



Matt Blunt, Governor • Doyle Childers, Director

## DEPARTMENT OF NATURAL RESOURCES

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DEC - 8 2006

Mr. Les Keleher, Plant Manager  
Wilson Trailer Sales, Inc.  
1600 Route DD  
Moberly, MO 65270

Re: Wilson Trailer Sales, Inc., 175-0061  
Permit Number: **OP2006-090**

Dear Mr. Keleher:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or write the Department of Natural Resources' Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS: rck

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII  
Northeast Regional Office  
PAMS File: 2006-02-058



## 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:** OP2006-090

**Expiration Date:** DEC - 7 2011

**Installation ID:** 175-0061

**Project Number:** 2006-02-058

**Installation Name and Address**

Wilson Trailer Sales, Inc.  
1600 Route DD  
Moberly, MO 65270  
Randolph County

**Parent Company's Name and Address**

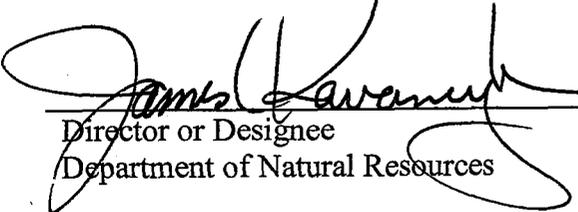
Wilson Trailer Company  
4400 South Lewis Boulevard  
Sioux City, IA 51106

**Installation Description:**

Wilson Trailer Sales, Inc. operates a truck trailer manufacturing facility. Truck trailers are manufactured from metal sheets and bars by washing, cutting and welding. The finished trailers are painted in a spray booth, followed by baking of the coating in natural gas heated furnaces. Operations include metal cutting, welding, metal parts washing prior to painting, spray painting, and baking of the coating. Cleaning solvent is used to clean the spray guns. Miscellaneous natural gas fired heaters are used for building heat, furnaces and a water evaporator.

DEC - 8 2006

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Wilson Trailer Sales, Inc. operates a truck trailer manufacturing facility. Truck trailers are manufactured from metal sheets and bars by washing, cutting and welding. The finished trailers are painted in a spray booth, followed by baking of the coating in natural gas heated furnaces. Operations include metal cutting, welding, metal parts washing prior to painting, spray painting, and baking of the coating. Cleaning solvent is used to clean the spray guns. Miscellaneous natural gas fired heaters are used for building heat, furnaces and a water evaporator.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.53	0	.029	30.44	0.24	0	0
2004	0.36	0	0.21	12.27	0.18	0	0
2003	0.30	0	0.19	5.56	0.16	0	0
2002	0.18	0	0.20	6.37	0.16	0	0
2001	0.12	0	0.17	6.25	0.14	0	0.27

### 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	Spray painting booth; includes spray painting and two natural gas furnaces that are used to maintain the temperature of the spray booth; EP01, EP04, EP05 (2005 EIQ)

### 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

- Wash booth
- Welding
- Gun cleaning
- 2 Wash booth furnaces, #1 and #2
- 3 Room furnaces (Training, Conference, and Main)
- 2 Weather rite plant furnaces
- 3 CoRay vac plant furnaces
- Wash booth water heater
- Evaporator burner
- Cure Booth

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) Construction Permit #0199-022

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

#### Emission Limitation:

- 1) The permittee shall emit, from the entire installation, less than 10 tons of any single hazardous air pollutant (HAP) and 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.
- 2) The permittee will record monthly paint, solvent, and primer purchases.

#### Recordkeeping:

- 1) The permittee shall record the monthly total of individual and combined HAP emissions from this installation (See Attachment A and B).
- 2) These records shall be made immediately available for inspection to the Missouri Department of Natural Resources personnel upon request.
- 3) 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, MO 65102, no later than ten days after the end of the month during which the records indicate that the sources exceeded the emission limitation.
- 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.

<b>EU0010 – Paint Spray Booth</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>2005 EIQ Reference #</b>
EU0010	Paint spray booth used for painting finished trailers	SLI, CPBC 701612, manufactured 1995	EP01, which includes EP04 and EP05

#### **PERMIT CONDITION EU0010-001**

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

#### **Emission Limitation:**

- 1) Particulate matter shall not be emitted from EU0010 in excess of 5.25 lb/hr.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

#### **Monitoring:**

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

#### **Record Keeping:**

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. (See Attachment C)
- 2) The permittee shall maintain records of the inspections of mat/panel including when they occur (See Attachment F).
- 3) Attachments C and F contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
- 5) All records shall be maintained for five years.

#### **Reporting:**

Reports of any deviations from monitoring, record keeping 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 EU0010-002**

10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
  - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Record Keeping:**

- 1) The permittee shall maintain records of all observation results (see Attachment D or E), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment G)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment F)
- 4) Attachments D or E, F and G contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping 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 10-3.030 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 Wilson Trailer Sales, Inc. 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.

**10 CSR 10-3.090 Restriction of Emission of Odors**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

**This requirement is not federally enforceable.**

**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.

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 record keeping 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**

- 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 Record Keeping and Reporting Requirements

- 1) Record Keeping
  - 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, record keeping, 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 record keeping 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 Les Keleher, Plant Manager. 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.





**Attachment C**

**This attachment may be used to help meet the record keeping requirements of Permit Condition EU0010-001.**

$$\begin{aligned} \text{Maximum Allowable PM Emissions} &= E \text{ (lb/hr)} = 4.1(P)^{0.67} \text{ if } P \leq 30 \text{ tons/hr} \\ &= E \text{ (lb/hr)} = 55(P)^{0.11} - 40 \text{ if } P > 30 \text{ tons/hr} \end{aligned}$$

P = Process weight rate (tons/hr)

E = Allowable emission rate limit (lb/hr)

Potential PM Emission Rate =

$$\text{MHDR(tons/hr)*Emission Factor(lb/ton)*[1-((Control Eff/100)(Capture Eff/100))]*[1-(Transfer Eff/100)]$$

Emission Unit	Maximum Hourly Design Rate (tons/hr)	PM Emission Factor (lb/ton)	Emission Factor Reference	Transfer Eff. (%)	Capture Eff. (%)	Control Device Eff. (%)	Potential PM Emission Rate (lb/hr)	Allowable PM Emission Rate (lb/hr)
EU0010 <sup>a</sup>	0.193	3.13	Mass Balance	85	100	99	.000906	0.189

<sup>a</sup>The MHDR of 0.193 ton/hr was taken from the 2005 EIQ for EP01 and a paint density of 12.09 lb/gal. The emission factor was derived from a mass balance using a maximum percent solids by weight of 86%. The booth captures 100% of the over spray particulate emissions.





**ATTACHEMENT F**  
 Method 9 Opacity Observations

<b>Company:</b>	<b>Observer:</b>
<b>Location:</b>	<b>Observer Certification Date:</b>
<b>Date:</b>	<b>Emission Unit:</b>
<b>Time:</b>	<b>Control Device:</b>

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Start	End

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.  
 Was the emission unit in compliance at the time of evaluation?  Yes  No

\_\_\_\_\_ Signature of Observer



## 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.

The voluntary plant-wide emission limitation PW-001 limits emissions of HAPs to below 10 tons for any single HAP and 25 tons for all HAPs combined. This limitation does not in itself limit the potential to emit VOC, PM, SO<sub>x</sub>, NO<sub>x</sub>, or CO to below the major source threshold of 100 tons. However, the potential to emit was determined to be below the 100 ton threshold. The emissions of VOC were the primary concern. The permittee currently is limited by the paint booth operation to only coating six (6) trailer per shift and having two (2) shifts per day. If the permittee makes or intends to make changes to coatings or to the process to remove the physical limitations as listed in construction permit 0199-022 that increase any of the other pollutants to greater than 100 tons per year, the permittee would need to apply for 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 February 9, 2006
- 2) 2005 Emissions Inventory Questionnaire, received March 1, 2006;
- 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.

None

### **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 10-3.050, *Restriction of Emission of Particulate Matter From Industrial Processes*

This rule was rescinded from the Missouri Air Rules and Regulations as of March 30, 2001. This regulation has been replaced by 10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes.

10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*

This rule was rescinded from the Missouri Air Rules and Regulations as of May 30, 2000. This regulation has been replaced by 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants.

**Construction Permit Revisions**

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

None

**New Source Performance Standards Applicability**

None

**Maximum Available Control Technology Applicability**

40 CFR Part 63, Subpart M, *Surface Coating of Miscellaneous Metal Parts and Products* PW001 limits this installation to less than major source thresholds for hazardous air pollutants. Therefore, this installation is not subject to this MACT

**National Emission Standards for Hazardous Air Pollutants Applicability**

40 CFR Part 61, Subpart M, *National Emission Standards for Asbestos*, Section 61.145, *Standard for Demolition and Renovation*, applies to this source. This regulation requires the source to make a determination prior to commencement of demolition or renovation of the part of the facility that will be affected for the presence of asbestos.

**Other Regulatory Determinations**

10 CSR 10-6.100, *Alternate Emission Limits*, does not apply to this installation since it is not in an ozone nonattainment area.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, is not applicable to the solvent cleaning of the painting equipment or the solvent metal parts cleaning operation. These processes create only non-particulate solvent emissions.

10 CSR 10-6.400, is not listed as an applicable regulation for the cure booth because the only pollutant emitted is non-particulate VOC and the combustion products of natural gas. The PM emitted from the combustion of natural gas is negligible and the regulation excludes liquids or gases used solely as fuels. Therefore, 10 CSR 10-6.400 was not included as a regulation for the cure booth.

10 CSR 10-6.400, does apply to the paint booth, and limits the particulate emissions from the paint booth to 0.29 pounds per hour. This rate was determined using information from permit 0199-022. The maximum number of trailers painted per shift is 6 trailers. There are two shifts per day averaging 10.5 hours per shift. Therefore, it takes 1.75 hours per trailer to paint. The amount of coating applied per

trailer is 5.5 gallons. The density of the paint/coating is 12.09 pounds per gallon. The resulting maximum hourly design for the process weight (P) is 38 pounds per hour (0.019 tons/hour).

Calculation to 10 CSR 10-6.400

P = Total process weight throughput (ton / hr)

E = Rate of emission, (lbs/hr)

$E = 4.10 * (P)^{0.67}$ , limit of PM emission rate (lb/hr)

$E = 4.10 * (0.019)^{0.67}$

E = 0.29 lb / hr

Paint Booth potential controlled PM emission

Solids Content = 58.83 %

Transfer efficiency = 85 %

Uncontrolled Emission = (5.5 gal/trailer)\*(12.09 #/gal)\*(trailer/1.75 hrs)\*(0.5883)\*(1-.85)  
= 3.35 #/hr

Controlled Emission = (1-0.99)\*(3.35 #/hr)  
= 0.03 #/hr      ■ compliance

The potential emission of PM was calculated from information provided in the 2005 EIQ. Using a percent solids content of 58.83% and a transfer efficiency of 85%, the potential uncontrolled particulate matter was calculated to be 3.35 pounds per hour. The potential controlled emissions using a control efficiency of 99 % is 0.03 pounds per hour and is in compliance. The difference between the control efficiency used and the control efficiency required for compliance is slight, however, this is deemed to be sufficient because the AP42 does not mention with any detail paint booths to be a source of concern for particulate matter. The AP42 list the emission of VOC as the only pollutant of concern and is from the evaporation of the paint vehicle, thinner, or the solvent used to facilitate the application. The atomization of the coating from spray guns does produce liquid droplets of coating which is expected to have some solids content, however due to its wet nature and the fabric paint filters used for control it is expected to be minimal. The source shall keep spare filters on hand to insure that the booth operates with filters in place. The practice of good operational procedures and maintenance for the paint filters as stated in the operating permit will be the only requirement for monitoring and record keeping.

10 CSR 10-6.400 could be considered as to apply to the welding units at the installation. There are 24 steel welding units and 26 aluminum welding units. The welding units are used in the manufacturing of truck trailers. All of the welding units are located at various sites within the building. The heat generated from an electrode/rod and the point of contact with truck trailer produces the PM (all PM is assumed to be less than 10 microns) emitted from the welding processes. There are no capture and control systems for the welding units. The emissions are fugitive within the building. However, if the building itself were considered as a capturing device for all 50 units in sum total with 100% capture, the emissions would be in compliance. The smallest trailer weighs 6300 lbs. and the maximum weight of wire (electrode) consumed in one hour is 953 lbs. for a sum total of 7,253 lbs./hr (3.63 tons/hr). The minimum process weight (P=3.63 ton/hr) allows a PM emission rate limit of 9.76 lbs./hr. and the potential emission of PM from all 50 units is 4.96 lbs/hr. This is about one-half the limit for PM. The margin for compliance would be much greater if the welding units were looked at individually. Therefore, since it is believed the emissions are really in all practicability fugitive and yet easily with in the realm of compliance; it was not considered necessary to list 10 CSR 10-6.400 as an operating permit condition for the welding units.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, does not apply to the general ventilation system of the building which contains welding fumes and VOC emissions from solvents and paints that may enter the building ventilation system. Visible emissions from the building's air ventilation system are expected to be insignificant, and well below the 20% opacity amount allowed by regulation. No monitoring or record keeping was considered necessary.

Periodic monitoring of the paint booth exhaust for visible emissions using procedures of Method 22 was included in the permit. The installation uses filters to control particulate emissions from the paint booth. Periodic inspections of the control equipment exhaust for visible emissions are required to assure the effectiveness of the equipment. Spare filters must also be retained for this control device. For reasons mentioned above, periodic Method 9 monitoring to demonstrate compliance with the opacity limit was not considered necessary.

10 CSR 10-6.065 (3)(E)(1.) *Exempt Emission Units*

All of the heating sources, individually, emit only combustion products; less than one hundred fifty (150) pounds per day of any air contaminant and are sources with a capacity of less than ten million BTU per hour (10 MMBTU/hr) that burn only natural gas. 10 CSR 10-6.065(3)(E)1., *Exempt Emission Units*, exempts these sources from the operating permit rule and therefore were not listed as emission units with applicable regulations. In addition, the Air Pollution Control Program has determined the combustion of natural gas would not exceed the limits contained in this regulation.

**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:



Richard J. Campbell P.E.  
Environmental Engineer