



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: OP2013-071
Expiration Date: NOV 05 2018
Installation ID: 145-0063
Project Number: 2011-10-043

Installation Name and Address

Aluminum Finishers, LLC
298 East Cedar Street
Granby, MO 64844
Newton County

Parent Company's Name and Address

Aluminum Finishers, LLC
P.O. Box 519
Monett, MO 65708

Installation Description:

Aluminum Finishers, LLC manufactures prefabricated metal storefronts in Granby, Missouri. The installation finishes purchased aluminum by either wet painting or powder coating. The installation is a major source of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

NOV 06 2013

Effective Date

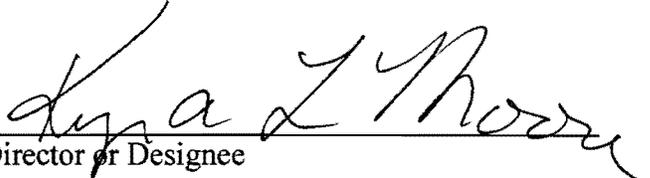

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Aluminum Finishers, LLC applies coatings to architectural subsections which are required to meet the specifications of Architectural Aluminum Manufacturers Association Publication No. AAMA 605.2-2000. They are a high performance architectural coating manufacturer that uses aluminum extrusions to make prefabricated metal storefronts.

EP-01 is the eight station painting spray booth area which consists of a total of eight stacks, S1 through S8, where a combination of three coats of primer and paint are applied. This work area has the option to apply powder coating. Aluminum extrusions enter the paint booth area consisting of eight booths. The extrusions proceed through the booths and the coatings are applied. When utilized for wet painting the first two booths apply the primer or base coat, and the following booths apply the remaining color or clear coats. When utilized for powder coating, all of the booths can apply powder coating. The extrusions then proceed to the drying oven for final curing, to the coating manufacture's specifications, of the applied coatings.

An electrostatic paint system is utilized to minimize overspray. A percent transfer efficiency is used for the spray guns. A paint arrestor filter is given a value of 90 percent for control of particulate matter.

Powder coating systems capture and recirculate overspray material and therefore, are considered in terms of a "utilization rate" rather than a transfer efficiency. Most facilities achieve a powder utilization rate of 90 to 95 percent. This facility was assigned a conservative value of 90 percent. This implies that ten percent of the powder reports to the control filter. Also, the paint arrestor filter was assigned 90 percent for control of particulate matter and would apply when the powder coating is being utilized. Although powders are essentially 100 percent solids, they may produce small quantities of organic materials which may be released during the curing process. Up to five weight percent VOC can be released from powders during the curing process. Most powder overspray can be reclaimed and reused; however some reclaimed overspray must be reprocessed because it may contain larger and heavier granules that are not acceptable for reuse. The five percent VOC content was used in the calculation of the Potential to Emit (PTE) for the powder coating operation. Powder coating cannot occur while wet painting is being done in the same station of the booth. Therefore, the PTE of the installation utilizes the worst case pollutant from the worst case operation.

The eight individual work station booths can either wet spray or use powder coating but cannot operate both at the same time in the same station. Some of the eight stations could be powder coating and other stations wet spraying. When coated, the extrusions are then sent for an oven pass. The natural gas fired drying oven EP-02 has two burners rated at 1.5 MMBtu/hr each. The oven is exhausted through stack S9. The oven with a conveyor inside is 120 feet long and the conveyor passes through it at a maximum rate of ten ft/min to allow the proper cure time for the coating by the coating supplier. The curing time can be varied by slowing the speed of the belt. The oven is fired by natural gas and is designed to operate within the 400 to 500°F range.

A 0.1 mile paved haul road at the site is used to deliver materials and ship product. The emissions from this road were not included in the installation's PTE.

The installation is a major source of VOC and HAP.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2012	2011	2010	2009	2008
Particulate Matter \leq Ten Microns (PM ₁₀)	-	-	-	-	-
Sulfur Oxides (SO _x)	-	-	-	-	-
Nitrogen Oxides (NO _x)	-	-	-	-	-
Volatile Organic Compounds (VOC)	-	-	-	-	-
Carbon Monoxide (CO)	-	-	-	-	-
Hazardous Air Pollutants (HAP)	-	-	-	-	-

As a new installation, Aluminum Finishers, LLC is not required to submit an EIQ until after their first full year of operation. The installation began operating in late 2012 and will submit their first EIQ for the 2013 calendar year.

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.

Emission Unit	Description
EP-01	Eight-station Paint Booth
EU0003	Paved Haul Road – 0.1 miles

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit	Description
EP-02	Drying Oven - Two 1.5 MMBtu/hr natural gas fired burners
-	Nine 8,127 gallon aluminum pre-treatment tanks

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 10-6.060 Construction Permits Required
Construction Permit 102010-001, Issued October 5, 2010

Emission Limitation:

Special Condition 1.A: The permittee shall emit less than 250.0 tons of VOC from EP-01 Eight-station Paint Booth and EP-02 Drying Oven in any consecutive 12-month period.

Operational Limitation:

Special Condition 4: The permittee shall keep all thinners, paints, solvents, cleaning solutions, and other chemicals in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on the containers.

Monitoring/Recordkeeping:

1. Special Condition 1.B: Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the 250.0 tpy VOC emission limitation. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.
2. Records may be maintained in paper or electronic format.

Reporting:

1. Special Condition 1.C: The permittee shall report to the Air Pollution Control Program's 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 250.0 tpy VOC emission limitation.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 102010-001, Issued October 5, 2010

Emission Limitation:

Special Condition 2.A: The permittee shall emit less than 15.0 tons of PM₁₀ from EP-01 Eight-station Paint Booth, EP-02 Drying Oven, and EU0003 Paved Haul Road in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. Special Condition 2.B: Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the 15.0 tpy PM₁₀ emission limitation. The

permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

2. Records may be maintained in paper or electronic format.

Reporting:

1. Special Condition 2.C: The permittee shall report to the Air Pollution Control Program's 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 15.0 tpy PM₁₀ emission limitation.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications 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 CFR and 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 10-6.060 Construction Permits Required Construction Permit 102010-001, Issued October 5, 2010 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-01	Eight-station Paint Booth

Emission Limitations:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20 percent.
 - a) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Operational Limitation:

Special Condition 3.A: The permittee shall control emissions from EP-01 Eight-station Paint Booth using a paint arrestor filter. The paint arrestor filter shall be operated and maintained in accordance with the manufacturer's specifications. The filter shall be equipped with a gauge or meter, which indicates the pressure drop across the filter. The gauge or meter shall be located such that Department of Natural Resources' employees may easily observe them. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring/Recordkeeping:

1. Special Condition 3.B: The permittee shall monitor and record the operating pressure drop across the filter at least once every 24 hours while EP-01 is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
2. The permittee shall maintain a copy of the manufacturer's specification onsite.
3. Special Condition 3.C: The permittee shall maintain an operating and maintenance log for the filter which using Attachment C or an equivalent form approved by the Air Pollution Control Program which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4. Records may be maintained in paper or electronic format.

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.

PERMIT CONDITION 002 10 CSR 10-6.060 Construction Permits Required Construction Permit 102010-001, Issued October 5, 2010	
Emission Unit	Description
EU0003	Paved Haul Road – 0.1 miles

Operational Limitation:

1. Special Condition 5: The permittee shall control fugitive emissions from EU0003 Paved Haul Road by paving and washing/cleaning.
 - a) The permittee shall pave the road with materials such as asphalt, concrete, and/or other material(s). To use materials other than asphalt or concrete, the permittee shall first obtain approval from the Air Pollution Control Program. The pavement shall be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the installation is operating.
 - b) Maintenance and/or repair of the road surface shall be conducted as necessary to ensure the physical integrity of the pavement is adequate to achieve control of fugitive emissions while the installation is operating.

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.

PERMIT CONDITION 003 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart MMMM – National Emission Standards for HAP for Surface Coating of Miscellaneous Metal Parts and Products	
Emission Unit	Description
EP-01	Eight-station Paint Booth

Emission Limitation:

1. The permittee shall limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in §63.3890(a)(2) determined according to the requirements in §63.3941, §63.3951, or §63.3961. [§63.3890(a)]
 - a) For each new high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period. [§63.3890(a)(2)]

Compliance Options:

1. The permittee shall include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.3890. To make this determination, the permittee shall use at least one of the three compliance options listed in §63.3891(a) through (c). The permittee may apply any of the compliance options to the entire affected source. The permittee may use different compliance options at different times. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is

2. applied to different parts. However, the permittee may not use different compliance options at the same time. If the permittee switches between compliance options, the permittee shall document this switch as required by §63.3930(c), and the permittee report it in the next semi-annual compliance report required in §63.3920. [§63.3891]
 - a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee shall meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option. [§63.3891(a)]
 - b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation, the organic HAP emission rate for the coating operation is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee shall meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. [§63.3891(b)]
 - c) *Emission rate with add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation, and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. If the permittee uses this compliance option, the permittee shall also demonstrate that all emission capture systems and add-on control devices for the coating operation meet the operating limits required in §63.3892, except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to §63.3961(j), and that the permittee meets the work practice standards required in §63.3893. The permittee shall meet all the requirements of §§63.3960 through 63.3968 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option. [§63.3891(c)]

Compliant Material Option

Operational Limitation:

The permittee is not required to meet any operating limits. [§63.3892(a)]

Work Practice Standards:

The permittee is not required to meet any work practice standards. [§63.3893(a)]

General Compliance Requirements:

1. The permittee shall be in compliance with the emission limitations in 40 CFR Part 63, Subpart MMMM as follows: [§63.3900(a)]
 - a) The permittee shall be in compliance with the applicable emission limit in §63.3890 at all times. [§63.3900(a)(1)]
2. The permittee shall always operate and maintain the affected source according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]

General Provisions:

The permittee shall refer to Table 2 to 40 CFR Part 63, Subpart MMMM for 40 CFR Part 63, Subpart A applicability.

Notifications:

1. The permittee shall submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in §63.3910(b) and (c). [§63.3910(a)]
2. *Initial Notification.* The permittee shall submit the initial notification required by §63.9(b) for a new affected source no later than 120 days after initial startup. [§63.3910(b)]
3. *Notification of compliance status.* The permittee shall submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.3940. The notification of compliance status shall contain the information specified in §63.3910(c)(1) through (11) and in §63.9(h). [§63.3910(c)]
 - a) Company name and address. [§63.3910(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. [§63.3910(c)(2)]
 - c) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.3940. [§63.3910(c)(3)]
 - d) Identification of the compliance option or options specified in §63.3891 that the permittee used on each coating operation in the affected source during the initial compliance period. [§63.3910(c)(4)]
 - e) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period. [§63.3910(c)(5)]
 - f) If a deviation occurred, include the following information: [§63.3910(c)(6)]
 - i) A description and statement of the cause of the deviation. [§63.3910(c)(6)(i)]
 - ii) If the permittee failed to meet the applicable emission limit in §63.3890, include all the calculations used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. The permittee does not need to submit information provided by the materials' suppliers or manufacturers, or test reports. [§63.3910(c)(6)(ii)]
 - g) For each of the data items listed in §63.3910(c)(7)(i) through (iv) that is required by the compliance option(s) the permittee used to demonstrate compliance with the emission limit, include an example of how the permittee determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). The permittee does not need to submit copies of any test reports. [§63.3910(c)(7)]
 - i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material. [§63.3910(c)(7)(i)]
 - ii) Volume fraction of coating solids for one coating. [§63.3910(c)(7)(ii)]
 - iii) Density for one coating, one thinner and/or other additive, and one leaning material, except that if the permittee uses the compliant material option, only the example coating density is required. [§63.3910(c)(7)(iii)]
 - iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which the permittee is claiming an allowance in Equation 1 of §63.3951. [§63.3910(c)(7)(iv)]
 - h) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) the permittee used, specified as follows: [§63.3910(c)(8)]
 - i) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of §63.3941. [§63.3910(c)(8)(i)]

Reporting:

1. *Semi-annual compliance reports.* The permittee shall submit semi-annual compliance reports for each affected source according to the requirements of §63.3920(a)(1) through (7). The semi-annual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in §63.3920(a)(2). [§63.3920(a)]
 - a) *Dates.* Unless the Director has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee shall prepare and submit each semi-annual compliance report according to the dates specified in §63.3920(a)(1)(i) through (iv). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(1)]
 - i) The first semi-annual compliance report shall cover the first semi-annual reporting period which begins the day after the end of the initial compliance period described in §63.3940 and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period. [§63.3920(a)(1)(i)]
 - ii) Each subsequent semi-annual compliance report shall cover the subsequent semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.3920(a)(1)(ii)]
 - iii) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70, and if the permitting authority has established dates for submitting semi-annual reports pursuant to §70.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in §63.3920(a)(1)(iii). [§63.3920(a)(1)(iv)]
 - b) *Inclusion with Title V report.* Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 shall report all deviations as defined in 40 CFR Part 63, Subpart MMMM in the semi-annual monitoring report required by §70.6(a)(3)(iii)(A). If an affected source submits a semi-annual compliance report pursuant to §63.3920 along with, or as part of, the semi-annual monitoring report required by §70.6(a)(3)(iii)(A), and the semi-annual compliance report includes all required information concerning deviations from any emission limitation in 40 CFR Part 63, Subpart MMMM, its submission will be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a semi-annual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]
 - c) *General requirements.* The semi-annual compliance report shall contain the information specified in §63.3920(a)(3)(i) through (vii), and the information specified in §63.3920(a)(4) through (7) and (c)(1) that is applicable. [§63.3920(a)(3)]
 - i) Company name and address. [§63.3920(a)(3)(i)]
 - ii) 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. [§63.3920(a)(3)(ii)]
 - iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30 or December 31. Note that the information reported for each of the six months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
 - iv) Identification of the compliance option or options specified in §63.3891 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option the permittee used. [§63.3920(a)(3)(iv)]

- d) *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply, the semi-annual compliance report shall include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
 - e) *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semi-annual compliance report shall contain the following information: [§63.3920(a)(5)]
 - i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [§63.3920(a)(5)(i)]
 - ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports). [§63.3920(a)(5)(ii)]
 - iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports). [§63.3920(a)(5)(iii)]
 - iv) A statement of the cause of each deviation. [§63.3920(a)(5)(iv)]
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.

Recordkeeping:

1. The permittee shall collect and keep records of the data and information specified in §63.3930. Failure to collect and keep these records is a deviation from the applicable standard. [§63.3930]
 - a) A copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart M, and the documentation supporting each notification and report. [§63.3930(a)]
 - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee shall keep a copy of the complete test report. If the permittee used information provided by the manufacturer or supplier of the material that was based on testing, the permittee shall keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
 - c) For each compliance period, the following records: [§63.3930(c)]
 - i) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used. [§63.3930(c)(1)]
 - ii) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941. [§63.3930(c)(2)]
 - d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]

- e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
- f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
- g) The permittee shall keep records of the date, time, and duration of each deviation. [§63.3930(j)]
2. Records shall be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
3. As specified in §63.10(b)(1), the permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
4. The permittee shall 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 may keep the records off-site for the remaining three years. [§63.3931(c)]
5. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Initial Compliance Demonstration Requirements:

1. The permittee shall complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.3941. The initial compliance period begins on date of initial startup and ends on the last day of the 12th month following that date. If the date of initial startup occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.3941 and supporting documentation showing that during the initial compliance period, the permittee used no coating with an organic HAP content that exceeded the applicable emission limit in §63.3890, and that the permittee used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to §63.3941(a). [§63.3940]
2. The permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The permittee shall use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which the permittee does not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations shall use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and shall use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to §63.3941. Any coating operation for which the permittee uses the compliant material option is not required to meet the operating limits or work practice standards required in §§63.3892 and 63.3893, respectively. The permittee shall conduct a separate initial compliance demonstration for each high performance coating operation. The permittee shall meet all the requirements of §63.3941. Use the procedures in §63.3941 on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. The permittee does not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that the permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which the

permittee uses the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. [§63.3941]

- a) *Determine the mass fraction of organic HAP for each material used.* The permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the following options: [§63.3941(a)]
- i) *Method 311 (Appendix A to 40 CFR Part 63).* The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in §63.3941(a)(1)(i) and (ii) when performing a Method 311 test. [§63.3941(a)(1)]
- (1) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the permittee does not have to count it. Express the mass fraction of each organic HAP the permittee counts as a value truncated to four places after the decimal point (e.g., 0.3791). [§63.3941(a)(1)(i)]
- (2) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763). [§63.3941(a)(1)(ii)]
- ii) *Method 24 (Appendix A to 40 CFR Part 60).* For coatings, the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may use the alternative method contained in Appendix A to 40 CFR Part 63, Subpart PPPP, rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in Appendix A to 40 CFR Part 63, Subpart PPPP, as a substitute for the mass fraction of organic HAP. [§63.3941(a)(2)]
- iii) *Alternative method.* The permittee may use an alternative test method for determining the mass fraction of organic HAP once the Director has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(a)(3)]
- iv) *Information from the supplier or manufacturer of the material.* The permittee may rely on information other than that generated by the test methods specified in §63.3941(a)(1) through (3), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the permittee does not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to §63.3941(a)(1) through (3), then the test method results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(4)]
- v) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the permittee may use the

default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to 40 CFR Part 63, Subpart M. If the permittee uses the tables, the permittee shall use the values in Table 3 to 40 CFR Part 63, Subpart M for all solvent blends that match Table 3 to 40 CFR Part 63, Subpart M entries according to the instructions for Table 3 to 40 CFR Part 63, Subpart M, and the permittee may use Table 4 to 40 CFR Part 63, Subpart M only if the solvent blends in the materials used do not match any of the solvent blends in Table 3 to 40 CFR Part 63, Subpart M and the permittee knows only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4 to 40 CFR Part 63, Subpart M, the Method 311 results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(5)]

- b) *Determine the volume fraction of coating solids for each coating.* The permittee shall determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in §63.3941(b)(1) through (4). If test results obtained according to §63.3941(b)(1) do not agree with the information obtained under §63.3941(b)(3) or (4), the test results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(b)]
- i) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).* The permittee may use ASTM Method D2697-86 (Reapproved 1998), “Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings” (incorporated by reference, see §63.14), or ASTM Method D6093-97 (Reapproved 2003), “Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer” (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.3941(b)(1)]
- ii) *Alternative method.* The permittee may use an alternative test method for determining the solids content of each coating once the Director has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(b)(2)]
- iii) *Information from the supplier or manufacturer of the material.* The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.3941(b)(3)]
- iv) *Calculation of volume fraction of coating solids.* The permittee may determine the volume fraction of coating solids using Equation 1 of §63.3941:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where:

V_s = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{\text{volatiles}}$ = Total volatile matter content of the coating, including HAP, VOC, water, and exempt compounds, determined according to Method 24 in Appendix A of 40 CFR Part 60, grams volatile matter per liter coating.

D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or

reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

[§63.3941(b)(4)]

- c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM Method D1475-98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475-98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(c)]
- d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of §63.3941:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

Where:

H_c = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c = Density of coating, kg coating per liter (gal) coating, determined according to §63.3941(c).

W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to §63.3941(a).

V_s = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to §63.3941(b). [§63.3941(d)]

- e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period shall be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period shall contain no organic HAP, determined according to §63.3941(a). The permittee shall keep all records required by §§63.3930 and 63.3931. As part of the notification of compliance status required in §63.3910, the permittee shall identify the coating operation(s) for which the permittee used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and the permittee used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in §63.3941(a). [§63.3941(e)]

Continuous Compliance Demonstration Requirements:

1. For each compliance period to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. [§63.3942(a)]

2. If the permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in §63.3942(a) is a deviation from the emission limitations that shall be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5). [§63.3942(b)]
3. As part of each semi-annual compliance report required by §63.3920, the permittee shall identify the coating operation(s) for which the permittee used the compliant material option. If there were no deviations from the applicable emission limit in §63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and the permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a). [§63.3942(c)]
4. The permittee shall maintain records as specified in §§63.3930 and 63.3931. [§63.3942(d)]

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the CFR, the 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 is only an excerpt from the regulation or code, and is 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. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premise having not more than four dwelling units, provided that the refuse originates on the same premises.
 - b) Yard waste.
3. 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 permittee fails to comply with the conditions or any provisions of the permit.
4. Aluminum Finishers, LLC may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Aluminum Finishers, LLC fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)11, the director shall not issue a permit under 10 CSR 10-6.045 unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Record keeping. 40 CFR Part 60, Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of 40 CFR Part 60, Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with §60.2245 - §60.2260, sources shall conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
6. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A – Test Methods, Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 are incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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 §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 §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 §§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 18 months. [10 CSR 10-

6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(6)(C)3.B]

**10 CSR 10-6.080 Emission Standards for HAP 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.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

1. The permittee shall submit 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. The permittee may be required by the director to file additional reports.
3. 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.
4. 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.
5. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
6. The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
7. The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
8. The permittee shall collect, record, and maintain the information necessary to complete the required forms during each year of operation of the installation.

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 PM to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

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 PM emissions to go beyond the premises of origin in quantities that the PM may be found on surfaces beyond the property line of origin. The nature or origin of the PM 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 PM 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.

Monitoring:

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
2. The permittee shall maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
 - b) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once every two weeks for a period of eight weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
 - c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

1. The permittee shall document all readings on Attachment D, or its equivalent, noting the following:

- a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- b) Whether equipment malfunctions contributed to an exceedance.
- c) Any violations and any corrective actions undertaken to correct the violation.

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 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

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 Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the 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 40 CFR Part 82, 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 MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B – Servicing of MVACs. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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 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 CFR and 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

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(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's 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.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-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, this includes deviations or 40 CFR Part 64 exceedances.
 - 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 10 CSR 10-6.065(6)(C)7.A 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 semi-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(6)(C)1.D Risk Management Plan Under §112(r)

1. 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 §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:
 - a) June 21, 1999;
 - b) Three years after the date on which a regulated substance is first listed under §68.130; or
 - c) The date on which a regulated substance is first present above a threshold quantity in a process.

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 semi-annually (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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and 40 CFR 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 §303 of the Act or §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 EPA and the Air Pollution Control Program 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

1. 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's 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.

2. §502(b)(10) changes. Changes that, under §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's 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program 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 application, 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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)39 Responsible Official

The application utilized in the preparation of this permit was signed by Scott Beckwith, President. 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 permittee 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 permittee 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

1. This permit may be reopened for cause if:
 - a) The Missouri Department of Natural Resources receives notice from the EPA that a petition for disapproval of a permit pursuant to §70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
 - b) The Missouri Department of Natural Resources 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,
 - c) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - i) The permit has a remaining term of less than three years;
 - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - iii) 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,
 - d) 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
 - e) The Missouri Department of Natural Resources 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.

STATEMENT OF BASIS

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 October 21, 2011
2. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
3. Construction Permit 102010-001, Issued October 5, 2010

Construction Permits

Construction Permit 102010-001, Issued October 5, 2010:

- ♦ This Section (6) NSR permit is for the construction of the entire installation. The permit limits HAPs and VOC below the NSR major source levels to avoid PSD review and limits PM₁₀ to the de minimis level to avoid increment modeling.
- ♦ The paint consumption calculations in this permit are based on a mass balance approach. A nozzle rate of 6.24 gal/hr, a load rate of 2.5 racks/min with 160 ft² of material to be painted per rack, and a spray application rate of 2.5 min/rack. EP-01 was determined to have an MHDR of 12.565 gal/hr. A paint transfer efficiency of 75 percent was applied for the use of an electrostatic system to limit overspray, which is subsequently controlled through the use of fabric filters in the booth areas. The fabric filters were assigned a control efficiency of 90 percent. These controls would not be impacted by conveyor speed.
- ♦ The installation provided a powder coat MHDR of 52.91 lb/hr for a single gun. The powder utilization rate was 90 percent and the filter control was 90 percent. This rate was projected at 8,760 hr/yr to determine the PTE for PM₁₀. Powder coating cannot occur while wet painting is being done in the same station of the booth. Therefore, the PTE of the installation utilizes the worst case pollutant from the worst case operation. The VOC PTE when using wet paint coating (454.15 tpy VOC) was much higher than the VOC PTE for powder coating (11.59 tpy VOC). Since the PM₁₀ value is higher for powder coating (18.64 tpy PM₁₀) than for wet spray coating (6.29 tpy PM₁₀), the powder coating PM₁₀ PTE was used in the installation PTE calculation for totals.
- ♦ Special Conditions 1 – 5 have been applied within this permit (see Permit Conditions PW001, PW002, 001, and 002).

Maximum Achievable Control Technology Applicability

40 CFR Part 63, Subpart M – *National Emission Standards for HAP for Surface Coating of Miscellaneous Metal Parts and Products* is applicable to the installation and has been applied within this permit (see Permit Condition 003). The compliant material option available under this regulation was included within the permit as the installation indicated this would be their primary choice for demonstrating compliance. Information regarding the emission rate without add-on controls option and the emission rate with add-on controls option is available at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=a381de93eb62713048e9d283adc2a3f3;rgn=div6;view=text;node=40%3A13.0.1.1.1.19;idno=40;cc=ecfr>

National Emission Standards for Hazardous Air Pollutants Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV Core Permit Requirements).

Compliance Assurance Monitoring Applicability

40 CFR Part 64 - *Compliance Assurance Monitoring*

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

This installation is a minor source of GHG.

Updated Potential to Emit (PTE) for the Installation

Pollutant	Unconditioned PTE (tpy) ¹	Conditioned PTE (tpy) ¹
CO	1.10	N/A
GHG (CO ₂ e)	1,580.46	N/A
NO _x	1.31	N/A
PM	18.64	N/A
PM ₁₀	18.64	<15.0
PM ₂₅	18.64	N/A
SO _x	0.01	N/A
VOC	449.38	<250.0
HAP	367.31	N/A
MIBK (108-10-1)	82.11	N/A
Dimethyl Phthalate (131-11-3)	80.09	N/A
Xylene (1330-20-7)	70.68	N/A
Glycol Ethers (20-10-0)	63.89	N/A
Toluene (108-88-3)	54.10	N/A
Ethylbenzene (100-41-4)	16.41	N/A
Hexane (110-54-3)	0.02	N/A

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Other Regulatory Determinations

10 CSR 10-6.170 *Restriction of PM to the Ambient Air Beyond the Premises of Origin* is applicable to the installation and has been applied within this permit (see Section IV Core Permit Requirements).

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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen, EIT
Environmental Engineer II

Mr. Scott Beckwith
Aluminum Finishers, LLC
P.O. Box 519
Monett, MO 65708

Re: Aluminum Finishers, LLC, 145-0063
Permit Number: **OP2013-071**

Dear Mr. Beckwith:

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.

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 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:ark

Enclosures

c: Southwest Regional Office
PAMS File: 2011-10-043