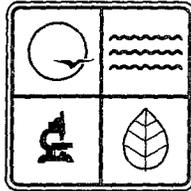


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



PERMIT BOOK

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: **122006-015** Project Number: **2004-05-036**

Owner: **Sedalia Stripping, Inc.**

Owner's Address: **1411 Waterloo Drive, Sedalia, MO 65301**

Installation Name: **Sedalia Stripping, Inc.**

Installation Address: **1411 Waterloo Drive, Sedalia, MO 65301**

Location Information: **Pettis County, S32, Cedar, R21W**

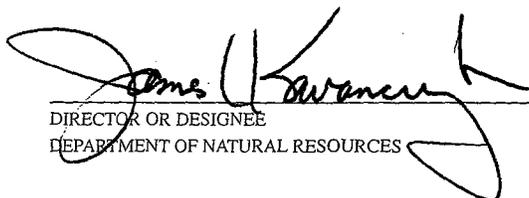
Application for Authority to Construct was made for:

Installation of a paint stripping operation. This installation was constructed prior to receipt of a permit from the Air Pollution Control Program. Obtaining this permit is part of a remedial action required by the Air Pollution Control Program. 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 (listed as attachments starting on page 2) are applicable to this permit.

DEC 19 2006

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

You must notify the 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) 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 as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant 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 Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

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

Page No.	2
Permit No.	
Project No.	2004-05-036

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."

Sedalia Stripping, Inc.
Pettis County, S32, R21W

1. Emission Limitation
 - A. Sedalia Stripping, Inc. shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period.
 - B. Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A). Sedalia Stripping, Inc. 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 this installation.
 - C. Sedalia Stripping, Inc. 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).

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

Project Number: 2004-05-036
Installation ID Number: 159-6003
Permit Number:

Sedalia Stripping, Inc.
1411 Waterloo Drive
Sedalia, MO 65301

Complete: October 19, 2006
Reviewed: October 20, 2006

Parent Company:
Sedalia Stripping, Inc.
1411 Waterloo Drive
Sedalia, MO 65301

Pettis County, S32, Cedar, R21W

REVIEW SUMMARY

- Sedalia Stripping, Inc. has applied for authority to install a paint stripping operation.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are methylene chloride (CAS # 75-09-2) and phenol (CAS# 108-95-2).
- 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 HAPs are conditioned to below major source levels.
- This installation is located in Pettis 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 phenol.

- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Sedalia Stripping, Inc. operates a paint stripping operation at Pettis County. This installation has been in operation since 1984. No permits have been issued to Sedalia Stripping, Inc. from the Air Pollution Control Program. A Notice of Violation (NOV) 2127KC was issued to Sedalia Stripping, Inc. for constructing and operating the installation without a construction permit.

PROJECT DESCRIPTION

This installation removes paint and rust from automotive wheels. To remove paint and rust, the wheels are dipped into a dipping tank containing BENCO #B91 Industrial Paint Remover. According to the material safety data sheet (MSDS) provided with the revised application dated January 7, 2006, this paint remover contains 5-10% by weight (wt.%) of methylene chloride and 5-10% by wt. of phenol. Methylene chloride and phenol are both HAP and their potential to emit are 30.12 tons per year each. However, Sedalia Stripping, Inc. has proposed to keep recordingkeeping of their material usage (paint remover) to ensure the annual emissions do not exceed 25 tons combined HAPs and 10 tons individual HAP.

EMISSIONS/CONTROLS EVALUATION

VOCs and HAP emissions were analyzed using information from the Material Safety Data Sheet (MSDS) submitted with the permit application and through the use of a mass balance around the process. The existing actual emissions were estimated from the 2004, Emission Inventory Questionnaire (EIQ). 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 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2004 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	N/A	N/A	N/A
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	7.0	60.42**	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	10.0/25.0	N/A	N/D	60.42	< 25.0
Methylene Chloride	10.0	N/A	N/D	30.21	< 10.0
Phenol	10.0	N/A	N/D	30.21	< 10.0

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

**Potential Emissions of VOC are indirectly conditioned to below de minimis level.

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 from this installation are conditioned to below major levels for HAPs.

APPLICABLE REQUIREMENTS

Sedalia Stripping, Inc. 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 April 1 for the previous year's emissions.
- *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*

AMBIENT AIR QUALITY IMPACT ANALYSIS

Screen 3 modeling analysis is performed on phenol since potential emissions are above the threshold levels. The modeling results are based on stack parameters submitted in the application and the potential emissions of the application. The following table lists the predicted individual HAP impact from the subject sources and comparison with the applicable Risk Assessment Levels (RAL).

Table 2: Screen3 Modeling Results

Pollutants	Modeled Impact	Risk Assessment Level	Time Period
Phenol	233.68 $\mu\text{g}/\text{m}^3$	450 $\mu\text{g}/\text{m}^3$	24-Hour
	46.74 $\mu\text{g}/\text{m}^3$	95 $\mu\text{g}/\text{m}^3$	Annual

As indicated in the previous table, phenol emissions from the installation are expected to be in compliance with the RAL.

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.

 Fuad Wadud
 Environmental Engineer

 Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 7, 2006, received January 12, 2006, designating Sedalia Stripping, Inc. as the owner and operator of the installation.
- Material Safety Data Sheet (MSDS) provided by the applicant.
- Kansas City Regional Office Site Survey, dated May 18, 2004.

Mr. Larry G. Foster
President
Sedalia Stripping, Inc.
1411 Waterloo Drive
Sedalia, MO 65301

RE: New Source Review Permit - Project Number: 2004-05-036

Dear Mr. Foster:

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 and your new source review permit application 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 me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:fwl

Enclosures

c: Kansas City Regional Office
PAMS File: 2004-05-036

Permit Number: