



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70 PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2010-121
Expiration Date: NOV 18 2015
Installation ID: 183-0010
Project Number: 2003-10-039

Installation Name and Address

The Boeing Company
P.O. Box 516, S111-2491
St. Louis, MO 63166
St. Charles County, Land Grant 161,
Township 47N, Range 5E, Section 32

Parent Company's Name and Address

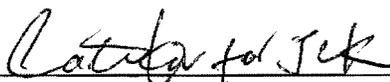
The Boeing Company
100 North Riverside
Chicago, IL 60605-1596

Installation Description:

The Boeing Company designs, develops, manufactures, integrates and supports a variety of aerospace and defense products. These include military and commercial aircraft; helicopters; missiles; space launch vehicles and other space systems; and sensing systems.

NOV 19 2010

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The Boeing Company, designs, develops, manufactures, integrates and supports a variety of aerospace, defense, and security products and services. These include military and commercial aircraft; helicopters; missiles; space launch vehicles and other space systems; and sensing systems. Examples of permitted equipment include paint spray booths, electronic cold cleaner, and boilers.

This facility is located in an ozone non-attainment area, which is an area where the concentration of ozone does not meet the National Ambient Air Quality Standards (NAAQS). The area is considered to be attainment for all other criteria pollutants.

The facility is located on over 200 acres, and employs just over 1,000 employees.

Reported Air Pollutant Emissions ¹								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs) ²
2009	0.42	0.17	0.01	2.24	5.99	1.88	-- ³	--
2008	0.37	0.05	0.02	2.56	14.85	2.15	0.00	--
2007	0.33	0.05	0.02	2.63	5.88	2.21	0.00	--
2006	1.59	0.05	0.02	2.93	13.60	2.09	0.00	--
2005	2.64	0.05	0.01	3.32	21.86	2.25	-- ⁴	--

¹ tons per year, unless otherwise noted

² HAPs may be reported as VOC or PM-10 for emission inventory purposes.

³ Emissions were below the reportable threshold.

⁴ Emissions were below the reportable threshold.

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. Information provided in the table is for informational purposes only. It shall not be construed to create limits, conditions, or requirements.

Permit #	EIQ Point	Emission Unit No.	Location					Level	Manufacturer	Model	Year	Description
			Bldg	Let1	Let2	Num1	Num2					
0396-014	CC-STC-01	CC-505-01	505	K		5		1				Cold Cleaner #1
0997-007	CS-STC-01	CS-598-01	598	K	L	17	25	1	Cleaver Brooks	CB400-500	1987?	NG/Fuel Oil Boiler 20.92 MMBTU/hr
0997-007	CS-STC-01	CS-598-02	598	K	L	17	25	1	Cleaver Brooks	CB400-500	1987?	NG/Fuel Oil Boiler 20.92 MMBTU/hr
--	CS-STC-01	CS-STC-01	PW	--	--	--	--	--	--	--	--	Plant-wide NG Combustion <10MMBTU/hr
--	CT-STC-01	--	PW	--	--	--	--	--	--	--	--	Plant-wide cooling towers
--	HC-STC-01	HC-STC-01	PW	--	--	--	--	--	--	--	--	Plant-wide aerospace handwipe solvent cleaning building fugitives
--	CL-STC-01	MB-598-02	598	K.1		48.9		1	--	--	--	Paint Mixing Booth
0396-022	CL-STC-01	OV-598-01	598	K.1		41		1	Cincinnati Industrial Machinery	C-800-C187		Spray Booth Oven (aerospace production)
0396-022	CL-STC-01	OV-598-02	598	K.1		41		1	Cincinnati Industrial Machinery	C800-C186		Spray Booth Oven (aerospace production)
0396-022	CL-STC-01	SB-598-01(03)	598	Q.2		61		1				Spray Booth (aerospace production)
0396-022	CL-STC-01	SB-598-02(04)	598	P.1		61		1				Spray Booth (aerospace production)
0396-022	CL-STC-01	SB-598-03/04(05)	598	I.2	N	61		1				Spray Booth (aerospace production)
0396-022	CL-STC-01	SB-598-05(02)	598	J		57		1				Spray Booth (aerospace production)
0396-022	CL-STC-01	SB-598-10 (01)	598	K.1		45		1	DevilBiss			Spray Booth (aerospace production)
0396-022	CL-STC-01	SB-599-06(01)	599	--	--	--	--	--	--	--	--	Spray Booth (aerospace production)
--	SC-STC-01	--	PW	--	--	--	--	--	--	--	--	Plant-wide Specialty Coatings

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations⁵ at the time of permit issuance. Plant wide conditions may apply to these units. All of the information provided in the table is for informational purposes only. It shall not be construed to create limits, conditions, or requirements.

Permit #	EIQ Point	Emission Unit No.	Location					Level	Manufacturer	Model	Year	Description
			Building	Let1	Let2	Num1	Num2					
--	HC-STC-01	CC-STC-01	PW	--	--	--	--	--	--	--	--	Spray Gun Cleaning Operations
--	CS-STC-01	CS-508-01	508	H	J	3	4	1	Cleaver Brooks	CB700-125	1983	NG/Fuel Oil Boiler 5.23 MMBTU/hr
--	CS-STC-01	CS-508-02	508	H	J	3	4	1	Cleaver Brooks	CB700-125	1983	NG/Fuel Oil Boiler 5.23 MMBTU/hr
--	CS-STC-01	CS-598-03	598	J	K	17	25	1	Cleaver Brooks	CB400-150	1978	NG/Fuel Oil Boiler 6.27 MMBTU/hr
--	CS-STC-01	CS-598-04	598	J	K	17	25	1	Cleaver Brooks	CB400-150	1978	NG/Fuel Oil Boiler 6.27 MMBTU/hr
--	CS-STC-01	CS-599-02	599	E	F	4	5	1	Cleaver Brooks	CB400-125	1978	NG/Fuel Oil Boiler 5.23 MMBTU/hr
--	CS-STC-01	CS-599-03	599	E	F	4	5	1	Cleaver Brooks	CB400-125	1978	NG/Fuel Oil Boiler 5.23 MMBTU/hr
--	CS-STC-01	EG-508-01	508	H	J	2		1	Katolight	N190FRZ4	1983	330 HP NG Emergency Generator
--	NONE	EG-550-01	550	--	--	--	--	1	Cummins	V504F2	1985	200 HP Fuel Oil Emergency Generator
--	CS-STC-01	EG-598-01	598	J		22		1	Kohler	100RZ72	1984	150 HP NG Emergency Generator
--	CS-STC-01	EG-598-02	598	L		22		1	Caterpillar	3306S1	1984	200 HP NG Emergency Generator
--	NONE	EG-598-03	598	J		33		1	Marathon	502FDR804866 M500 W	1986	465 HP Diesel Emergency Generator
--	CS-STC-01	EG-599-01	599	D	E	6		1	Onan	300EK15R/190 45M	1979	40 HP NG Emergency Generator
--	NONE	GB-598-02	598	R		45		1	C.A.B.			Abrasive Media Blaster
--	NONE	GB-598-01	598	R		48		1	Aerolyte Systems	BNP-600		Plastic Media Blast
--	NONE	GB-599-01	599	N	P	4	5	1	Abrasive Blasey Systems	370501		Abrasive Media Blaster
--	NONE	OV-STC-01	PW	--	--	--	--	--	--	--	--	Electric Curing Ovens
--	SC-STC-01	SB-505-01	505	K		5		1	Global Finishing Solutions		2007	Bench Spray Booth
--	SC-STC-01	SB-508-01	508	D		7		1	--	--	--	Lab Hood for electronics/R&D
--	SC-STC-01	SB-598-06	598	Q		13		1	--	--	--	Spray Booth (specialty coatings)
--	NONE	ST-598-01	598	--	--	--	--				1993	10,000 Gal UST Jet Fuel (JP-10)
--	NONE	ST-598-02	598	--	--	--	--				1986	25,000 gal Empty UST
--	NONE	ST-598-03	598	--	--	--	--					500 gal Gasoline AST
--	NONE	ST-599-01	599	--	--	--	--				1986	20,000 gal Empty UST
--	NONE	DP-STC-01	PW	--	--	--	--	--	--	--	--	Non-Chemical Depainting
--	MC-STC-01	MC-STC-01	PW	--	--	--	--	--	--	--	--	Chemical Depainting

⁵ DP-STC-01 and MC-STC-01 have Alternate Operating Scenarios that may apply.

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit No. 0396-014A
- 2) Construction Permit No. 0396-022A
- 3) Construction Permit No. 0997-007

II. Plant Wide Emission Limitations

The following requirements apply to all conditions in addition to any other requirements listed in the specific conditions, unless otherwise noted in the specific conditions.

Permit Condition PW-01

FEDERAL				DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Hand-wipe Solvent Cleaning Operations	10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	Missouri Department of Natural Resources Construction Permit #	
HC-STC-01	X ⁶	X	NA ⁷	Plant-wide aerospace handwipe cleaning building fugitives

10 CSR 10-6.075 - Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities
 40 CFR Part 63, Subpart A - General Provisions
 10 CSR 10-5.295 - Control of Emissions from Aerospace Manufacturing and Rework Facilities

Emission Limitations:

- 1) Housekeeping Measures:
 - Permittee shall institute and carry out a housekeeping program that requires the following: (§63.744(a))
 - a) Unless the permittee satisfies the requirements of 63.744(a)(4), or (d) below, place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in aerospace production in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs or equivalent used for very small cleaning operations are exempt from this requirement.

⁶ “X” means applicable.

⁷ “NA” means not applicable.

-
- b) Unless the permittee satisfies the requirements of (d) below, store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
 - c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
 - d) Demonstrate to the Administrator (or delegated State or local authority) that equivalent or better alternative measures are in place compared to the use of closed containers for the solvent-laden materials described in paragraph (a) of this section, or the storage of solvents described in paragraph (b) of this section.
 1. The utilization of flip-top bottles (regardless of the open or closed position of the flip-top) with an opening no larger than 0.012868 square inches of area (0.128 inch diameter) meets the equivalency requirements of 63.744(a)(4), or Section (d) above, provided the permittee complies with the maintenance plan in Appendix I of this permit.
- 2) This permit condition applies only to those activities involving the cleaning of aerospace vehicles and components and does not include activities excluded or exempted under Sections 63.741 or 63.744 of Subpart GG or other applicable sections.
 - 3) Hand-wipe cleaning:
 - a) Each owner or operator of a new or existing affected hand-wipe cleaning operation covered by 40 CFR Part 63, Subpart GG, shall use cleaning solvents that meet one of the following requirements:
 1. Meet one (1) of the composition requirements in Section 63.744 (Table 1) of the Aerospace MACT.
 2. Have a composite vapor pressure of 45 mm Hg or less at 20°C (68°F).
 3. Demonstrate that the volume of hand-wipe cleaning solvents used in affected cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be established as part of an approved alternative plan administered by the State.
 - b) The following cleaning operations are exempt from the requirements of (3) Hand-wipe cleaning:
 1. Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;
 2. Cleaning during the manufacture, assembly, installation, maintenance or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine, etc.);
 3. Cleaning and surface activation prior to adhesive bonding;
 4. Cleaning of electronic parts and assemblies containing electronic parts;
 5. Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to air heat exchangers and hydraulic fluid systems;
 6. Cleaning of fuel cells, fuel tanks, and confined spaces;
 7. Surface cleaning of solar cells, coated optics, and thermal control surfaces;
 8. Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;
 9. Cleaning of metallic and non-metallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
 10. Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing;

11. Cleaning of aircraft transparencies, polycarbonate or glass substrates;
12. Cleaning operations, using nonflammable liquids, conducted within five (5) feet of energized electrical systems. Energized electrical systems means AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections; and
13. Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR 82.4.

Monitoring

- 1) The composite vapor pressure of hand-wipe cleaning solvents used in a cleaning operation subject to this subpart shall be determined as follows (63.750(b)(1)):
 - a) For single-component hand-wipe cleaning solvents, the vapor pressure shall be determined by using MSDS or other manufacturer's data, standard engineering reference texts, or other equivalent methods (63.750(b)(1)).
- 2) The composite vapor pressure of a blended hand-wipe solvent shall be determined by quantifying the amount of each organic compound in the blend using manufacturer's supplied data or a gas chromatographic analysis in accordance with ASTM E 260-91 (incorporated by reference as specified in 63.14 of Subpart A of this part) and by calculating the composite vapor pressure of the solvent by summing the partial pressures of each component. The vapor pressure of each component shall be determined using the manufacturer's data, standard engineering texts or other equivalent methods. The following equation shall be used to determine the composite vapor pressure (63.750(b)(2)):

$$PP_c = \sum_{i=1}^n \frac{(W_i)(VP_i) / MW_i}{\frac{W_w}{MW_w} + \sum_{e=1}^n \frac{W_e}{MW_e} + \sum_{i=1}^n \frac{W_i}{MW_i}}$$

Where:

W_i = Weight of the "i"th VOC compound, grams.

W_w = Weight of water, grams.

W_e = Weight of non-HAP, nonVOC compound, grams.

MW_i = Molecular weight of the "i"th VOC compound, g/g-mole.

MW_w = Molecular weight of water, g/g-mole.

MW_e = Molecular weight of exempt compound, g/g-mole.

PP_c = VOC composite partial pressure at 20°C, mm Hg.

VP_i = Vapor pressure of the "i"th VOC compound at 20°C, mm Hg.
(§63.750(b))

Record Keeping:

- 1) Each owner or operator of a new or existing cleaning operation subject to this subpart shall record the information specified below:
 - a) The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility. (§63.752(b)(1))
 - b) For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in §63.744(b)(1) or for semi-aqueous cleaning solvents used for flush cleaning operations: (§63.752(b)(2))
 1. The name of each cleaning solvent used; and (§63.752(b)(2)(i))
 2. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements. (§63.752(b)(2)(ii))

3. Annual records of the volume of each solvent used, as determined from facility purchase records or usage records. (§63.752(b)(2)(iii))
- c) For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in §63.744(b)(1), but does comply with the vapor pressure requirement in §63.744(b)(2): (§63.752(b)(3))
 1. The name of each cleaning solvent used: (§63.752(b)(3)(i))
 2. The composite vapor pressure of each cleaning solvent used: (§63.752(b)(3)(ii))
 3. All vapor pressure test results, if appropriate, data and calculations used to determine the composite vapor pressure of each cleaning solvent; and (§63.752(b)(3)(iii))
 4. The amount (in gallons) of each cleaning solvent used each month at each operation. (§63.752(b)(3)(iv))
- 2) For each cleaning solvent used for exempt hand-wipe cleaning operations specified in §63.744(e) that does not conform to the vapor pressure or composition requirements of §63.744(b): (§63.752(b)(4))
 - a) The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and (§63.752(b)(4)(i))
 - b) A list of the exempt processes to which the cleaning operation applies. (§63.752(b)(4)(ii))
- 3) For cleaning solvents subject to 10 CSR 10-5.295, maintain:
 - a) A list of materials with corresponding water contents for aqueous and semi-aqueous hand-wipe cleaning solvents;
 - b) A current list of cleaning solvents in use with their respective vapor pressure, or for blended solvents, VOC composite vapor pressure for all vapor pressure compliant hand-wipe cleaning solvents. This list shall include the monthly amount of each applicable solvent used; and
 - c) A current list of exempt hand-wipe cleaning processes for all cleaning solvents with a vapor pressure greater than forty-five (45) mmHg used in exempt hand-wipe cleaning operations. This list shall include the monthly amount of each applicable solvent used.

Reporting:

- 1) Each owner or operator of a hand wipe solvent operation subject to MACT Subpart GG shall submit the following information to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.
 - a) Semiannual reports occurring every six (6) months that identify:
 1. Any instance where a non-compliant cleaning solvent is used for a nonexempt hand-wipe cleaning operation;
 2. A list of any new cleaning solvents used for hand-wipe cleaning in the previous six (6) months, and as appropriate, their composite vapor pressure or notification that they comply with the composition requirements;
 3. If the operations have been in compliance for the semiannual period, the report may contain a statement that the cleaning operations have been in compliance with the applicable standards.
 - b) Semiannual reports are due by: October 1st for monitoring which covers the January through June time period; and, April 1st for monitoring which covers the July through December time period.

**Permit Condition PW-02
 Depainting**

FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP	Missouri Department of Natural Resources Construction Permit #	
MC-STC-01	NA	NA	Plant-wide chemical depainting
GB-598-01	NA	NA	Plastic Media Blast
GB-598-02	NA	NA	Abrasive Media Blast
GB-599-01	NA	NA	Abrasive Media Blast

Permit Condition PW-03

Depainting Alternate Operating Scenario

(Applies if the facility depaints 7 or more completed aircraft in a calendar year)

FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP	Missouri Department of Natural Resources Construction Permit #	
MC-STC-01	X	NA	Plant-wide chemical depainting
GB-598-01	X	NA	Plastic Media Blast
GB-598-02	X	NA	Abrasive Media Blast
GB-599-01	X	NA	Abrasive Media Blast

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities
40 CFR Part 63, Subpart A General Provisions

Alternate Operating Scenario – This condition applies if the facility depaints 7 or more completed aircraft in a calendar year.

This permit condition applies to activities involving depainting of aerospace production parts, assemblies, and vehicles. The following are not subject to this permit condition:

- (1) Activities involving research and development, quality control, and laboratory testing ;
- (2) Wastes that are determined to be hazardous wastes under the Resource Conservation and Recovery Act of 1976 (PL 94-580) (RCRA) as implemented by 40 CFR Parts 260 and 261, and that are subject to RCRA requirements as implemented in 40 CFR Parts 262 through 268; or
- (3) Such other cleaning activities as are exempted by 40 CFR §63.741.

Emission/Operational Limitation:

Applicability. Each owner or operator of a new or existing depainting operation subject to this subpart shall comply with the requirements in paragraphs 1) through 3) of this section, This section does not apply to an aerospace manufacturing or rework facility that depaints six or less completed aerospace vehicles in a calendar year.

- 1) The provisions of this section apply to the depainting of the outer surface areas of completed aerospace vehicles, including the fuselage, wings, and vertical and horizontal stabilizers of the aircraft, and the outer casing and stabilizers of missiles and rockets. These provisions do not apply to the depainting of parts or units normally removed from the aerospace vehicle for depainting. However, depainting of wings and stabilizers is always subject to the requirements of this section regardless of whether their removal is considered by the owner or operator to be normal practice for depainting.
- 2) Aerospace vehicles or components that are intended for public display, no longer operational, and not easily capable of being moved are exempt from the requirements of this section.
- 3) The following depainting operations are exempt from the requirements of this section:
 - a) Depainting of radomes; and
 - b) Depainting of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting. ((§63.746(a))
- 4) For **Chemical** Depainting:
 - a) *HAP emissions - non-HAP chemical strippers and technologies.* Except as provided in 4)b) and 5)a), the permittee of a new or existing aerospace depainting operation subject to this subpart shall emit no organic HAP from chemical stripping formulations and agents or chemical paint softeners. (§63.746(b)(1))
 - b) Each owner or operator of a new or existing depainting operation shall not, on an annual average basis, use more than 26 gallons of organic HAP-containing chemical strippers or alternatively 190 pounds of organic HAP per commercial aircraft depainted; or more than 50 gallons of organic HAP-containing chemical strippers or alternatively 365 pounds of organic HAP per military aircraft depainted for spot stripping and decal removal. (§63.746(b)(3))
- 5) For **Mechanical** Depainting⁸

⁸ Applies only to the plastic and abrasive media blasters.

- a) Where *non*-chemical based equipment is used to comply with paragraph 4)a), either in total or in part, the permittee shall maintain the equipment according to the manufacture's specifications or locally prepared procedures. During periods of malfunctions of such equipment, the permittee may substitute materials during the repair period provided the substitute materials used are those available that minimize organic HAP emissions. In no event shall substitute materials be used for more than fifteen (15) days annually, unless such materials are organic HAP-free. (§63.746(b)(2))
- b) The permittee complying with Emission Limitation 3, that generates airborne inorganic HAP emissions from dry media blasting equipment, shall also comply with the requirements specified in 1. through 3. that follow: (§63.746(b)(4))
 1. Perform the depainting operation in an enclosed area, unless a closed-cycle depainting system is used.
 2. For existing sources pass any air through a baghouse before exhausting it to the atmosphere. (§63.746(b)(4)(ii)(A))
 3. Mechanical and hand sanding operations are exempt from the requirements in Emission Limitation 4. (§63.746(b)(5))
- 6) General Provisions:
 - a) The permittee is also subject to the following: (§63.743(a))
 1. §63.4, Prohibited activities and circumvention; (§63.743(a)(1))
 2. §63.5, Construction and reconstruction; and (§63.743(a)(2))
 3. §63.6, Compliance with standards and maintenance requirements. (§63.743(a)(3))
 - b) Startup, *shutdown*, and *malfunction plan*. A startup, shutdown, and malfunction plan shall be prepared for the baghouses (that are operational) using locally prepared operating procedures. This plan shall also include the following provisions: (§63.743(b))
 1. The plan shall specify the operation and maintenance criteria for each air pollution control device or equipment and shall include a standardized checklist to document the operation and maintenance of the equipment; (§63.743(b)(1))
 2. The plan shall include a systematic procedure for identifying malfunctions and for reporting them immediately to supervisory personnel; and (§63.743(b)(2))
 3. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur. (§63.743(b)(3))
 - c) *Except* all wastes that are determined to be hazardous wastes under the [Resource Conservation and Recovery Act of 1976 \(PL 94-580\)](#) (RCRA) as implemented by 40 CFR Parts 260 and 261, and that are subject to [RCRA](#) requirements as implemented in 40 CFR Parts 262 through 268 (§63.741(e)), the owner or operator of each facility subject to 40 CFR Part 63, Subpart GG that produces a waste that contains HAP shall conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills. (§63.748)
 - d) For those wastes subject to 40 CFR Part 63, Subpart GG, failure to comply with the requirements specified in §63.748 shall be considered a deviation. (§63.749(i))

Monitoring:

- 1) For Mechanical Depainting: None (Baghouse not subject to 40 CFR Part 63.746 b 4 iii (A, B, C and D).
- 2) For Chemical Depainting: Each owner or operator seeking to comply with *Emission Limitation 2*. above shall determine the volume of organic HAP-containing chemical strippers or alternatively the

weight of organic HAP used per aircraft using the procedure specified in a) through c) that follow: (§63.750(j))

- a) For each chemical stripper used for spot stripping and decal removal, determine for each annual period the total volume as applied or the total weight of organic HAP using the procedure specified in §63.750(d)(2) below: (§63.750(j)(1))
 1. Determine the volume both in total gallons as applied and in total gallons (less water) as applied of each coating. If any ingredients, including diluent solvents, are added prior to its application, the volume of each coating shall be determined at a time and location in the process after all ingredients (including any diluent solvent) have been added. (§63.750(d)(2)(i))
 2. Determine the volume of each coating (less water) as applied each month,. (§63.750(d)(2)(ii))
 3. The volume applied may be determined from company records. (§63.750(d)(2)(iii))
- b) Determine the total number of aircraft for which depainting operations began during the annual period as determined from company records. (§63.750(j)(2))
- c) Calculate the annual average volume of organic HAP-containing chemical stripper or weight of organic HAP used for spot stripping and decal removal per aircraft using equation 20 (volume) or equation 21 (weight): (§63.750(j)(3))
(Eq. 20)

$$C = \frac{\sum_{i=1}^n V_{si}}{A}$$

Where

C = annual average volume (gal per aircraft) of organic HAP-containing chemical stripper used for spot stripping and decal removal.

n = number of organic HAP-containing chemical strippers used in the annual period.

V_{si} = volume (gal) of organic HAP-containing chemical stripper i used during the annual period.

A = number of aircraft for which depainting operations began during the annual period.

(Eq. 21)

$$C = \frac{\sum_{i=1}^n \left(V_{si} D_{hi} \left(\sum_{i=1}^m W_{hi} \right) \right)}{A}$$

Where

C = annual average weight (lb per aircraft) of organic HAP (chemical stripper) used for spot stripping and decal removal.

m = number of organic HAP contained in each chemical stripper, as applied.

n = number of organic HAP-containing chemical strippers used in the annual period.

W_{hi} = weight fraction (expressed as a decimal) of each organic HAP “i” contained in the chemical stripper, as applied, for each aircraft depainted.

D_{hi} = density (lb/gal) of each organic HAP-containing chemical stripper “i”, used in the annual period.

V_{si} = volume (gal) of organic HAP-containing chemical stripper “i” used during the annual period.

A = number of aircraft for which depainting operations began during the annual period. (§63.750(j))

Record Keeping:

The permittee shall fulfill the following recordkeeping requirements: (§63.752(a))

- 1) General:
 - a) For each type of aircraft depainted at the facility, a listing of the parts, subassemblies, and assemblies normally removed from the aircraft before depainting. Prototype, test model or aircraft that exist in low numbers (i.e., less than 25 aircraft of any one type) are exempt from this requirement. (§63.752(e)(4))
- 2) For Chemical Depainting:
 - a) For all chemical strippers used in the depainting operation: (§63.752(e)(1))
 1. The name of each chemical stripper; and, (§63.752(e)(1)(i))
 2. Monthly volumes of each organic HAP-containing chemical stripper used or monthly weight of organic HAP-material used for spot stripping and decal removal. (§63.752(e)(1)(ii))
 - b) *Spot stripping and decal removal.* For spot stripping and decal removal, the volume of organic HAP-containing chemical stripper or weight of organic HAP used, the annual average volume of organic HAP-containing stripper or weight of organic HAP used per aircraft, the annual number of aircraft stripped, and all data and calculations used. (§63.752(e)(6))
- 3) For Mechanical Depainting:
 - a) *Non-chemical based equipment.* If dry media blasting equipment is used to comply with the organic HAP emission limit specified in §63.746(b)(1): (§63.752(e)(5))
 1. The names and types of non-chemical based equipment; and, (§63.752(e)(5)(i))
 2. For periods of malfunction: (§63.752(e)(5)(ii))
 - i) The non-chemical method or technique that malfunctioned; (§63.752(e)(5)(ii)(A))
 - ii) The date that the malfunction occurred; (§63.752(e)(5)(ii)(B))
 - iii) A description of the malfunction; (§63.752(e)(5)(ii)(C))
 - iv) The methods used to depaint aerospace vehicles during the malfunction period; (§63.752(e)(5)(ii)(D))
 - v) The dates that these methods were begun and discontinued; and (§63.752(e)(5)(ii)(E))
 - vi) The date that the malfunction was corrected. (§63.752(e)(5)(ii)(F))

Reporting:

The permittee shall submit semiannual reports that identify: (§63.753(d)(1))

- 1) Any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in §63.746 (a), (b)(3), and (b)(5). (§63.753(d)(1)(i))
- 2) Any new chemical strippers used at the facility during the reporting period; (§63.753(d)(1)(ii))
- 3) The organic HAP content of these new chemical strippers; (§63.753(d)(1)(iii))
- 4) For each chemical stripper that undergoes reformulation, its organic HAP content; (§63.753(d)(1)(iv))
- 5) Any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed; (§63.753(d)(1)(v))
- 6) For periods of malfunctions: (§63.753(d)(1)(vi))
 - a) The non-chemical method or technique that malfunctioned; (§63.753(d)(1)(vi)(A))
 - b) The date that the malfunction occurred; (§63.753(d)(1)(vi)(B))
 - c) A description of the malfunction; (§63.753(d)(1)(vi)(C))
 - d) The methods used to depaint aerospace vehicles during the malfunction period; (§63.753(d)(1)(vi)(D))

- e) The dates that these methods were begun and discontinued; and (§63.753(d)(1)(vi)(E))
- f) The date that the malfunction was corrected; (§63.753(d)(1)(vi)(F))
- 7) All periods where a nonchemical depainting operation subject to §63.746(b)(2) and (b)(4) for the control of inorganic HAP emissions was not immediately shut down when the pressure drop, water flow rate, or recommended booth parameter(s) was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures.
- 8) A list of new and discontinued aircraft models depainted at the facility over the last six months and a list of the parts normally removed for depainting for each new aircraft model being depainted; and, (§63.753(d)(1)(viii))
- 9) If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards. (§63.753(d)(1)(ix))
- 10) The permittee shall submit annual reports that identify: (§63.753(d)(2))
 The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in §63.746(b)(3); and (§63.753(d)(2)(i))
- 11) Semiannual reports are due by: October 1st for monitoring which covers the January through June time period; and, April 1st for monitoring which covers the July through December time period.

Permit Condition PW-04

FEDERAL					DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Spray Gun Cleaning Operations and	10 CSR 10-5.300: Control of Emissions from Solvent Metal Cleaning	Missouri Department of Natural Resources Construction Permit #	
CC-STC-01	X	X	NA	NA	Plant-wide spray gun cleaning

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities
 40 CFR Part 63, Subpart A General Provisions
 10 CSR 10-5.295 Control of Emissions from Aerospace Manufacturing and Rework Facilities

This permit condition applies to activities involving cleaning of spray guns used to apply coatings to aerospace production parts, assemblies, and vehicles. The following are not subject to this permit condition:

- 1) Activities involving research and development, quality control, and laboratory testing ;

- 2) Wastes that are determined to be hazardous wastes under the Resource Conservation and Recovery Act of 1976 (PL 94-580) (RCRA) as implemented by 40 CFR Parts 260 and 261, and that are subject to RCRA requirements as implemented in 40 CFR Parts 262 through 268; or
- 3) Such other cleaning activities as are exempted by 40 CFR §63.741.

Emission Limitation/Operational Limitation:

- 1) Housekeeping measures:
 - a) The permittee shall institute and carry out a housekeeping program that requires the following:
 1. Unless the owner or operator satisfies the requirements in 1)a)4. below, place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning are exempt from this requirement. (§63.744(a)(1))
 2. Unless the owner or operator satisfies the requirements in 1)a)4. below, store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers. (§63.744(a)(2))
 3. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills. (§63.744(a)(3))
 4. Demonstrate to the Administrator (or delegated State, local, or Tribal authority) that equivalent or better alternative measures are in place compared to the use of closed containers for the solvent-laden materials described in 1)a)1. above, or the storage of solvents described in 1)a)2. above. (§63.744(a)(4))
- 2) Spray gun cleaning.
 - a) The permittee shall use one or more of the techniques, or their equivalent, specified in 2)a)1. through 4. below. Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below de minimis levels specified in §63.741(f) are exempt from the requirements in 2)a)1. through 4. below. (§63.744(c))
 1. Enclosed System. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the cleaning solvent through the gun. If leaks are found during the monthly inspection required in §63.751(a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued. (§63.744(c)(1)(i) and (ii))
 2. Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use. (§63.744(c)(2))
 3. Disassembled spray gun cleaning. Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components. (§63.744(c)(3))
 4. Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions. (§63.744(c)(4))

- b) Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of 2)a) above. (§63.744(c)(5))
- 3) Compliance -Cleaning Operations - Each cleaning operation subject to this subpart shall be considered in noncompliance if the permittee fails to institute and carry out the housekeeping measures required under 1. of this section. Incidental emissions resulting from the activation of pressure release vents and valves on enclosed cleaning systems are exempt from a. below. (§63.749(c))
- a) *Spray gun cleaning.* An affected spray gun cleaning operation shall be considered in compliance when each of the following conditions are met: (§63.749(c)(2))
1. One or more⁹ of the four techniques specified in 2)a) above is/are used; (§63.749(c)(2)(i))
 2. The technique selected is operated according to the procedures specified in 2)a) above as appropriate; and, (§63.749(c)(2)(ii))
 3. If an enclosed system is used, monthly visual inspections are conducted and any leak detected is repaired within 15 days after detection. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shut down until the cleaner is repaired or its use is permanently discontinued. (§63.749(c)(2)(iii))
- 4) Except all wastes that are determined to be hazardous wastes under the Resource Conservation and Recovery Act of 1976 (PL 94–580) (RCRA) as implemented by 40 CFR Parts 260 and 261, and that are subject to RCRA requirements as implemented in 40 CFR Parts 262 through 268, are exempt from the requirements of this subpart, the owner or operator of each facility subject to 40 CFR Part 63, Subpart GG that produces a waste that contains HAP shall conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills. (§63.748)
- a) For those wastes subject to 40 CFR Part 63, Subpart GG, failure to comply with the requirements specified in §63.748 shall be considered a deviation. (§63.749(i))

Monitoring:

Each permittee using an enclosed spray gun cleaner under *Emission Limitation* 2) above shall visually inspect the seals and all other potential sources of leaks associated with each enclosed spray gun cleaner system at least once per month. Each inspection shall occur while the system is in operation. (§63.751(a))

Record Keeping:

- 1) The permittee shall record the information specified below: (§63.752(b))
- a) The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility. (§63.752(b)(1))
 - b) A record of all leaks from enclosed spray gun cleaners that includes for each leak found: (§63.752(b)(5))
 1. Source identification
 2. Date leak was discovered
 3. Date leak was repaired

Reporting:

The permittee shall submit the following information: (§63.753(b))

- 1) Semiannual reports that identify: (§63.753(b)(1))

⁹ Spray gun cleaning may involve different cleaning methods for thorough cleaning (i.e. combining non-atomized with disassembled) and different painters may use different techniques at the same time.

- a) Any instance where a noncompliant spray gun cleaning method is used. (§63.753(b)(1)(iii))
 - b) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than fifteen (15) days. (§63.753(b)(1)(iv))
 - c) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements. (§63.753(b)(1)(v))
- 2) Semiannual reports are due by: October 1st for monitoring which covers the January through June time period; and, April 1st for monitoring which covers the July through December time period.

Permit Condition PW-05

FEDERAL				DESCRIPTION (for information only, this does not create any permit requirements)
Emission Unit Number	10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	Missouri Department of Natural Resources Construction Permit #	
SC-STC-01	X	NA	NA	Plant-wide Specialty Coatings
SB-505-01	NA	NA	NA	Bench Spray Booth
SB-508-01	NA	NA	NA	Lab Hood for electronics/R&D
SB-598-06	X	NA	NA	Spray Booth (specialty coatings)

10 CSR 10-5.295 *Control of Emissions from Aerospace Manufacturing and Rework Facilities*

Emission Limitations:

- 1) Specialty coatings shall be limited to a VOC content as expressed in Table I of this rule (See Appendix B).
- 2) Monthly averaging within specialty coating type may be used.
- 3) This permit condition applies only to those activities involving the cleaning or coating of aerospace vehicles and components and shall not include activities excluded or exempted under (3)(I) of the rule.
- 4) The requirements for primers, topcoats, specialty coatings, and chemical milling maskants specified in 5.295 Subsection (3)(A) does not apply to the use of low-volume coatings in these categories for which the annual total of each separate formulation used at a facility does not exceed 50 gal, and the combined annual total of all such primers and topcoats used at a facility does not exceed 200 gal.

Monitoring/Record Keeping:

- 1) Maintain a list of coatings in use with category and VOC content as applied.
- 2) Record coating usage on a monthly basis.

- 3) For coating operations that achieve compliance through averaging, maintain records of monthly volume-weighted average VOC content for each regulated coating type.

Reporting:

No later than thirty (30) days after the discovery of an exceedance of the VOC content limit specified in the emission limitations above, submit a written report to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Permit Condition PW-06

FEDERAL		
Type	10 CSR 10-6.220: Restriction of Emission of Visible Air Contaminants	DESCRIPTION (for information only, this does not create any permit requirements)
All Sources	X	Any part or activity of an installation that emits or has the potential to emit any regulated air pollutant.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*

Emission Limitations:

- 1) The permittee shall not discharge into the ambient air from any source, not exempted under this rule, any air contaminant of opacity greater than twenty (20%) percent.
- 2) A source with a 20% opacity limit may emit air contaminants with opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes.
- 3) Where the presence of uncombined water is the only reason for failure of an emission to meet the opacity requirements, the opacity requirements shall not apply.

Monitoring:

- 1) Conduct visual emission observations of each area of the facility where emission units are present. Every emission unit shall be included in a designated area subject to approval by the permitting authority. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible emissions are observed, then no further observations are required. For emission units where visible emissions are observed with the exception of uncombined water, the source representative shall then conduct a Method 9 observation.
- 2) Observations must be made once per month. If an exceedance of the opacity limitation is noted, then:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks.
 - b) Should the permittee observe no opacity violations during this period, then:

1. The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
2. If an opacity violation is noted, then monitoring reverts to weekly (step 2)a) above).
3. Should no opacity violation be observed during this period, then:
 - i) The permittee may observe once per month (step 2) above).
 - ii) If an opacity violation is noted, monitoring reverts to weekly (step 2)a) above).

Record Keeping:

- 1) Maintain records of all observation results noting whether any air emissions (except for water vapor) were visible from the emission units.
- 2) Maintain records of all Method 9 tests performed in accordance with this permit condition.
- 3) Maintain records of all equipment malfunctions and repairs when the malfunction results in an exceedance of the opacity limitation.

Reporting:

Report to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, no later than thirty (30) days after the discovery of an exceedance of the opacity limit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

CC-505-01 – Cold Cleaner

FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	10 CSR 10-5.300: Control of Emissions from Solvent Metal Cleaning	Missouri Department of Natural Resources Construction Permit #	
CC-505-01	NA	0369-014	Cold Cleaner

Permit Condition CC-505-01-A
 10 CSR 10-6.060 *Construction Permits Required* Construction Permit #0396-014 (Special Conditions 1, 2 and 3)

Emission Limitation:

The total combined emissions of VOC from the operation of CC-505-01 shall be limited to 12.2 tons in any consecutive 12-month period.

Monitoring/Record Keeping:

Keep records for the most recent five-year period of operation that shows the tons of VOC emitted. All emissions shall be calculated using material mass balance based on 100% VOC content of the solvent used. The records shall contain both the monthly and 12-month totals.

Reporting:

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 (10) days after the end of each month, if the 12-month cumulative total (Monitoring/Record Keeping requirement) records show that the source exceeded the *Emission Limitation* of this permit condition. This does not have to be signed by the responsible official.

Group Spray Booths

FEDERAL					DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	Missouri Department of Natural Resources Construction Permit #	
SB-598-01(03)	X	X	NA	0396-022	Spray Booth (aerospace production)
SB-598-02(04)	X	X	NA	0396-022	Spray Booth (aerospace production)
SB-598-03/04(05)	X	X	NA	0396-022	Spray Booth (aerospace production)
SB-598-05(02)	X	X	NA	0396-022	Spray Booth (aerospace production)
SB-598-10 (01)	X	X	NA	0396-022	Spray Booth (aerospace production)
SB-599-06(01)	X	X	NA	0396-022	Spray Booth (aerospace production)
SC-STC-01	X	X	NA	NA	Plant-wide Fugitive Painting (aerospace production)

Note: The number in parenthesis in the Emission Unit Number column refers to the emission unit number in construction permit 0396-022

Permit Condition Group Spray Booths-A
 10 CSR 10-6.060 *Construction Permits Required* Construction Permit #0396-022A (Special Condition 1 and 2)

Emission Limitation:

The total combined emissions of volatile organic compounds (VOCs) from the following emission units shall be limited to 77.95 tons in any consecutive 12-month period: Coating Booths (SB) 598-01 through SB 598-05 inclusive, SB 599-01, and Ovens (OV) 598-01 through OV 598-02 inclusive.

Monitoring/Record Keeping:

Records shall be kept for the most recent five-year period of plant operation. The records shall contain both the monthly and 12-month totals. These records shall be made available to Department of Natural Resources' personnel upon request.

Permit Condition Group Spray Booths-B

10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*

40 CFR Part 63 Subpart GG *National Emission Standards for Aerospace Manufacturing and Rework Facilities*

40 CFR Part 63, *Subpart A General Provisions*

10 CSR 10-5.295 *Control of Emissions from Aerospace Manufacturing and Rework Facilities*

This permit condition applies to activities involving the coating of aerospace production parts, assemblies, and vehicles. The following are not subject to this permit condition:

- (1) Activities involving research and development, quality control, and laboratory testing;
- (2) Wastes that are determined to be hazardous wastes under the Resource Conservation and Recovery Act of 1976 (PL 94-580) (RCRA) as implemented by 40 CFR Parts 260 and 261, and that are subject to RCRA requirements as implemented in 40 CFR Parts 262 through 268; or
- (3) Such other cleaning activities as are exempted by 40 CFR §63.741.

Emission Limitation:

1) Organic HAP and VOC

a) Primer

- i) Shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- ii) Shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- iii) The VOC content may be used as a surrogate for the organic HAP content.

b) Topcoats:

- i) Shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
- ii) Shall be limited to an organic HAP content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- iii) The VOC content may be used as a surrogate for the organic HAP content.

c) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits.

- i) The application of low solvent coating technology where the monthly volume-weighted average VOC content of each specified coating type meets the specified applicable limitation expressed in pounds (grams) of VOC per gallon (liter) of coating, excluding water and exempt solvents, averaging is not allowed for specialty coatings, and averaging is not allowed between primers, topcoats (including self-priming topcoats), Type I milling maskants, and Type II milling maskants or any combination of the above coating categories;

d) Specialty Coatings:

- i) The VOC content limits listed in Appendix B (Table 1 of 10 CSR 5.295) expressed in pounds per gallon of coating, excluding water and exempt solvent, delivered to a coating applicator that applies specialty coatings;

2) *Inorganic HAP emissions – primer and topcoat application operations.*

a) For each primer or topcoat application operation that emits inorganic HAP, the operation is in compliance when: (§63.749(e))

- i) It is operated according to the requirements specified in §63.745(g)(1) through (g)(3); (§63.749(e)(1))

(1) The requirements of paragraphs §63.745(g)(1) through (g)(3) of this section do not apply to the following:

- (a) Touch-up of scratched surfaces or damaged paint;
 - (b) Hole daubing for fasteners;
 - (c) Touch-up of trimmed edges;
 - (d) Coating prior to joining dissimilar metal components;
 - (e) Stencil operations performed by brush or air brush;
 - (f) Section joining;
 - (g) Touch-up of bushings and other similar parts;
 - (h) Sealant detackifying;
 - (i) Painting parts in an area identified in a title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth; and
 - (i) The part is too large to be painted in a booth;
 - (ii) The coating is not spray applied.
 - (iii) The part would need to be removed from parts that have been painted in a booth;
 - (iv) Rework on parts that have been painted in a booth at a tool is not restricted to place subsequent operations in a booth.
 - (v) Other operations with a coating analysis are not in the part painted application methods;
 - (j) The use of hand-held spray application methods;
- (2) It is shut down immediately whenever the pressure drop is outside the limit(s) established for them and is not restarted until the pressure drop is returned within these limit(s), as required under §63.745(g)(3). (§63.749(e)(2))
- b) Inorganic HAPs– The permittee shall comply with the following applicable requirements: (§63.745(g))
- i) Apply these coatings in a booth or hangar in which air flow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets. (§63.745(g)(1))
 - ii) Control the air stream from this operation as follows: (§63.745(g)(2))
 - (1) For existing sources: (§63.745(g)(2)(i) and (ii))
 - (a) Before exhausting it to the atmosphere, pass the air stream through a dry particulate filter system certified using the methods described in §63.750(o) to meet or exceed the efficiency data points in Tables 1 and 2 of §63.745(g); (§63.745(g)(2)(i)(A))
 - iii) If the pressure drop across the dry particulate filter system, as recorded pursuant to §63.752(d)(1), is outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures, shut down the operation immediately and take corrective action. If the booth manufacturer's or locally prepared maintenance procedures for the filter have not been performed as scheduled, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop is returned within specified limits(s). (§63.745(g)(3))
- 3) Except as provided in paragraphs (a)(4) through (a)(10) of §63.743(a) and in Table 1 of 40 CFR Part 63, Subpart GG, the permittee is also subject to the following sections of subpart A of this part: (§63.743(a))

- a) No additional requirements. All subpart A requirements are covered elsewhere in this permit condition.
- 4) Except all wastes that are determined to be hazardous wastes under the Resource Conservation and Recovery Act of 1976 (PL 94–580) (RCRA) as implemented by 40 CFR Parts 260 and 261, and that are subject to RCRA requirements as implemented in 40 CFR Parts 262 through 268, are exempt from the requirements of this subpart, the owner or operator of each facility subject to 40 CFR Part 63, Subpart GG that produces a waste that contains HAP shall conduct the handling and transfer of the waste to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills. (§63.748)
 - a) For those wastes subject to 40 CFR Part 63, Subpart GG, failure to comply with the requirements specified in §63.748 shall be considered a deviation. (§63.749(i))
- 5) For the purposes of compliance with the requirements of §63.5(b)(4) of the General Provisions and this subpart, owners or operators of existing primer or topcoat application operations and depainting operations who construct or reconstruct a spray booth or hangar that does not have the potential to emit 10 tons per year or more of an individual inorganic HAP or 25 tons per year or more of all inorganic HAP combined shall only be required to notify the Administrator of such construction or reconstruction on an annual basis. Notification shall be submitted on or before March 1 of each year, and shall include the information required in §63.5(b)(4) for each such spray booth or hangar constructed or reconstructed during the prior calendar year, except that such information shall be limited to inorganic HAP's. No advance notification or written approval from the Administrator pursuant to §63.5(b)(3) shall be required for the construction or reconstruction of such a spray booth or hangar unless the booth or hangar has the potential to emit 10 tons per year or more of an individual inorganic HAP or 25 tons per year or more of all inorganic HAP combined. (§63.743(a)(10))

Operational Limitation:

- 1) The permittee shall conduct the handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills. (§63.745(b))
- 2) The permittee shall comply with the requirements specified in a) and b) below. (§63.745(f))
 - a) All primers and topcoats (including self-priming topcoats) shall be applied using one or more of the application techniques in i) through ix) below: (§63.745(f)(1))
 - i) Flow/curtain application; (§63.745(f)(1)(i))
 - ii) Dip coat application; (§63.745(f)(1)(ii))
 - iii) Roll coating; ((§63.745(f)(1)(iii))
 - iv) Brush coating; ((§63.745(f)(1)(iv))
 - v) Cotton-tipped swab application; ((§63.745(f)(1)(v))
 - vi) Electrodeposition (dip) coating; ((§63.745(f)(1)(vi))
 - vii) High volume low pressure (HVLP) spraying; ((§63.745(f)(1)(vii))
 - viii) Electrostatic spray application; or, ((§63.745(f)(1)(viii))
 - ix) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined according to the requirements in §63.750(i). ((§63.745(f)(1)(ix))
 - b) All application devices used to apply primers or topcoats (including self-priming topcoats) shall be operated according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP and electrostatic spray application techniques. (§63.745(f)(2))
 - c) The following situations are exempt from the requirements of 2.a) above: (§63.745(f)(3))

- i) Any situation that normally requires the use of an airbrush or an extension on the spray gun to properly reach limited access spaces;
- ii) The application of coatings that contain fillers that adversely affect atomization with HVLP spray guns and that the permitting agency has determined cannot be applied by any of the application methods specified in paragraph (f)(1) of this section;
- iii) The application of coatings that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.) and that the permitting agency has determined cannot be applied by any of the application methods specified in 2.a) above;
- iv) The use of airbrush application methods for stenciling, lettering, and other identification markings;
- v) The use of hand-held spray can application methods; and,
- vi) Touch-up and repair operations.

Monitoring:

If a dry particulate filter system is used, the following requirements shall be met when aerospace production primer or topcoat containing inorganic HAP is applied in the unit:

- 1) Maintain the system in good working order (§63.745(g)(2)(iv)(A))
- 2) Install a differential pressure gauge across the filter banks (§63.745(g)(2)(iv)(B))
- 3) Continuously monitor the pressure drop across the filter and read and record the pressure drop once per shift (§63.745(g)(2)(iv)(C))
- 4) Take corrective action when the pressure drop exceeds or fall below the filter manufacturer's recommended limit(s). (§63.745(g)(2)(iv)(D))
- 5) If the pressure drop across the dry particulate filter system, as recorded pursuant to §63.752(d)(1), is outside the limit(s) specified by the filter manufacture or in locally prepared operating procedures, shut down the operation immediately and take corrective action. (§63.745(g)(3))
- 6) Dry particulate filters used to comply with §63.745(g)(2) or §63.746(b)(4) must be certified by the filter manufacturer or distributor, paint/depainting booth supplier, and/or the facility owner or operator using method 319 in appendix A of subpart A of Part 63, to meet or exceed the efficiency data points found in Tables 1 and 2 of §63.745 for existing sources. (§63.750(o))
- 7) The permittee who uses a dry particulate filter system to meet the requirements of §63.745(g)(2) shall, while primer or topcoat applications are occurring, continuously monitor the pressure drop across the system and read and record the pressure drop once per shift following recordkeeping requirements of §63.752(d) (Record Keeping requirements for Inorganic HAP Control). (§63.751(c)(1))

Record Keeping:

- 1) Primers and Topcoats – The permittee shall record the following information: (§63.752(c))
 - a) The name and VOC content as received and as applied of each primer and topcoat used at the facility. (§63.752(c)(1))
 - b) Each owner or operator of an aerospace manufacture and/or rework operation that applies coatings listed in Emission Limitation 1.a. through 1.d of this permit condition shall-
 - i) Maintain a current list of coatings in use with category and VOC content as applied;
 - ii) Record each coating volume usage on a monthly basis; and,
 - iii) Maintain records of monthly volume-weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating averaging under Emission Limitation 1.c} of this permit condition.

- c) For “low HAP content” uncontrolled primers with organic HAP content less than or equal to 250 g/l (2.1 pounds per gallon) less water as applied and VOC content less than or equal to 250 g/l (2.1 pounds per gallon) less water and exempt solvents as applied: (§63.752(c)(3))
 - i) Annual purchase records of the total volume of each primer purchased (§63.752(c)(3)(i))
 - ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the organic HAP and VOC content as applied. These records shall consist of the manufacturer’s certification when the primer is applied as received, or the data and calculations used to determine H_i if not applied as received. (§63.752(c)(3)(ii))
- d) For primers and topcoats complying with the organic HAP or VOC content level by averaging: (§63.752(c)(4))
 - i) The monthly volume-weighted average masses of organic HAP emitted per unit volume of coating as applied (less water) (H_a) and of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G_a) for all coatings (as determined by the procedures specified in §63.750(d) and (f)) (§63.752(c)(4)(i))
 - ii) All data, calculations and test results (including EPA Method 24 results) used to determine the values H_a and G_a . (§63.752(c)(4)(ii))
- 2) Inorganic HAP Control.
 - a) For control of emissions complying with §63.745(g) through the use of a dry particulate filter system or a HEPA filter system, record (either electronically or manually) the pressure drop across the operating system once each shift during which aerospace production primer or topcoat containing inorganic HAP operations occur. (§63.752(d)(1))
 - i) For this provision, a shift is defined as an eight (8) hour period.
 - ii) The pressure drop records are deemed to be complete if 95% of the readings are recorded for all of the booths subject to this rule in any six (6) month period. If the last reading recorded correctly prior to any group of missed readings and the first reading recorded correctly after the same group of missed readings are both below the pressure drop limit, the missed readings are deemed to be below the pressure drop limit.
 - b) This log shall include the acceptable limit(s) of pressure drop, the booth manufacturer recommended parameter(s) that indicate the booth performance, as applicable, as specified by the filter or booth manufacturer or in locally prepared operating procedures. (§63.752(d)(3))

Reporting:

The permittee shall submit semiannual reports that identify: (§63.753(c)(1))

- 1) Where compliance is not being achieved through the use of averaging or control device, each value of H_i and G_i , a recorded under §63.752(c)(2)(i), that exceeds the applicable organic HAP or VOC content limit specified in §63.745(c). (§63.753(c)(1)(i))
- 2) Where compliance is achieved through the use of averaging, each value of H_a and G_a , as recorded under §63.752(c)(4)(i), that exceeds the applicable organic HAP or VOC content limit specified in §63.745(c). (§63.753(c)(1)(ii))
- 3) All times when a primer or topcoat application was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system was outside the (§63.753(c)(1)(i)) limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. (§63.753(c)(1)(vi))
- 4) If the operations have been in compliance for the semiannual period, (provide) a statement that the operations have been in compliance with the applicable standards. (§63.753(c)(1)(vii))
- 5) The permittee shall submit annual reports listing the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer or in locally prepared operating procedures. (§63.753(c)(2))

- 6) Semiannual reports are due by: October 1st for monitoring which covers the January through June time period; and, April 1st for monitoring which covers the July through December time period.

Boiler Group

FEDERAL							DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	10 CSR 10-5.030	40 CFR Part 60 Subpart Dc and 10 CSR 10-6.070: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	10 CSR 10-5.570, Control of Sulfur Emissions from Stationary Boilers	10 CSR 10-5.510 Control of Emissions of Nitrogen Oxide	Missouri Department of Natural Resources Construction Permit #	
CS-598-01	X	NA	X	NA	NA	NA ¹⁰	NG/Fuel Oil Boiler 20.92 MMBTU/hr
CS-598-02	X	NA	X	NA	NA	NA ¹¹	NG/Fuel Oil Boiler 20.92 MMBTU/hr
CS-STC-01	X	NA	NA	NA	NA	NA	Plant-wide NG Combustion <10MMBTU/hr
CS-508-01	X	NA	X	NA	NA	NA	NG/Fuel Oil Boiler 5.23 MMBTU/hr
CS-508-02	X	NA	X	NA	NA	NA	NG/Fuel Oil Boiler 5.23 MMBTU/hr
CS-598-03	X	NA	X	NA	NA	NA	NG/Fuel Oil Boiler 6.27 MMBTU/hr
CS-598-04	X	NA	X	NA	NA	NA	NG/Fuel Oil Boiler 6.27 MMBTU/hr
CS-599-02	X	NA	X	NA	NA	NA	NG/Fuel Oil Boiler 5.23 MMBTU/hr
CS-599-03	X	NA	X	NA	NA	NA	NG/Fuel Oil Boiler 5.23 MMBTU/hr

¹⁰ Construction permit 0997-007 did not place any requirements on this boiler.

¹¹ Construction permit 0997-007 did not place any requirements on this boiler.

Permit Condition Boiler Group-A
 10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds*

Emission Limitations:

- 1) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those in 10 CSR 10-6.010, *Ambient Air Quality Standards*.
- 2) Fuel oil burned at this facility must have a sulfur content of no greater than 2% from October through March and no greater than 4% for the rest of the year.
- 3) Propane and natural gas combustion have no requirements placed on them in this section.

Record Keeping:

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.

Permit Condition Boiler Group-B
 10 CSR 10-5.030 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

Emission Limitations:

These boilers have been determined to always comply with the most stringent emission limitation imposed by this rule, 0.10 pounds per million BTUs, with either natural gas or fuel oil as fuel. Therefore, this permit condition contains nothing more than this statement.

Group EG – Emergency Generators

EMISSION UNIT NUMBER	FEDERAL							DESCRIPTION (for information only, this does not create any permit requirements)
	10 CSR 10-5.510 Control of Emissions of Nitrogen Oxide	10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	1) 40 CFR Part 63, Subpart ZZZZ Greater than 500 HP Emergency Units	40 CFR Part 63, Subpart ZZZZ ≤ 500 HP Units	40 CFR Part 60, Subpart III	40 CFR Part 60, Subpart JJJJ	Missouri Department of Natural Resources Construction Permit #	
EG-508-01	NA	NA	NA	X	NA	NA	NA	330 HP NG Emergency Generator
EG-550-01	NA	X	NA	X	NA	NA	NA	200 HP Diesel Emergency Generator
EG-598-01	NA	NA	NA	X	NA	NA	NA	150 HP NG Emergency Generator
EG-598-02	NA	NA	NA	X	NA	NA	NA	200 HP NG Emergency Generator
EG-598-03	NA	X	NA	X	NA	NA	NA	465 HP Diesel Emergency Generator
EG-599-01	NA	NA	NA	X	NA	NA	NA	40 HP NG Emergency Generator

Permit Condition Group EG-A
10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds*

Emission Limitation:

No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) & 10 CSR 10-6.010 Ambient Air Quality Standards]

Operational Limitation:

This emission unit shall be limited to burning the natural gas supplied by Laclede Gas (or other natural gas service provider should a merger, sale or other transaction change the piped natural gas provider to the facility) or fuel oil number 2/diesel fuel.

Monitoring:

The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.

Record Keeping:

The permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.

Permit Condition Group EG-B
40 CFR Part 63, Subpart ZZZZ ($\leq 500\text{HP}$) - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The facility must comply with the following requirements no later than May 3, 2013, for applicable Compression Ignition units and no later than October 19, 2013, for applicable Spark Ignition units.

Operational Limitation:

- 1) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time follow the monitoring requirements below. [40 CFR Part 63.6625(h)]
- 2) Operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or operator-developed maintenance plan, which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR Part 63.6625(e)]
- 3) Install a non-resettable hour meter if one is not already installed. [40 CFR Part 63.6625(f)]
- 4) Maintenance checks and readiness testing of such units is limited to 100 hours per year [40 CFR Part 63.6640(f)(1)(ii)]
- 5) The facility may operate its emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours have usage limitations per 40 CFR Part 63.6640 (f)(1)(iii) and include 15 emergency demand response hours annually, which are also subject to usage limitations. [40 CFR Part 63.6640(f)(1)(iii)]

Monitoring:

- 1) Change oil and filter every 500 hours of operation or annually, whichever comes first;

- 2) (Alternatively, utilize an oil analysis program as described in § 63.6625(i) in order to extend the specified oil change requirement in Table 2c of this subpart.) [40 CFR Part 63, Subpart ZZZZ Table 2c]
- 3) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first for applicable Compression Ignition units. [40 CFR Part 63, Subpart ZZZZ, Table 2c]
- 4) Inspect spark plugs every 1,000 hours or annually, whichever comes first for applicable Spark Ignition units. [40 CFR Part 63, Subpart ZZZZ, Table 2c]
- 5) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR Part 63, Subpart ZZZZ, Table 2c]

Record Keeping:

- 1) The facility must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that it operated and maintained the stationary RICE according to its own maintenance plan [40 CFR Part 63.6655(e)]
- 2) Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR Part 63.6655(f)]

Reporting:

- 1) For each deviation from an emission or operating limitation or monitoring requirements that occurs for a stationary RICE, the Semi-Annual Monitoring Reports must also contain the following information: [40 CFR Part 63.6650(d)]
 - a) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [40 CFR Part 63.6650(d)(1)]
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [40 CFR Part 63.6650(d)(2)]

Group OV – Painting Area

FEDERAL			DESCRIPTION (for information only, this does not create any permit requirements)
EMISSION UNIT NUMBER	10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	MISSOURI Department of Natural Resources Construction Permit #	
MB-598-02	X	NA	Vented paint mixing area
OV-598-01	NA	0396-022	Spray Booth Oven (aerospace production)
OV-598-02	NA	0396-022	Spray Booth Oven (aerospace production)

Permit Condition Group OV-A
10 CSR 10-5.295 *Control of Emissions from Aerospace Manufacturing and Rework Facilities*

Emission Limitation:

- 1) The permittee shall not cause, permit, or allow the emissions of volatile organic compounds (VOC) from the coating of aerospace vehicles or components to exceed:
 - a) For Specialty Coatings: The VOC content limits listed in Appendix B (Table 1 of 10 CSR 5.295) expressed in pounds per gallon of coating, excluding water and exempt solvent, delivered to a coating applicator that applies specialty coatings;
 - b) For Primers: Shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
 - c) For Topcoats: Shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
 - d) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits.
 - i) The application of low solvent coating technology where the monthly volume-weighted average VOC content of each specified coating type meets the specified applicable limitation expressed in pounds (grams) of VOC per gallon (liter) of coating, excluding water and exempt solvents, averaging is not allowed for specialty coatings, and averaging is not allowed between primers, topcoats (including self-priming topcoats), Type I milling maskants, and Type II milling maskants or any combination of the above coating categories;

Monitoring/Record Keeping:

- 1) The permittee that applies coatings listed in 10 CSR 10-5.295(3)(A) shall-
 - a) Maintain a current list of coating in use with category and VOC content as applied;
 - b) Record each coating volume usage on a monthly basis; and
 - c) Maintain records of monthly volume-weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating averaging under 10 CSR 10-5.295(3)(B)2. .
- 2) All records must be kept on-site for a period of five (5) years and made available to the Department upon request.

Permit Condition Group OV-B
10 CSR 10-6.060 *Construction Permits Required Construction Permit #0396-022A (Special Condition 1, 2 and 3)*

Emission Limitation:

The total combined emissions of VOC shall be limited to 77.95 tons in any consecutive 12-month period.

Monitoring/Record Keeping:

The permittee shall record both the monthly and 12-month totals.

Reporting:

No later than ten (10) days after the end of each month, the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, if the 12-month cumulative total exceeds the emission limitation. This report does not have to be signed by the responsible official.

IV. Core Permit Requirements

This section lists excerpts from applicable regulations. The installation is responsible for complying with the cited portions of the regulations as found in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) to the extent they are consistent with the provisions in this permit. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.045 Open Burning Restrictions-State Only Enforceable

The applicable portions of this regulation are: (1), (2), (3)(A)1., (3)(A)2., (3)(A)3.D., (3)(A) 4., (3)(A)5.D., (3)(A)6., (3)(A)7., (3)(A)8., (3)(A)9., (3)(B)1., (3)(B)2., (3)(D), (3)(E), (4), (5)

Emission Limitations:

No person may conduct, cause, permit, or allow the disposal of tires, petroleum-based products, trade waste, construction or demolition waste, salvage operation waste, or asbestos containing materials by open burning, except as permitted by 10 CSR 10-6.045, which provides for open burning permits in certain cases, and conditionally exempts fires set for the purposes of training fire fighters and industrial employees in firefighting methods.

Recordkeeping Requirements: None

Monitoring Requirements: None

Reporting Requirements: None

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions- Federally Enforceable

The entire regulation is applicable.

Emission Limitations: None

Recordkeeping Requirements:

- 1) Information regarding the type and amount of emission and time of SSM episodes that resulted in excess emissions shall be recorded and kept on file. This data shall be included in emission reported on any required Emissions Inventory Questionnaire.
- 2) Information submitted in accordance with this rule shall be kept on file at the installations for a period of five years and made available to the Missouri Department of Natural Resources, or its designated agent, upon request.

Monitoring Requirements: None

Reporting Requirements:

- 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 10 days prior to any maintenance, start-up or shutdown, which is expected to cause an excess release of emissions that exceed one hour. If notice of the event cannot be given 10 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 in writing within 2 business days of the release. This notification is not required to be signed or certified by responsible official.
 - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
 - 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
 - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.
 - 6) Any reports required by this rule are not required to be signed or certified by the Responsible Official.

10 CSR 10-6.060 Construction Permits Required- Federally Enforceable

The entire regulation is applicable.

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. Exemptions under 10 CSR 10-6.061 apply.

10 CSR 10-6.065 Operating Permits- Federally Enforceable

The applicable portions of this regulation are: (1), (2), (3), (6), and (7). See the General Permit Requirements Section for more detail.

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [§6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [§(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [§(6)(C)3.B]

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

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. The applicable requirements of Subpart M are 40 CFR 61.140, 61.141, 61.143, 61.145, 61.146, 61.148, 61.150, 61.152, 61.153, 61.157, and Appendix A to Subpart M of Part 61.

10 CSR 10-6.100 Alternate Emission Limits- State Only Enforceable

This entire regulation is applicable.

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the Department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits become effective.

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

The entire rule is applicable. Reporting frequency is as described for an installation required to obtain a Part 70 Operating Permit.

Emission Limitations: None

Recordkeeping Requirements:

The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.

Monitoring Requirements: None

Reporting Requirements:

- 1) 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.
- 2) The fees shall be due on the date specified by 10 CSR 10-6.110(3)(D)F each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential- Federally Enforceable

The applicable portions of this regulation are: (1), (2), (3)(D), (3)(E), and (4).

Emission Limitations: 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.

Recordkeeping Requirements: None

Monitoring Requirements: None

Reporting Requirements: The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention- Federally Enforceable

The entire rule is applicable.

Emission Limitations: 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.

Recordkeeping Requirements: None

Monitoring Requirements: None

Reporting Requirements: None

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin- Federally Enforceable

The entire regulation is applicable.

Emission Limitations:

- 1) The permittee shall not cause or allow any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Recordkeeping Requirements:

Should it be determined that noncompliance has occurred, the Director may require record keeping to assure compliance with reasonable control measures.

Monitoring Requirements:

Should it be determined that noncompliance has occurred, the Director may require monitoring to assure compliance with reasonable control measures.

Reporting Requirements:

Should it be determined that noncompliance has occurred, the Director may require reporting to assure compliance with reasonable control measures.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants- Federally Enforceable

The entire rule is applicable.

Emission Limitations: None

Recordkeeping Requirements: None

Monitoring Requirements:

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. Qualified personnel shall perform all tests.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

Reporting Requirements:

The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited- Federally Enforceable

The entire regulation is applicable.

Emission Limitations:

It shall be unlawful to operate any hand-fired fuel-burning equipment in the Saint Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

Recordkeeping Requirements: None

Monitoring Requirements: None

Reporting Requirements: None

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
(Contained in the federal State Implementation Plan, but is not a state regulation)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-6.165 Restriction of Emission of Odors-State Only Enforceable

Statewide odor rule 10 CSR 10-6.165 and rescission of 10 CSR 10-5.160 are effective Nov. 30, 2010.

The applicable portion of this regulation is: (3)).

Emission Limitations:

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 fifteen minutes apart within the period of one hour. Compliance is determined at a location outside the permittee's property boundary

Recordkeeping Requirements: None. Permittee does not operate a Class 1A Concentrated Animal Feeding Operation which would require preparation of an Odor Control Plan.

Monitoring Requirements: No monitoring required by the permittee. Measurements taken by Missouri Department of Natural Resources shall be made with a Nasal Ranger as manufactured by St. Croix Sensory Inc. or by a similar instrument of technique that will give substantially similar results, or as approved by the Department.

Reporting Requirements: None

10 CSR 10-5.450 Coating of VOC Emissions from Traffic Coatings- Federally Enforceable

The applicable portions of this regulation are: (1), (2), and (3).

Emission Limitations:

No person shall supply, sell, offer for sale, apply, or solicit the application of any traffic coating, which at the time of sale or manufacture contains more than 1.26 pounds VOC per gallon, excluding water, exempt compounds, and any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the Saint Louis metropolitan area without the approval of the staff director. All VOC-containing traffic coating materials shall be stored in closed containers when not in use. In use includes, but is not limited to, being accessed, filled, emptied, or repaired.

Recordkeeping Requirements: None

Monitoring Requirements: None

Reporting Requirements: None

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements- State Only Enforceable

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone- Federally Enforceable

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee imports, or exports a class I or class II substance, the permittee is subject to the import and export requirements specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls. The permittee currently does not manufacture or transform Class I or Class II substances, so the inapplicable portions of Part 82, Subpart A are described in the Statement of Basis.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is not prohibited in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage- Federally Enforceable

The entire regulation is applicable.

- 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

This section lists excerpts from applicable regulations. The permittee is responsible for complying with the cited portions of the regulations as found in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) to the extent they are consistent with the provisions in this permit. 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 Monitoring and related 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) Semiannual Monitoring Reports
 - i) The permittee shall submit a semiannual report by:
 - (1) October 1st for monitoring which covers the January through June time period, and
 - (2) April 1st for monitoring which covers the July through December time period.
 - ii) Each semiannual monitoring report must identify any deviations from permit requirements since the previous report that have been monitored by the monitoring systems required under the permit, and any deviation from the monitoring, record keeping and reporting requirements of the permit.
 - iii) These reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
 - b) Supplemental Reports
 - i) Submit supplemental reports as indicated below. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - (1) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two (2) 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.
- (2) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - (3) Any other deviations identified in the permit as requiring more frequent reporting than the annual report shall be reported on the schedule specified in this permit.
- c) Every report submitted shall contain a certification by a responsible official of truth, accuracy and completeness (unless otherwise specified in this permit), 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.
 - d) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(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)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official, unless otherwise specified in this permit.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;

- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

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

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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, 901 North 5th Street, Kansas City, KS 66101, 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)12 Responsible Official

The application (or its amendments) identifies Stephen M. Jacques, Vice President Operations and St. Louis Site Manager, (with alternate signatories Michael J. Dwyer or David A. Thole) as the responsible official for this installation. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) 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,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
or
- 5) 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.

10 CSR 10-6.065 (6)(E)2. Application Shield

If the permittee submits a timely and complete application for permit renewal, the installation's failure to have an issued permit shall not be a violation of the requirement to have the permit until the permitting authority takes final action on the application. This application protection shall cease to apply if the applicant files an application that the permitting authority determines is not complete, or if, subsequent to a completeness determination, the applicant fails to submit, by the deadline specified in writing by the permitting authority, any additional information identified as being reasonably required to process the application. Permitting authority completeness determination and notification are detailed in 10 CSR 10-6.065(6)(B)1.B.

10 CSR 10-60.065 (6)(E)3. Permit Renewal and Expiration

The installation's right to operate shall terminate upon the expiration of the permit, unless a complete permit renewal application is submitted at least six (6) months before the date of expiration, or unless the permitting authority takes final action approving an application for a permit renewal by the expiration date. If a timely and complete application for a permit renewal is submitted, but the permitting authority fails to take final action to issue or deny the renewal permit before the end of the term of the previous permit, the previous permit shall not expire until the renewal permit is issued or denied. Any permit shield granted under the previous permit shall continue in effect during this period of time.

VI. Appendices

Appendix A

Closed Container Equivalency Determination Maintenance Plan

Maintenance Program and Record Keeping for Flip-Top Bottles when not In Use, which is equivalent (per 40 CFR 63 Subpart GG, §63.744(a)(4)) to the storage of aerospace cleaning solvent in flip-top bottles with their flip-tops in the down position (a closed container) per 40 CFR 63 Subpart GG, §63.744(a)(2).

This maintenance program shall consist of:

A training session once each year for all employees that perform hand-wipe solvent cleaning, per 40 CFR 63 Subpart GG and 10 CSR 10-5.295, "Control of Emissions From Aerospace Manufacture and Rework Facilities". This training shall instruct employees that flip-top bottles should be down when not in use and shall be documented including a list of trained employees which is kept for five years.

A monitoring program shall be initiated and maintained. Boeing personnel will conduct a walk-through of areas at each facility where regulated hand-wipe cleaning operations are routinely conducted and record the number of observed open and not in-use ("not closed") flip-top bottles per facility. Boeing personnel will then calculate the percentage of bottles that were open and not in-use ("not closed") for each facility. With this a monitoring improvement program shall be initiated with successive audits conducted for each facility according to the following schedule based on the results of the previous period's set of audits:

- If the percent of bottles found not closed is greater than 2.0% in the facility, then an audit must be performed within the next quarter.
- If the percent of bottles found not closed is between 1.0% and 2.0% in the facility, then an audit must be performed within the next six months.
- If the percent of bottles found not closed is between 0.5% and 1.0% in the facility, then an audit must be performed within the next year.
- If the percent of bottles found not closed is less than 0.5% in the facility, then an audit must be performed within the next two years.

The time period for performing each audit begins at the end of the quarter in which the previous audit was performed.

Two consecutive audits resulting in greater than 2.0% of flip-top bottles found not closed, will result in non-compliance with this maintenance program, and thus, non-compliance with 40 CFR §63.744(a)(2) and (a)(4).

The bottles subject to this maintenance program shall have flip-top caps, and have an opening no larger than 0.012868 square inches of area (which is equivalent to 0.128 inch diameter).

Appendix B

Specialty Coating VOC Limitations from 10 CSR 10-5.295

	Pounds per Gallon	Grams per Liter
Ablative Coating	5.0	600
Adhesion Promoter	7.4	890
Adhesive Bonding Primers:		
Cured at 250°F or below	7.1	850
Cured above 250°F	8.6	1030
Adhesives:		
Commercial Interior Adhesive	6.3	760
Cyanoacrylate Adhesive	8.5	1020
Fuel Tank Adhesive	5.2	620
Nonstructural Adhesive	3.0	360
Rocket Motor Bonding Adhesive	7.4	890
Rubber-Based Adhesive	7.1	850
Structural Autoclavable Adhesive	0.5	60
Structural Non-Autoclavable Adhesive	7.1	850
Antichafe Coating	5.5	660
Bearing Coating	5.2	620
Caulking and Smoothing Compounds	7.1	850
Chemical Agent-Resistant Coating	4.6	550
Clear Coating	6.0	720
Commercial Exterior Aerodynamic Structure Primer	5.4	650
Compatible Substrate Primer	6.5	780
Corrosion Prevention Compound	5.9	710
Cryogenic Flexible Primer	5.4	645
Cryoprotective Coating	5.0	600
Dry Lubricative Material	7.3	880
Electric or Radiation-Effect Coating	6.7	800
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	6.7	800
Elevated Temperature Skydrol Resistant Commercial Primer	6.2	740
Epoxy Polyamide Topcoat	5.5	660
Fire-Resistant (interior) Coating	6.7	800
Flexible Primer	5.3	640
Flight Test Coatings:		
Missile or Single Use Aircraft	3.5	420
All Others	7.0	840
Fuel-Tank Coating	6.0	720
High-Temperature Coating	7.1	850
Insulation Covering	6.2	740
Intermediate Release Coating	6.3	750
Lacquer	6.9	830
Maskant:		
Bonding Maskant	10.3	1230
Critical Use and Line Sealer Maskant	8.5	1020
Seal Coat Maskant	10.3	1230
Metalized Epoxy Coating	6.2	740
Mold Release	6.5	780
Optical Anti-Reflective Coating	6.3	750
Part Marking Coating	7.1	850
Pretreatment Coating	6.5	780
Rain Erosion-Resistant Coating	7.1	850

	Pounds per Gallon	Grams per Liter
Rocket Motor Nozzle Coating	5.5	660
Scale Inhibitor	7.3	880
Screen Print Ink	7.0	840
Sealants:		
Extrudable/Rollable/Brushable Sealant	2.3	280
Sprayable Sealant	5.0	600
Silicone Insulation Material	7.1	850
Solid Film Lubricant	7.3	880
Specialized Function Coating	7.4	890
Temporary Protective Coating	2.7	320
Thermal Control Coating	6.7	800
Wet Fastener Installation Coating	5.6	675
Wing Coating	7.1	850

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 9, 2003; amended October 14, 2009, and subsequent correspondence.
2. 2008 Emissions Inventory Questionnaire
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4. Part 70 Operating Permit, OP1999-052
5. Letter 464C-BSS-4845 sent by Bret Spoerle of the McDonnell Douglas Corporation, a wholly subsidiary of The Boeing Company on November 12, 1999.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time. In addition, plant-wide conditions or emission unit descriptions of the operating permit may list individual items of non-applicability.

1. 10 CSR 10-6.240, *Asbestos Abatement Projects-Registration, Notification and Performance Requirements*
This rule has not been included in the operating permit because the rule was struck down in the Cole County circuit court.
2. 10 CSR 10-5.120 *Information on Sales of Fuels to be Provided and Maintained*
This rule is not included since Boeing neither delivers nor receives coal or residual oil. Residual oil is not #2 fuel oil or diesel fuel.
3. 10 CSR 10-5.160, *Control of Odors in the Ambient Air*
This rule is rescinded effective November 30, 2010.
4. 40 CFR Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
5. 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*
This regulation does not apply to this facility.
6. 10 CSR 10-5.130, *Certain Coals to Be Washed*. The facility does not import, sell, offer for sale, expose for sale, exchange, deliver or transport coal for use and consumption.
7. 10 CSR 10-5.240, *Additional Air Quality Control Measures May be Required When Sources are Clustered in a Small Land Area*. The facility is not located in a small land area as defined by the rule.
8. 10 CSR 10-5.370, *Control of Emissions from the Application of Deadeners and Adhesives*, the facility is not an automotive manufacturer as required to be subject to the rule.
9. 10 CSR 10-5.455, *Control of Emission from Solvent Cleanup Operation*. The facility emits less than 500 pounds per day of VOCs from any non-exempt solvent cleanup operations. In addition, cleaning operations subject to the Aerospace NESHAP are exempt according to Section (C)7.
10. 10 CSR 10-5.500, *Control of Emissions from Volatile Organic Liquid Storage*, all storage vessels that meet the requirements of this rule are either subject to or exempt from the requirements of 40 CFR Parts 60, 61, or 63 and are therefore exempt from this rule according to Section (1)(B)7.

11. 10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions From Existing Major Sources*, does not apply to this facility because the facility is subject to one or more rules under Title 10, Chapter 5 of the Code of State Regulations (CSR) for volatile organic compound (VOC) emissions from a product process, or a raw material, intermediate or product tank.
12. 10 CSR 10-5.540, *Control of Emissions From Batch Process Operations*, does not apply because the facility does not operate any batch operations that have the potential to emit 100 tons/year of VOCs, nor do they have any operations within the SIC codes listed in the rule.
13. 10 CSR 10-5.570 *Control of Sulfur Emissions From Stationary Boilers*, does not apply to this facility because emission units are not subject to this rule per *10 CSR 10-5.570 (1) (C)6* since the boilers operate exclusively on natural gas and #2 fuel oil with less than 0.5% sulfur.

Construction Permit Revisions

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

1. Construction Permit #0396-014A
This construction permit was issued as being applicable to emission units CC-598-02 and CC-598-03. In a letter dated November 12, 1999, the permittee informed Air Pollution Control Program (APCP) these units had been removed and replaced with emission unit CC-505-01. On February 8, 2000, the Air Pollution Control Program responded in an amendment letter approving the reclassification of both CC598-02 and CC598-03 to CC505-01. Further, the letter states that construction permit #0396-014 would not be modified, but the revisions would be made in the operating permit upon renewal. The letter was labeled as construction permit #0396-014A. The operating permit has been written with construction permit #0396-014 applying to CC-505-01.
2. Construction Permit #0396-014
Special condition 4 was included in construction permit #0396-014 instructing the permittee to remove vapor degreaser (VD) 500-02, VD 500-03, VD 500-04, and VD 500-05. The permittee has removed this equipment. Therefore, the permit condition has not been included in the operating permit.
3. Construction Permit #0396-014
Special condition 5 lists emission units that had been removed from the installation before the issuance of construction permit #0396-014. Since the units had been removed and are no longer at the installation, special condition 5 has not been included in the operating permit.
4. Construction Permit #0396-022A
The original construction permit was written to include the Mixing Paint Booth, the Drying Rack, Ovens OV-598-03 through OV-598-05, the ink stamping process, the conformal coating process, and various soldering processes, in Special Condition 1. All of these emission units have been removed from the installation and are no longer subject to this construction permit. Boeing informed Air Pollution Control Program about the removal of these emission units in a letter dated November 12, 1999. On February 8, 2000, Air Pollution Control Program sent a letter indicating that construction permit #0396-022 would not be modified. However, the letter further states that the revisions to remove these units will be completed in the operating permit renewal. This amendment letter was labeled Construction Permit #0396-022A. All references to these units have been removed from the operating permit. Special Condition 1 has been revised to identify the units that are in use at the installation.
Special Condition 1 of Construction Permit #0396-022 states that the permit should apply to all Secret Coating Booths SB598-01 through SB598-09 inclusive. This range would then include the Spray Booths labeled as SB598-06 and SB598-07. However, under the *Applicable Requirements* section of Construction Permit #0396-022, the spray booths to which the construction permit applies

to are listed as SB598-01 through SB598-05, SB598-08, SB598-09, and SB599-01. Since SB598-06 and SB598-07 are not on this list, Construction Permit #0396-022 is not applicable to these emission units.

New Source Performance Standards (NSPS) Applicability

1. Subpart Dc, "Small Industrial – Commercial – Institutional Steam Generating Units." The boilers that are greater than 10 MMBTU/hr have not been constructed, modified, or reconstructed after June 9, 1989.
2. Subparts K and Ka, "Storage Vessels for Petroleum Liquids after June 11, 1973" and "Storage Vessels for Petroleum Liquids." There are no "petroleum liquid" storage tanks with capacity greater than 40,000 gallons (Fuel oils # 2 through 6 and diesel fuel # 2-D and 4-D are exempt from the definition of "Petroleum Liquids").
3. Subpart Kb, "Storage Vessels for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." There are not storage vessels subject to this regulation since the storage tanks are less than 19,813 gallons or are empty and out of service.
4. 40 CFR Part 60, Subpart IIII- *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*
This subpart is not applicable, since none of the compression ignition RICE commenced construction after July 11, 2005.
5. 40 CFR Part 60, Subpart JJJJ- *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*
This subpart is not applicable, since none of the spark ignition RICE commenced construction after June 12, 2006.

Maximum Achievable Control Technology (MACT) Applicability

1. 40 CFR Part 63, Subpart GG- *National Emission Standards for Aerospace Manufacturing and Rework Facilities*
Since the installation is an aerospace manufacturer, this subpart is applicable.
As provided by 40 CFR §§63.10(a)(5), 63.9(i), and 40 CFR §63.753(a)(3). The General Provisions to the NESHAP regulations provide:
 - a. If an owner or operator of an affected source in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such source under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State...Procedures governing the implementation of this provision are specified in §63.9(i).
The current Aerospace NESHAP reporting periods resulted from the timing of the implementation of 40 CFR Part 63, Subpart GG and the May 1, 1999 due date of the Initial Notification of Compliance Status submittal required by that regulation and the General Provisions (40 CFR §63.9(h)). Semi-Annual reports thereafter are due on November 1 (for reporting periods covering March 1 through August 31) and May 1 (for reporting periods covering September 1 through February 28) of each year. Annual reports are due May 1 (for the March 1 through February 28 reporting periods) of each year. On February 7, 2000, Boeing requested permission to align the Aerospace NESHAP with the Title V reporting periods and submission dates as follows:

- i. *Due on April 1 of each year: Title V Annual Compliance Certification and Aerospace NESHAP Annual Report, for the period of January through December.*
 - ii. *Due on April 1 of each year: Title V Semi-annual Monitoring Report and Aerospace NESHAP Semi-annual Report, for the period of July through December.*
 - iii. *Due on October 1 of each year: Title V Semi-annual Monitoring Report and Aerospace NESHAP Semi-annual Report, for the period of January through June.”*
 - iv. On March 21, 2000, the Air Pollution Control Program accepted the alignment schedule for the Title V and Aerospace.
- b. A control system is defined in 40 CFR Part 63, Subpart GG as a combination of pollutant capture system(s) and control device(s) used to reduce discharge to the atmosphere of organic HAP or VOC emissions generated by a regulated operation. The emission units are equipped with fabric filters that are control devices. The fabric filters are only used for the removal of particulate matter and inorganic HAP material. The fabric filters are not set up as a capture system that would be defined as a control system. The HAP emissions that are captured by the control devices are inorganic HAPs, which are not required to have a control system that reduces emissions to the atmosphere. 40 CFR Part 63, Subpart GG only requires that a required 81% reduction of emissions to the atmosphere from organic HAPs and VOC which are controlled by a control system. The organic HAPs and VOC emissions are uncontrolled and not subject to either a control device or control system. Therefore, the installation does not have a control system and would not be subject to the requirements under §63.745(d).
- c. *Permit Condition PW-03*: This permit condition is an Alternate Operating Scenario and only applies when seven or more completed aircraft are depainted in a calendar year (under current conditions there are no applicable requirements for these units). The mechanical depainting portions of the permit condition only apply to the plastic and abrasive media blasters. The abrasive media blasters (GB-598-02 and GB-599-01) are out of service.
- d. The requirements from §63.746(b)(4) have been included in Permit Condition PW-03 since the permittee does dry media blasting. Since the permittee uses a baghouse for control and not a dry particulate system, the requirements from §63.746(b)(4)(iii) for a dry particulate system have not been included in the permit condition. Additionally, the requirements for §63.746(b)(4)(iv) have not been included, since the permittee does not utilize a water wash system. §63.746(b)(4)(v) deals with the compliance methods for a dry particulate system and a water wash system. Since the permittee uses a baghouse, §63.746(b)(4)(v) is not applicable to the installation. Since the installation does not have a control system, the requirements from §63.746(c) are not applicable to the installation. The requirements of §63.752(e)(2) are not applicable to the installation since the installation does not have a carbon absorber. Since the installation does not have a control system, the requirements from §63.752(3) are not applicable to the installation. The requirements of §63.752(e)(7) are not applicable to the installation since the regulation is for particulate filters and water wash systems, neither of which is utilized by the installation. Since §63.753(d)(1)(vii) and §63.753(d)(2)(ii) deals with parameters that are consistent with dry particulate filters and water wash systems and since the installation does not use either system, the requirements from this regulation has not been included in the operating permit.
- e. Cold Cleaners are used by the permittee to clean electronic parts. The cleaning of electronic parts are exempted from the requirements of §63.744(b), *Hand-wipe cleaning*, by §63.744(e)(4). The cold cleaners would be subject to §63.744 of 40 CFR Part 63, Subpart GG. §63.744 are the standards for Cleaning Operations. However, the cold cleaners do not fit the definition of the Cleaning Operations. Under §63.742, the definition of Cleaning Operations is spray gun, hand-wipe, and flush cleaning operations. Since the cold cleaners do not fit the definition of Cleaning

Operations, §63.744 is not applicable. Therefore, 40 CFR Part 63, Subpart GG does not apply to the Cold Cleaners.

- f. The Aerospace NESHAP, 40 CFR Part 63, Subpart GG, Sec. 63.743(b) requires the permittee to prepare a Startup, Shutdown, and Malfunction (SSM) Plan for operations that use "an air pollution control device or equipment to control HAP emissions", but specifically excludes "dry particulate filter systems operated per the manufacturer's instructions." With the exception of the Alternate Operating Scenario for mechanical depainting, none of the other activities at this site regulated by the Aerospace NESHAP rely on air pollution control devices or equipment that require a SSM Plan under 40 CFR 63, Subpart GG.
 - g. The permittee is also required to do notification requirements which are required by 40 CFR 63.9 and 40 CFR 63.753(a)(1). The permittee has submitted the Notification of Compliance Status Report to the Director on April 12, 1999. In addition, the permittee submitted on September 9, 1999, a letter which contained changes to the information in the initial Notification of Compliance Status Report. These reports cover the requirements of §63.9 and §63.753(a)(1), therefore these regulations have not been included in the operating permit.
 - h. An initial notification report was also required by §63.753(a)(2). This report was submitted, by the permittee, to EPA Region VII on December 22, 1995. Therefore, the requirements of §63.753(a)(2) have not been included in the operating permit.
 - i. The requirements of this subpart do not apply to primers, topcoats, chemical milling maskants, strippers, and cleaning solvents containing HAP and VOC at concentrations less than 0.1 percent for carcinogens or 1.0 percent for noncarcinogens, as determined from manufacturer's representations. Primers and topcoats that contain organic HAP and VOC less than these thresholds are exempt from the application requirements of 40 CFR 63.745(f). Primers and topcoats that contain inorganic HAP less than these thresholds are exempt from the filtration requirements of 40 CFR 63.745(g). See applicability thresholds at 40 CFR 63.741(f).
 - j. §63.750 *Test methods and procedures*
This regulation provides methods for determining the vapor pressure of hand-wipe cleaning solvents. To further clarify these requirements, the vapor pressure of a blended hand-wipe solvent provided by the manufacturer that involves no mixing on site may be determined using the MSDS or other manufacturer's data, in lieu of a calculation, provided all components have been considered.
 - k. This facility currently uses VOC as a surrogate to comply with the rule and not the requirement listed in Recordkeeping 1.c of Permit Condition Group Spray Booths-B.
2. 40 CFR Part 63, Subpart T- *National Emission Standards for Halogenated Solvent Cleaning*
This regulation does not apply to this installation.
 3. 40 CFR Part 63, Subpart JJ- *National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations*
The installation is defined as being an incidental wood manufacturer. An incidental wood manufacture is a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. The only applicable requirement from 40 CFR Part 63, Subpart JJ is §63.800(a).
 4. 40 CFR Part 63, Subpart Q- *National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers*
40 CFR Part 63, Subpart Q applies to all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals on or after September 8, 1994 and are either major sources or are integral parts of facilities that are major sources. However, the permittee

does not operate the cooling towers with chromium-based water treatment chemicals. Therefore, this subpart is not applicable to the installation.

5. 40 CFR Part 63, Subpart ZZZZ - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
This subpart applies to stationary reciprocating internal combustion engines (RICE) that are not used for test cell/stand purposes. Emergency RICE greater than 500 HP are subject to NESHAP initial notification requirements only [40 CFR 63.6590(b)(1)(i)].
 - a. All engines at this facility are existing emergency stationary RICE and less than 500 HP. Under Subpart ZZZZ, "existing" stationary RICE engines less than or equal to 500 HP are those for which construction or reconstruction commenced before June 12, 2006 [40 CFR 63.6590(a)(1)(ii)]. EG-598-03 is out of service and will comply with subpart ZZZZ if/when it is ever put into service.
6. 40 CFR Part 63, Subpart EEEE, *Organic Liquids Distribution* does not apply to this installation. Organic liquids handled at this installation are within the rule exemptions for gasoline, fuel oil, diesel, and aviation fuel, fuels consumed or dispensed on-site directly to users, solvents subject to other NESHAPs, and low vapor pressure materials. (40 CFR 63.2238 and 63.2406)
7. 40 CFR Part 63, Subpart MMMM, *Miscellaneous Metal Parts (Surface Coating)* does not apply to coating operations subject to the Aerospace NESHAP per 63.3881(c)(10). All other coating operations at this facility are exempt according to other sections of the rule.
8. 40 CFR Part 63, Subpart PPPP, *Surface Coating of Plastic Parts* does not apply to this installation. Plastic substrates that are surface coated fall within rule exemptions for aerospace components that are within the applicability criteria for the Aerospace NESHAP, specialty coatings used on aerospace components, research and development, building and facility maintenance, and other exemptions described at 40 CFR 63.4481.
9. 40 CFR Part 63, Subpart WWWW, *Reinforced Plastic Composites Production* does not apply to this facility because they do not process styrene-containing materials.
10. 40 CFR Part 63, Subpart DDDDD, *Boilers/Process Heaters* did apply to the external combustion boilers that have a maximum rated capacity that exceeds the applicability threshold of the subpart (> 10 MMBtu/hr). However, this rule was vacated on July 30, 2007, and is therefore no longer applicable. If the MACT is repromulgated, Boeing will comply with the new requirements.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition parts of the subpart which makes the subpart applicable to all sources. It is included as a core permit requirement. Based on current activities at this facility, the following requirements of Subpart M do not apply: 40 CFR 61.142, 61.144, 61.147, 61.149, 61.151, 61.154, 61.155, and 61.156.

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units has pre-control emissions that exceed or are equivalent to the major source threshold. In correspondence to the agency, the installation indicated on February 11, 2002, that the installation does not have any emission units that would be subject to CAM. Since there are not any units to which CAM applies, the installation was not required to submit a CAM plan to the agency.

Other Regulatory Determinations

1. 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter for Fuel Burning Equipment Used for Indirect Heating.*

The most stringent emission limitations of particulate matter from this rule for new and existing indirect heating units are:

Existing: 0.12 pounds per million BTUs { 10 CSR 10-5.030(2)(B)3. }

New: 0.10 pounds per million BTUs { 10 CSR 10-5.030(3)(B)3. }

The boilers' emission factors (particulate matter emission rates) are:

Natural Gas: 0.0072 pounds per million BTUs¹²

Fuel Oil: 0.014 pounds per million BTUs¹³

This demonstrates that, regardless of the total facility heat input, regardless of either of the two fuel types listed, the permittee's boilers will always comply with 5.030.

2. 10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds, Part (3)(C)3.B.(I).*

The boilers' emission factors (emission rate of sulfur oxides) are:

Natural Gas: 0.000571 pounds per million BTUs¹⁴

Fuel Oil: 1.01 pounds per million BTUs¹⁵

The emergency generators' emission factors (emission rate of sulfur oxides) are:

Natural Gas: 0.000588 pounds per million BTUs¹⁶

Fuel Oil: 0.29 pounds per million BTUs¹⁷

This rule states at Part (3)(C)3.B.(II):

Part (3)(C)3.B.(I) of this rule shall not apply to any installation if it can be shown that emissions of sulfur dioxide from the installation into the atmosphere will not exceed two and three-tenths (2.3) pounds per million Btus of heat input to the installation.

As shown, both fuel types yield boiler and emergency generator emission rates less than the 2.3 pounds of sulfur dioxide per million Btus. Therefore, the permittee's boilers and generators are not subject to 6.260 Part (3)(C)3.B.(I).

3. 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*

¹² Based on 1,050 million Btus per million cubic feet of natural gas and an emission factor of 7.6 pounds of particulate matter per million cubic feet of natural gas.

¹³ Based on 140 million Btus per thousand gallons of distillate oil and an emission factor of 2.0 pounds of particulate matter per thousand gallons of distillate oil.

¹⁴ Based on 1,050 million Btus per million cubic feet of natural gas and an emission factor of 0.6 pounds of sulfur dioxide per million cubic feet of natural gas.

¹⁵ Based on 140 million Btus per thousand gallons of distillate oil and an emission factor of 142 pounds of sulfur dioxide per thousand gallons of distillate oil.

¹⁶ Based on an August 4, 2010 WebFIRE emission factor report for SCC code 2-02-002-53.

¹⁷ Based on Table 3.3-1 *EMISSION FACTORS FOR UNCONTROLLED GASOLINE AND DIESEL INDUSTRIAL ENGINES*, of EPA's AP-42 Chapter 3.3 *Gasoline And Diesel Industrial Engines*.

The installation is subject to 10 CSR 10-5.295, *Control of Emissions from Aerospace Manufacture and Rework Facilities*, but is no longer subject to 10 CSR 10-5.330.

4. 10 CSR 10-5.300, *Control of Emissions from Solvent Cleaning*
Emission unit CC-505-01 performs cold cleaning of electronic components. The cleaning of electronic equipment exempts it from this rule, under 5.300(1)(D):
 - (D) *Exemptions.*
 1. *The following shall be exempt from this rule:*
 - A. *Cold cleaners with liquid surface areas of one (1) square foot or less or maximum capacities of one (1) gallon or less;*
 - B. *Solvent cleaning operations that meet the emission control requirements of 10 CSR 10-5.295, 10 CSR 10-5.330, 10 CSR 10-5.340 or 10 CSR 10-5.442;*
 - C. *Solvent metal cleaning operations regulated under 40 CFR 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning;*
 - D. *The cleaning of electronic components, medical devices or optical devices;***
 - E. *Hand cleaning/wiping operations; and*
 - F. *Flush cleaning operations.*
5. In a letter dated March 20, 2000, the permittee notified the agency of the addition of an abrasive media blaster. The emission unit is controlled by a baghouse and the only regulated air pollutant from the unit is particulate matter. The emission of total particulate is less than 50 pounds per year. The permitting authority determined that the unit was not subject to any requirements under Title IV of the Clean Air Act and was also not a Title I modification. Therefore, this unit has not been included into the Operating Permit
6. 10 CSR 10-5.295, *Control of Emissions from Aerospace Manufacture and Rework Facilities*
Section 5.295(4)(A) requires a Monitoring Plan to be submitted to the Director, but this Monitoring Plan is required only for VOC control equipment such as incineration, carbon absorption, and condensation, described in 5.295(B)(3). Aerospace surface coating operations at this installation meet VOC emission limits of 5.295(3)(A) by use of compliant coatings, and not by use of VOC capture and control equipment described at 5.295(B)(3). If, in the future, VOC capture and control equipment is installed to meet 5.295(3)(A) limits, such equipment may be subject to the Monitoring Plan and VOC reduction efficiency requirements of this rule, if applicable at that time.
7. 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
The permittee will comply with the most stringent opacity limit in the rule, twenty percent (20%). This fact allows the plant-wide condition to simply identify that all sources of visible emissions are subject to the emission limitation, without providing a detailed list of stacks and vents. The primary stacks and vents (those emission units with other emission limitations) are identified in Enclosure 1, following this statement of basis. According to the rule requirements, Enclosure 2 identifies the “areas” of the facility where generalized opacity observations will occur.
8. 40 CFR Part 82, Subpart A, *Protection of Stratospheric Ozone, Production and Consumption Controls*
Based on representations by the applicant, the following 40 CFR Part 82, Protection of Stratospheric Ozone, Production and Consumption Controls Subpart A subsections do not currently apply to this installation: 40 CFR 82.5 through 82.13(f) and 40 CFR 82.17 through 82.24(b).
If at any time, the installation becomes subject to the above regulations they are responsible for contacting the Missouri Department of Natural Resources Air Pollution Control Program, and EPA Region VII to review and update the current permit.

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:

Randy E. Raymond
Environmental Engineer

Enclosure 1
 List of Stacks or Vents

FEDERAL		
Emission Point (Stack) Number	10 CSR 10-6.220: Restriction of Emission of Visible Air Contaminants	DESCRIPTION (for information only, this does not create any permit requirements)
CS-598-01	X	
CS-598-02	X	
CS-508-01	X	
CS-508-02	X	
CS-598-03	X	
CS-598-04	X	
CS-599-02	X	
CS-599-03	X	
CS-STC-01	X	
OV-598-01	X	
OV-598-02	X	
SB-598-01(03)	X	
SB-598-02(04)	X	
SB-598-03/04(05)	X	
SB-598-05(02)	X	
SB-598-06	X	
SB-598-10 (01)	X	
SB-599-06(01)	X	

Enclosure 2

Missouri – St. Charles

Tract V, North and South

2600 North 3rd Street, St. Louis, MO, 63301-0060

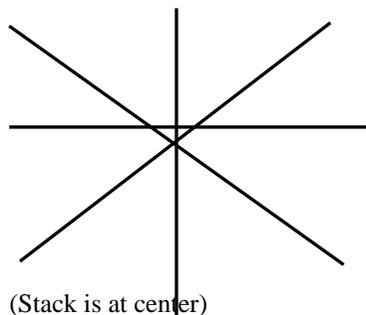


Visible Emission Method 9 Sample Observation Form

This compliance worksheet may be used to meet the record keeping requirements for Permit Condition PW-06. This form is only a sample and the actual recordkeeping could use a different format and/or heading titles

Source Name _____
 Address _____
 Observation Point _____
 Stack Identification _____
 Stack: Distance from _____ Height _____
 Temp _____ %RH _____
 Sky Condition _____
 Color of Emission _____

Quadrant: Draw symbols below in appropriate place to mark wind direction and speed, observer's location and sun location.



(Stack is at center)

Observer _____
 Observer's Signature _____

 Date _____ Certification Date _____
 Observation Began _____ Ended _____

COMMENTS:

	0	15	30	45		0	15	30	45
0					41				
1					42				
2					43				
3					44				
4					45				
5					46				
6					47				
7					48				
8					49				
9					50				
10					51				
11					52				
12					53				
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40					80				

Coating VOC/HAP Sample Record Form

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations - 40 CFR Part 63, Subpart GG

10 CSR 10-5.295 *Control of Emissions from Aerospace Manufacturing and Rework Facilities*

This compliance worksheet may be used to meet the record keeping requirements for Permit Condition Group Spray Booths - B. This form is only a sample and the actual recordkeeping could use a different format and/or heading titles

Paint type (primer, specialty coating, or topcoat)	Material name	Paint usage, gal	Paint VOC* (as Applied), gr/L

* VOC is used as a surrogate for organic HAP.

Pressure Drop Sample Record Form

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations - 40 CFR Part 63, Subpart GG

This compliance worksheet may be used to meet the record keeping requirements for pressure drop readings. This form is only a sample and the actual recordkeeping could use a different format and/or heading titles

Building	Booth	Date & Time	Shift	1 st Stage Reading*	1 st Stage Limit*	2nd Stage Reading*	2 nd Stage Limit*	3rd Stage Reading*	3rd Stage Limit*

*as applicable to each Method 319 compliant filter stage.

Depainting Sample Record Form

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations* - 40 CFR Part 63, Subpart GG
 Chemical Stripping Record Keeping Form

This compliance worksheet may be used to meet the record keeping requirements for Permit Condition PW-03. This form is only a sample and the actual recordkeeping could use a different format and/or heading titles

Stripper Used			
Compliance Method ³			
Material usage (Gallons or pounds of organic HAP)	Actual Volume of Stripper	Weight or of Organic HAP	Actual Volume of Stripper
			Weight or of Organic HAP
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
Yearly Total (gals or lbs of organic HAP)			
Average Volume of Organic HAP- Containing Spot Stripper or Weight of Organic HAP used per aircraft			

Depainting Sample Record Form

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations* - 40 CFR Part 63, Subpart GG
 Non-Chemical Paint Removal Record Keeping Form

This compliance worksheet may be used to meet the record keeping requirements for Permit Condition PW-03. This form is only a sample and the actual recordkeeping could use a different format and/or heading titles

Equipment Type				
Malfunction Information				
Malfunction and correction date	malfunctioned corrected	malfunctioned corrected	malfunctioned_ corrected_____	malfunctioned_____ corrected_____
Description of malfunction				
Alternative method used during malfunction				
Date alternative started and stopped	started stopped	started stopped	started_____ stopped_____	started_____ stopped_____

