment.

- A Basic Operating Permit application is required for this installation.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Roberts/QEP operates a resin mixing facility that produces liquid adhesive. They are a minor source for all criteria air pollutants, located in Audrain County, and hold a basic operating permit.

The following construction permits and amendments have been issued to Roberts/QEP from the Air Pollution Control Program.

| Permit Number | Description                   |
|---------------|-------------------------------|
| 0290-007      | Manufacture latex-based floor |
| 0997-008      | Natural gas                   |
| 0290-007A     | Change resin mixing           |

### PROJECT DESCRIPTION

Roberts/QEP has applied for authority to construct one resin tank, one clay slurry mixer and one adhesive mixer. This new equipment will allow Roberts/QEP additional flexibility in the production of different products. The new equipment has a maximum hourly design rate of 438 gallons of adhesive per hour or 1.79 tons per hour. Roberts/QEP provided material safety data sheets (MSDS) for all materials used in the production of adhesive. No air pollution control equipment is use on this source. Also, Roberts/QEP has requested that the production limit set in permit 0290-007A, which applied to the adhesive production line, be replaced with a 40 ton per year limit on VOCs from the adhesive production line.

### EMISSIONS/CONTROLS EVALUATION

Emissions were calculated using Michigan Department of Environmental Quality document Emission Calculation Fact Sheet: Plastic Production and Products Manufacturing. Currently there are no AP-42 emission factors for adhesive manufacturing. An emission factor of 12.5 pounds of VOC per ton of adhesive produced was multiplied by the MHDR to determine the potential emissions of the application. The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

| Pollutant        | Regulatory De Minimis Levels | Existing Potential Emissions | Existing Actual Emissions (2005 EIQ) | Potential Emissions of the Application | New Project Conditioned Potential |
|------------------|------------------------------|------------------------------|--------------------------------------|--|-----------------------------------|
| PM <sub>10</sub> | 15.0                         | 0.3                          | 0.01                                 | N/A                                    | N/A                               |
| SO <sub>x</sub>  | 40.0                         | 0.05                         | N/D                                  | N/A                                    | N/A                               |
| NO <sub>x</sub>  | 40.0                         | 12.8                         | 0.89                                 | N/A                                    | N/A                               |
| VOC              | 40.0                         | 91.0                         | 3.76                                 | 98.00                                  | < 40                              |
| CO               | 100.0                        | 3.2                          | 0.23                                 | N/A                                    | N/A                               |
| HAPs             | 10.0/25.0                    | N/D                          | 0.03                                 | N/A                                    | N/A                               |

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

### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs are conditioned to de minimis levels.

### APPLICABLE REQUIREMENTS

Roberts/QEP 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

### 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 April 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.

\_\_\_\_\_  
Michael Mittermeyer  
Environmental Engineer

\_\_\_\_\_  
Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 4/23/2007, received 4/27/2007, designating Roberts Capital as the owner and operator of the installation.
- Michigan Department of Environmental Quality document Emission Calculation Fact Sheet
- Northeast Regional Office Site Survey, dated 05/03/2007.
- Material Safety Data Sheets



Mr. John Ross  
Plant Manager  
Roberts/QEP  
2501 Lakeview Drive  
Mexico, MO 65265

RE: New Source Review Permit - Project Number: 2007-05-016

Dear Mr. Ross:

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 Michael Mittermeyer at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or call me 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:mml

Enclosures

c: Northeast Regional Office  
PAMS File 2007-05-016

Permit Number: