

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

## PART 70 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 herein.

**Operating Permit Number:** OP2017-085  
**Expiration Date:** NOV 29 2022  
**Installation ID:** 095-0191  
**Project Number:** 2012-11-056

**Installation Name and Address**

Aero Transportation Products, Inc.  
3300 East Geospace Drive  
Independence, MO 64051  
Jackson County

**Parent Company's Name and Address**

Wabtec Corporation  
1001 Air Brake Avenue  
Wilmerding PA, 15148

**Installation Description:**

Aero Transportation Products, Inc. manufactures hatch covers and components for railcars at its installation in Independence, Missouri. The facility is a major source of volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs). This facility is not found on the List of named Installations, 10 CSR 10-6.020(3)(B), therefore fugitive emissions are not included in the calculations for the Potential to Emit (PTE).

Prepared by  
Kasia Wasescha  
Operating Permit Unit

Director or Designee  
Department of Natural Resources

NOV 29 2017

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

#### Hatch Cover Lamination Manufacturing Process

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
HP-1	Mold Preparation and Creation – Production of FRP molds
HP-2	Gelcoat Process
HP-3	Gelcoat Exotherm and Cure (Infrared Oven)
HP-4	Impregnate Glass with Resin
HP-5A	Finish Roll, Apply Ribs/Reinforcement
HP-5B	Resin Exotherm and Cure (Infrared Oven)
HP-6	Interior Gelcoat
HP-7	Interior Gelcoat Exotherm and Cure

#### Miscellaneous Parts Lamination Manufacturing Process (Inactive)

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
MP-1	Resin and Gelcoat Application and Cure
MP-2	Gelcoat Process
MP-3	Gelcoat Exotherm and Cure
MP-4	Apply Resin, Load Glass
MP-5	Finish Roll and Resin Exotherm and Cure
MP-6	Interior Gelcoat
MP-7	Interior Gelcoat Exotherm and Cure

#### Solvent Storage

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
ST-1	Styrene Storage Tank – 7,000 gallons

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
HP-3	Infrared Oven, Propane Fueled, 0.124 mmBtu/hr
HP-5	Infrared Oven, Propane Fueled, 0.124 mmBtu/hr

#### Adhesive Bonding of Gasket

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
SP-1	Adhesive Bonding of Gasket to Rail Car Parts
SP-2	Adhesive Bonding of Gasket to Rail Car Parts

#### Solvent Cleaning

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
SP-3	Solvent Wipe Down Process

## 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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

### **PERMIT CONDITION PW001**

10 CSR 10-6.060 Construction Permits Required and/or  
Construction Permit 092007-010, Issued September 21, 2007

#### **Emission Limitations:**

- 1) Special Condition 2A: The permittee shall emit less than 250 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

#### **Operational Limitation:**

- 1) Special Condition 3: The permittee shall keep all inks, solvents, cleaning materials and coating in sealed containers or tanks whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read permanent markings on all ink, solvent, cleaning material and coating containers.

#### **Monitoring/Recordkeeping:**

- 1) The permittee shall calculate the monthly and rolling 12-month VOC emissions from the entire installation using Attachment A or an equivalent form approved by the Air Pollution Control Program.
- 2) The permittee shall retain a complete set of Safety Data Sheets (SDS) for all materials utilized at the facility.
- 3) The permittee shall keep all records either written or electronic form and for no less than five years.
- 4) The permittee shall make all records available immediately to Missouri Department of Natural Resources' personnel upon request.

#### **Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the VOC emission limitation.
- 2) The permittee shall report any deviations from the emission limitations, operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V 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.

**PERMIT CONDITION 001**  
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations and/or  
 40 CFR Part 63, Subpart WWWW National Emissions Standards for Hazardous Air Pollutants:  
 Reinforced Plastic Composites Production

Emission Unit	Description
HP-1	Mold Preparation and Creation - Production of FRP molds
HP-2	Gelcoat Process
HP-3	Gelcoat Exotherm and Cure (Infrared Oven)
HP-4	Impregnate Glass with Resin
HP-5A	Finish Roll, Apply Ribs/Reinforcement
HP-5B	Resin Exotherm and Cure (Infrared Oven)
HP-6	Interior Gelcoat
HP-7	Interior Gelcoat Exotherm and Cure
MP-1	Resin and Gelcoat Application and Cure
MP-2	Gelcoat Process
MP-3	Gelcoat Exotherm and Cure
MP-4	Apply Resin, Load Glass
MP-5	Finish Roll and Resin Exotherm and Cure
MP-6	Interior Gelcoat
MP-7	Interior Gelcoat Exotherm and Cure
ST-1	Styrene Storage Tank – 7,000 gallons

**Emission Limitations:**

For the following operations, the permittee shall meet the following organic hazardous air pollutant (HAP) emission limits: [§63.5805(b); 40 CFR 63 Subpart WWWW, Table 3]

Emission Unit	Operation	Organic HAP Limit
HP-1	Mold Creation (tooling resin, manual application)	157 lb/ton
	Mold Creation (tooling gel coat, atomized spray)	440 lb/ton
HP-2, HP-6	Gel Coat Booth (white/off-white gel coat, atomized spray)	267 lb/ton
HP-4	Impregnator Operation (resin, mechanical application)	88 lb/ton
HP-5A	Hand Finishing (resin, manual application)	87 lb/ton

**Work Practice Standards:**

For the following operations, the permittee shall meet the following work practice standards: [§63.5805(b)]

- 1) Cleaning operations - the permittee shall not use cleaning solvents that contain HAP, except that organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. [40 CFR 63 Subpart

WWWW, Table 4] (Exception: Mold stripping and cleaning are specifically excluded from any requirements in 40 CFR Part 63 Subpart WWWW. [§63.5790(c)])

- 2) HAP-containing materials storage operations-the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. [40 CFR 63 Subpart WWWW, Table 4]

**Method of Compliance:**

**NOTE:** The permittee has chosen to comply with the above emission limitations using the methods described in §63.5810(a), demonstrating that an individual resin or gel coat as applied meets the applicable emission limit in Table 3. This demonstration is done without the use of add-on controls or other emission reduction techniques. The remaining requirements described below are based upon this method of compliance. Should the permittee choose to change the method of compliance, alternative requirements from 40 CFR Part 63 Subpart WWWW would apply and the permittee shall submit a significant modification to this Part 70 operating permit to include the alternative MACT WWWW requirements.

The permittee shall demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in 40 CFR 63 Subpart WWWW, Table 3.

- 1) Calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operation types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee must calculate organic HAP emission factors for each different process stream by using the appropriate equations in 40 CFR 63 Subpart WWWW, Table 1 as listed below for open molding or site-specific organic HAP emission factors discussed in §63.5796. [§63.5810(a)(1)]

Emission Unit	Operation	Source	Equation
HP-1	Mold Creation (tooling gel coat, atomized spray)	1(f); ≥ 33% HAP	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000$
	Mold Creation (tooling resin, manual application)	1(a)(i); ≥ 33% HAP	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000$
HP-2, HP-6	Gel Coat Booth (white/off-white gel coat, atomized spray)	1(f); < 33% HAP	$EF = 0.445 \times \%HAP \times 2000$
HP-4	Impregnator Operation (resin, mechanical application)	1(c)(i); < 33% HAP	$EF = 0.107 \times \%HAP \times 2000$
HP-5A	Hand Finishing (resin, manual application)	1(a)(i); < 33% HAP	$EF = 0.126 \times \%HAP \times 2000$

- 2) If the calculated emission factor is less than or equal to the appropriate emission limit, the permittee has demonstrated that this process stream complies with the emission limit in 40 CFR 63 Subpart WWWW, Table 3. [§63.5810(a)(2)]

**Monitoring/Demonstration of Compliance:**

- 1) The permittee must be in compliance at all times with the work practice standards in 40 CFR 63 Subpart WWWW, Table 4, as well as the organic HAP emissions limits in 40 CFR 63 Subpart WWWW, Table 3, as applicable, that the permittee is meeting without the use of add-on controls. [§63.5835(a)]
- 2) The permittee must retain the records of resin and gel coat organic HAP content, and must include the list of these resins and gel coats and identify their application methods in the semi-annual compliance reports. If, after the permittee has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the permittee changes the application method or controls; then the permittee again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in 40 CFR 63 Subpart WWWW, Table 3, the permittee must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a twelve-month rolling average. [§63.5895(d)]
- 3) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in 40 CFR 63 Subpart WWWW, Table 3, on a twelve-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(2)]
- 4) Compliance with the work practice standards in 40 CFR 63 Subpart WWWW, Table 4, is demonstrated by performing the work practice required for the permittee's operation. [§63.5900(a)(4)]
- 5) The permittee must report each deviation from each standard in §63.5805 that applies to the facility. The deviations must be reported according to the requirements in §63.5910. [§63.5900(b)]

**Recordkeeping:**

- 1) The permittee shall keep a copy of each notification and report that was submitted to comply with 40 CFR Part 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.5915(a)(1)]
- 2) The permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors for operations listed in 40 CFR 63 Subpart WWWW, Table 3. [§63.5915(c)]
- 3) The permittee must keep a certified statement that the facility is in compliance with the work practice requirements in 40 CFR 63 Subpart WWWW, Table 4, as applicable. [§63.5915(d)]
- 4) The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]
- 5) As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]
- 6) The permittee must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 63.10(b)(1). The permittee can keep the records off-site for the remaining three years. [§63.5920(c)]
- 7) The permittee may keep records in hard copy or computer readable form including, but not limited to: paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

**Reporting:**

- 1) The permittee must submit a semi-annual compliance report as described in 40 CFR 63 Subpart WWW, Table 14. The compliance report must contain: [§63.5910(a)]
  - a) A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations that apply and there were no deviations from the requirements for work practice standards in 40 CFR 63 Subpart WWW, Table 14 that apply. [40 CFR 63 Subpart WWW, Table 14-1.a.]
  - b) The information in §63.5910(d) if the facility has a deviation from any emission limitation during the reporting period. [40 CFR 63 Subpart WWW, Table 14 - 1 .b.]
- 2) Unless the administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the date specified in 40 CFR 63 Subpart WWW, Table 14, and according to §63.5910(b)(1) through (5). [§63.5910(b)]
  - a) Each compliance report must cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.5910(b)(3)]
  - b) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.5910(b)(4)]
  - c) The permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established for submitting semi-annual reports pursuant to §70.6(a)(3)(iii)(A), instead of according to the dates in §63.5910(b)(1) through (4). [§63.5910(b)(5)]
- 3) The compliance report must contain the following information:
  - a) Company name and address. [§63.5910(c)(1)]
  - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
  - c) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
  - d) If there are no deviations from any organic HAP emissions limitations that apply, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]
- 4) For each deviation from an organic HAP emissions limitation and for each deviation from the requirements for work practice standards that occurs at an affected source where the facility is not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in §63.5910(c)(1) through (3) and in §63.5910(d)(1) and (2). [§63.5910(d)]
  - a) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]
  - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]
- 5) Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 must report all deviations as defined in this subpart in the semi-annual monitoring report required by §70.6(a)(3)(iii)(A). If the permittee submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semi-annual monitoring report required by §70.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a compliance report shall not otherwise affect any



obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.5910(g)]

- 6) Where multiple compliance options are available, the permittee must state in the next compliance report if the facility has changed compliance options since the last compliance report. [§63.5910(i)]
- 7) All compliance reports and semi-annual monitoring reports shall be sent to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102 or emailed to [aircompliancereporting@dnr.mo.gov](mailto:aircompliancereporting@dnr.mo.gov).

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

### **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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

#### **10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos**

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.

#### **10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) 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.

#### **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 10-6.165 Restriction of Emission of Odors**

**This requirement is a State Only permit requirement.**

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 odor evaluation shall be taken at a location outside of the installation's property boundary.

**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. All tests shall be performed by qualified personnel.
- 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

**This requirement is a State Only permit requirement.**

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.

**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 at an installation:
  - 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.

<b>40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)</b>
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- 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 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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.

- 5) 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.*

## 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(6)(C)1.B Permit Duration**

### **10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits**

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### **10 CSR 10-6.065(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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. 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.A 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 semiannual 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(6)(C)1.D Risk Management Plan Under Section 112(r)**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.



**10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

**10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None

**10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(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(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement

Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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.
  - 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; and
  - d) The permit shield shall not apply to these changes.

**10 CSR 10-6.020(2)(R)34 Responsible Official**

The application utilized in the preparation of this permit was signed by Mr. Paul T. Lyon. On March 13, 2017, the Air Pollution Control Program was informed that Mr. Philip D. Reusch is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause**

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MoDNR 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the 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 A**  
 Plant-Wide VOC Voluntary Emissions Limit

VOC Containing Material (Name, Type)	Monthly Usage (tons)	VOC Content <sup>1</sup> (percent)	VOC Emissions <sup>2</sup> (tons)
VOC Emission Source	Monthly Usage (1000 gallons)	VOC Emission Factor <sup>3,4,5</sup> (lb/1000 gallons)	VOC Emissions <sup>3</sup> (tons)
Propane Combustion		0.47	
Styrene Storage Tank - Breathing Loss Styrene 100-42-5			
Styrene Storage Tank - Working Loss Styrene 100-42-5			
<b>Monthly VOC Emissions (ton/month):</b>			

<sup>1</sup>VOC Content percent from the most recent Safety Data Sheet (SDS), if there is a range of values, the highest value must be used for the calculation.

<sup>2</sup>VOC Emissions (tons) = Monthly Usage (tons) x VOC Content (percent)

<sup>3</sup>The VOC Emission Factor for propane was obtained from WEBFIRE for Process SCC 10301002.

<sup>4</sup>VOC Emissions (tons) = Monthly Usage (MMscf) x VOC Emission Factor (lb/MMscf) x 0.0005 (ton/lb).

<sup>5</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 or mass balance for the chemical stored/used.

Date (Month/Year)	12-Month Rolling VOC Emissions <sup>6</sup> (ton/yr)

<sup>6</sup>12-Month Rolling VOC Emissions (ton/yr) = The sum of the most recent 12 Monthly VOC Emissions (ton/month). **12-Month Rolling VOC Emissions of less than 250 tons demonstrates compliance.**

**Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Program's Compliance/Enforcement section during the most recent 12-month period must be included in the rolling total.**

## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

Aero Transportation Products, Inc. manufactures hatch covers and components for railcars and other fiberglass components at the facility in Independence, Missouri. The facility is a major source of volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs). This facility is not found on the List of named Installations, 10 CSR 10-6.020(3)(B), therefore fugitive emissions are not included in the calculations for the Potential to Emit (PTE). Facility operations are conducted in a former underground limestone mine with two stacks exhausting processing areas to the atmosphere. Styrene, a HAP and VOC, is the primary pollutant emitted in the process. Toluene, Cyclohexane and Hexane are also emitted in smaller amounts.

The manufacturing process consists of a mold of the hatch cover which is first sprayed with a polyester gel coat and allowed to cure. Then chopped strand mat and structural woven glass saturated with resin are applied to the mold shape. After the layers are applied, any entrapped air is removed from the laminate by rolling. The laminate is then allowed to cure, after which it is removed from the mold, trimmed, fitted with the appropriate hardware (hinges, latches, etc.) and then shipped to the clients.

### Updated Potential to Emit and Reported Air Pollutant Emissions, tons per year

Pollutants	Potential to Emit <sup>1</sup>	2016	2015	2014	2013	2012
Volatile Organic Compounds (VOC)	< 250	74.19	61.70	53.28	41.95	43.14
Hazardous Air Pollutants <sup>2</sup> (HAPs)	> 10/25	--	--	--	--	--

<sup>1</sup>Potential emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- The installation is limited by Permit Condition PW001 to:
  - Less than 250 tons of VOC emissions from the entire installation during any consecutive 12 month period.

<sup>2</sup>The installation does emit HAPS; however, the installation reports their HAP emissions as VOCs or PM<sub>10</sub> as explained in 10 CSR 10-6.110 - *Reporting Emission Data, Emission Fees, and Process Information*.

### 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) Part 70 Operating Permit Application, received November 20, 2012;
- 2) 2016 Emissions Inventory Questionnaire, received April 20, 2017; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit 092007-010, Issued September 24, 2007

### 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 the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-2.210 – *Control of Emissions From Solvent Metal Cleaning* is not applicable to the installation as the installation only uses acetone for the solvent wipe down process.

10 CSR 10-2.215 – *Control of Emissions from Solvent Cleanup Operations* is not applicable to the installation as the installation only uses acetone for the solvent cleanup operations.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.170 - *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is not applicable to the installation as they do not have the potential to emit particulate matter or opacity.

10 CSR 10-6.220 - *Restriction of Emission of Visible Air Contaminants* is not applicable to the installation as they do not have the potential to emit particulate matter or opacity.

### **Construction Permit History**

The following construction permits have been issued for this installation:

Construction Permit 0889-007, Issued August 16, 1989

Construction Permit 0198-010, Issued January 9, 1998

Construction Permit 0198-010A, Issued June 10, 1998

- ♦ All of these construction permits were superseded by Construction Permit 092007-010, Issued September 24, 2007.

Construction Permit 092007-010, Issued September 24, 2007

- ♦ This De\_minimis construction permit was for an increase in production. All special conditions have been incorporated into the permit and can be found in Permit Condition PW001.

### **New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60, Subpart Kb *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, This rule is not applicable to the installation as the styrene storage tank is less than 19,000 gallons. [§60.110b(a)]

40 CFR Part 60, Subpart VVV – *Standard of Performance for Polymeric Coating of Supporting Substrates Facilities* is not applicable to the installation and has not been applied within this permit. The installation does not perform polymeric coating of supporting substrates as defined within §60.741(a). [§60.740(a)]

### **Maximum Achievable Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart NNN – *National Emission Standards for Hazardous Air Pollutants for Wool Fiberglass Manufacturing* is not applicable to the installation and has not been applied within this

permit. The installation does not meet the definition of wool fiberglass manufacturing facility within §63.1381. [§63.1380(a)]

40 CFR Part 63, Subpart HHHH – *National Emission Standards for Hazardous Air Pollutants for Wet Formed Fiberglass Mat Production* is not applicable to the installation and has not been applied within this permit. The installation does not meet the definition of Wet Formed Fiberglass Mat Production.

40 CFR Part 63, Subpart WWWW – *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production* is applicable to emission processes at the installation and has been applied within this permit (see Permit Condition 001). The installation meets the applicability criteria within §63.5785 as the installation is a major source of HAPs and the installation molds plastics using resins and gel coats containing styrene (110-42-5). SP-1 and SP-2 are exempt from this subpart per §63.5790(c). This subpart is not applicable to SP-3 because it only uses acetone - which is not considered a HAP.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to emission processes at the installation as the facility does not have any emission units that meet the definition in §63.7575 of boilers or process heaters.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None

#### **Compliance Assurance Monitoring (CAM) Applicability**

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

#### **Greenhouse Gas Emissions**

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> emissions were not included within this permit. The applicant may be required to report the data directly to EPA. The public may obtain CO<sub>2</sub> emissions data for this installation by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

#### **Other Regulatory Determinations**

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* This rule replaced 10 CSR 10-2.040 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*. This rule is applicable to the



installation, however the facility has two infrared ovens fueled by propane, which are considered to be in compliance per 10 CSR 10-6.405(1)(C).

**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 APCP'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).

## Response to Public Comments

Comments were received by Leslye E. Werner from EPA Region 7 on October 10, 2017. The comments are addressed in the order in which they appear within the letter.

### **EPA Public Comment #1:**

Permit Condition 001 incorporates the Maximum Achievable Control Technology (MACT) Regulation from 40 CFR Part 63, Subpart *WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production* which is indicated to be applicable to eighteen (18) separately identified Aero Transportation emission units. Permit Condition 001 also specifies six (6) separate emission limitations, for specific operations, as detailed in Table 3 of Subpart *WWWW* of 40 CFR Part 63. However, Permit Condition 001 provides no indication as to which of Aero Transportation Products, Inc. emission unit(s) are subject to each of the specific emission limitations.

### **MoDNR Response to Comment #1:**

Permit Condition 001 has been updated with a table that shows which HAP limit applies to what emission unit. It should also be noted that the Gel Coat (all other pigmented coating, atomized spray) emission limit has been removed from the permit. The installation used to use different colors of gelcoat but now only offer one color of gelcoat associated with the Gel Coat Booth (white/off-white gel coat, atomized spray) since 2004. It should also be noted that all MP emission units listed in Permit Condition 001 are currently inactive; they were previously associated with a removed (approximately 1996 or 1997) Miscellaneous Parts Operation (production line). The permittee wishes to keep the MP units as inactive rather than dismantle them for the flexibility to potentially use the equipment in the future if they add a new production line. Because they are not currently used and it is unknown what they might be used for, no HAP limits were applied to them. If they were to become active again they may become subject to one of the HAP limits in Table 3 of 40 CFR Part 60, Subpart *WWWW*; this would require an amendment to the permittee's operating permit. An amendment would appropriately apply any applicable HAP limits to the MP units. Please also note that during the review of this public comment it was determined that 40 CFR 63 Subpart *WWWW* is not applicable to SP-1, SP-2, and SP-3. See the Statement of Basis for details.

### **EPA Public Comment #2:**

The Method of Compliance section, detailed in Permit Condition 001, requires the permittee to demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit by calculating the actual organic HAP (hazardous air pollutant) emission factor for each different process stream within each operation type by using one of the eighteen (18) listed equations found in Table 1 of 40 CFR Part 63, Subpart *WWWW*. Again, Permit Condition 001 provides no indication as to which of the 18 equations applies to which of the 18 emission units to verify compliance to which of the 6 emission factors. Therefore, it would appear to EPA that Permit Condition 001 is not enforceable as a practical matter. EPA strongly encourages MDNR consider providing clear indication as to which emission unit(s) are subject to which emission limitation and specify the Table 1 equations to be used to verify compliance.

### **MoDNR Response to Comment #2:**

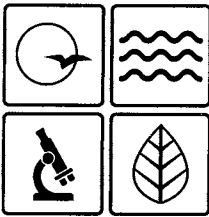
Permit Condition 001 has been updated with a table that shows which equation is to be used for what emission unit.

**EPA Public Comment #3:**

Section IV: *Core Permit Requirements* includes 10 CSR 10-6.250: *Asbestos Abatement Projects-Certification, Accreditation, and Business Exemption Requirements* incorporating the Asbestos Hazard Emergency Response Act (AHERA) and its regulations for school districts and personnel working on asbestos activities in schools. The associated with 10 CSR 10-6.250 have not been adopted into the EPA approved Missouri State Implementation Plan (SIP) and is therefore a "State Only Requirement," and EPA recommends MDNR consider adding a "State Only Requirement" designation to 10 CSR 10-6.250.

**MoDNR Response to Comment #3:**

The draft has been updated to include the "State Only Requirement" designation.



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

NOV 29 2017

Mr. Philip D. Reusch  
Aero Transportation Products, Inc.  
PO Box 1058  
Independence, MO 64051

Re: Aero Transportation Products, Inc., 095-0191  
Permit Number: OP2017-085

Dear Mr. Reusch:

Enclosed with this letter is your Part 70 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 that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kwj

Enclosures

c: PAMS File: 2012-11-056



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