Dear Paisley Matthews:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:NWj

Enclosures

PAMS File: 2014-12-048
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: OP2020-013
Expiration Date: APR 1 0 2025
Installation ID: 183-0010
Project Number: 2014-12-048

Installation Name and Address
The Boeing Company
2600 North Third Street
St. Charles, MO 63301
St. Charles County

Parent Company's Name and Address
The Boeing Company
100 North Riverside
Chicago IL, 60606

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. The installation is subject to 40 CFR part 63 Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities and has potential emission greater than operating permit major source thresholds for CO, NOx, SOx, VOC, and HAPs; and is therefore required to obtain a Part 70 operating permit.

APR 1 0 2020
Effective Date

Director or Designee
Department of Natural Resources
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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.

<table>
<thead>
<tr>
<th>Permit #</th>
<th>EIQ Point</th>
<th>Emission Unit No.</th>
<th>Location Column</th>
<th>Location</th>
<th>Manufacturer</th>
<th>Model</th>
<th>Year</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>HC-STC-01</td>
<td>CS-505-01</td>
<td>505</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>Spray Gun Cleaning Operations</td>
</tr>
<tr>
<td></td>
<td>CS-508-03</td>
<td>508</td>
<td>K</td>
<td>4</td>
<td>Futera Fusion</td>
<td>CB2000</td>
<td>2013</td>
<td>NG Boiler 2 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-508-04</td>
<td>508</td>
<td>K</td>
<td>4</td>
<td>Futera Fusion</td>
<td>CB2000</td>
<td>2013</td>
<td>NG Boiler 2 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-508-05</td>
<td>508</td>
<td>K</td>
<td>4</td>
<td>Futera Fusion</td>
<td>CB2000</td>
<td>2013</td>
<td>NG Boiler 2 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-508-06</td>
<td>508</td>
<td>K</td>
<td>4</td>
<td>Futera Fusion</td>
<td>CB2000</td>
<td>2013</td>
<td>NG Boiler 2 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-523-01</td>
<td>523</td>
<td></td>
<td></td>
<td>Raypack</td>
<td>WH10624</td>
<td>2020</td>
<td>NG Hot Water Boiler 0.63 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-540-01</td>
<td>540</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>NG Boiler &lt;1.6 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-540-02</td>
<td>540</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>NG Boiler &lt;1.6 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-550-01</td>
<td>550</td>
<td></td>
<td></td>
<td>Raypack</td>
<td>WH8-0992</td>
<td>2020</td>
<td>NG Hot Water Boiler 0.99 MMBTU/hr</td>
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<tr>
<td>0997-007</td>
<td>CS-598-01</td>
<td>598</td>
<td>K</td>
<td>L</td>
<td>17</td>
<td>25</td>
<td>1</td>
<td>Cleaver Brooks CB400-500 1985 NG/Fuel Oil Boiler 20.92 MMBTU/hr</td>
</tr>
<tr>
<td>0997-007</td>
<td>CS-598-02</td>
<td>598</td>
<td>K</td>
<td>L</td>
<td>17</td>
<td>25</td>
<td>1</td>
<td>Cleaver Brooks CB400-500 1985 NG/Fuel Oil Boiler 20.92 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-598-03</td>
<td>598</td>
<td>J</td>
<td>K</td>
<td>17</td>
<td>25</td>
<td>1</td>
<td>Cleaver Brooks CB400-150 1978 NG Boiler 6.2 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-598-04</td>
<td>598</td>
<td>J</td>
<td>K</td>
<td>17</td>
<td>25</td>
<td>1</td>
<td>Cleaver Brooks CB400-150 1978 NG Boiler 6.2 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-598-05</td>
<td>598</td>
<td>J</td>
<td>K</td>
<td>17</td>
<td>25</td>
<td>1</td>
<td>Cleaver Brooks M4P-1500 1985 NG Boiler 1.5 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-599-01</td>
<td>599</td>
<td>E</td>
<td>F</td>
<td>4</td>
<td>5</td>
<td>1</td>
<td>Cleaver Brooks CB400-125 1978 NG Boiler 5.2 MMBTU/hr</td>
</tr>
<tr>
<td></td>
<td>CS-599-02</td>
<td>599</td>
<td>E</td>
<td>F</td>
<td>4</td>
<td>5</td>
<td>1</td>
<td>Cleaver Brooks CB400-125 1978 NG Boiler 5.2 MMBTU/hr</td>
</tr>
<tr>
<td>Licence No.</td>
<td>Description</td>
<td>HP</td>
<td>Manufacturer</td>
<td>Model No.</td>
<td>Year of Installation</td>
<td>NP</td>
<td>Remarks</td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------</td>
<td>------</td>
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<td>----</td>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>CS-STC-01</td>
<td>Cleaver Brooks NG Boiler</td>
<td>1.5 MMBTU/hr</td>
<td>Plant-wide NG Combustion &lt;1.5MMBTU/hr</td>
<td></td>
<td>1982</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CS-STC-01</td>
<td>Katolight NG Emergency Generator</td>
<td>330 HP</td>
<td>508 H J 2 1</td>
<td>N190FRZ4</td>
<td>1983</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CS-STC-01</td>
<td>Kohler Diesel Emergency Generator</td>
<td>150 HP</td>
<td>598 J 2 1</td>
<td>100RZ72</td>
<td>1984</td>
<td></td>
<td></td>
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<tr>
<td>CS-STC-01</td>
<td>Caterpillar Diesel Emergency Generator</td>
<td>200 HP</td>
<td>598 L 2 1</td>
<td>3306S1</td>
<td>1984</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CS-STC-01</td>
<td>Marathon Diesel Emergency Generator-OOS</td>
<td>465 HP</td>
<td>598 J 33 1</td>
<td>502FDR804866-M500 W</td>
<td>1986</td>
<td></td>
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<td></td>
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<tr>
<td>CS-STC-01</td>
<td>Onan Diesel Emergency Generator</td>
<td>40 HP</td>
<td>599 D E 6 1</td>
<td>300EK15R/19045M</td>
<td>1979</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HC-STC-01</td>
<td>Plant-wide aerospace handwipe solvent cleaning building fugitives</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CL-STC-01</td>
<td>Paint Mixing Booth</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MC-STC-01</td>
<td>Chemical Depainting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0396-022</td>
<td>Spray Booth Oven (aerospace production)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0396-022</td>
<td>Spray Booth Oven (aerospace production)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2019-07-041</td>
<td>Spray Booth (aerospace production)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0396-022</td>
<td>Spray Booth (aerospace production)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0396-022</td>
<td>Spray Booth (aerospace production)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0396-022</td>
<td>Spray Booth (aerospace production)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

1 DP-STC-01 has Alternate Operating Scenarios that may apply.
2 MC-STC-01 has Alternate Operating Scenarios that may apply.
<table>
<thead>
<tr>
<th>Installation ID: 183-0010</th>
<th>Project No. 2014-12-048</th>
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### Spray Booth

<table>
<thead>
<tr>
<th>Installation ID</th>
<th>SB-Number</th>
<th>Model</th>
<th>Serial</th>
<th>Capacity</th>
<th>Equipment Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>0396-022</td>
<td>SB-598-05(02)</td>
<td>598</td>
<td>J</td>
<td>57</td>
<td>1 Spray Booth (aerospace production)</td>
</tr>
<tr>
<td>--</td>
<td>SB-598-06</td>
<td>598</td>
<td>Q</td>
<td>13</td>
<td>-- Spray Booth (specialty coatings)</td>
</tr>
<tr>
<td>0396-022</td>
<td>SB-598-10  (01)</td>
<td>598</td>
<td>K.1</td>
<td>45</td>
<td>1 DevilBiss Spray Booth (aerospace production)</td>
</tr>
<tr>
<td>0396-022</td>
<td>SB-599-06(01)</td>
<td>599</td>
<td>--</td>
<td>--</td>
<td>-- Spray Booth (aerospace production)</td>
</tr>
<tr>
<td>--</td>
<td>--</td>
<td>PW</td>
<td>--</td>
<td>--</td>
<td>-- Plant-wide Specialty Coatings</td>
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</tbody>
</table>

### Storage Tanks

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<tr>
<th>Installation ID</th>
<th>SB-Number</th>
<th>Model</th>
<th>Serial</th>
<th>Capacity</th>
<th>Location</th>
<th>Description</th>
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<tbody>
<tr>
<td>NONE</td>
<td>ST-598-01</td>
<td>598</td>
<td>--</td>
<td>--</td>
<td>Outside (E wall near guard house)</td>
<td>-- 1993 10,000 Gal UST Jet Fuel (JP-10)</td>
</tr>
<tr>
<td>NONE</td>
<td>ST-509-02</td>
<td>508</td>
<td>--</td>
<td>--</td>
<td>Outside (East)</td>
<td>-- 500 gal Gasoline AST</td>
</tr>
<tr>
<td>NONE</td>
<td>ST-509-01</td>
<td>506</td>
<td>--</td>
<td>--</td>
<td>Outside</td>
<td>-- 300 gal diesel AST</td>
</tr>
<tr>
<td>NONE</td>
<td>ST-550-01</td>
<td>550</td>
<td>--</td>
<td>--</td>
<td>Outside</td>
<td>1 275 gal Diesel AST</td>
</tr>
<tr>
<td>NONE</td>
<td>ST-509-03</td>
<td>509</td>
<td>--</td>
<td>--</td>
<td>1</td>
<td>250 gal Gasoline AST</td>
</tr>
</tbody>
</table>
Emission Units Without Specific Limitations
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>Permit #</th>
<th>EIQ Point</th>
<th>Emission Unit No.</th>
<th>Location</th>
<th>Column</th>
<th>Level</th>
<th>Manufacturer</th>
<th>Model</th>
<th>Year</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>--</td>
<td>CT-STC-01</td>
<td>--</td>
<td>PW</td>
<td>Let1</td>
<td>1</td>
<td>C.A.B.</td>
<td>--</td>
<td>--</td>
<td>Plant-wide cooling towers</td>
</tr>
<tr>
<td>--</td>
<td>NONE</td>
<td>GB-598-02</td>
<td>598</td>
<td>R</td>
<td>1</td>
<td>Aerolyte Systems</td>
<td>BNP-600</td>
<td>Abrasive Media Blaster</td>
<td></td>
</tr>
<tr>
<td>--</td>
<td>NONE</td>
<td>GB-598-01</td>
<td>599</td>
<td>N</td>
<td>1</td>
<td>Abrasive Blasey Systems</td>
<td>370501</td>
<td>Abrasive Media Blaster</td>
<td></td>
</tr>
<tr>
<td>--</td>
<td>OV-STC-01</td>
<td>PW</td>
<td>505</td>
<td>K</td>
<td>1</td>
<td>Global Finishing Solutions</td>
<td>--</td>
<td>2007</td>
<td>Electric Curing Ovens</td>
</tr>
<tr>
<td>--</td>
<td>SC-STC-01</td>
<td>SB-505-01</td>
<td>508</td>
<td>D</td>
<td>1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>Lab Hood for electronics/R&amp;D</td>
</tr>
<tr>
<td>--</td>
<td>SC-STC-01</td>
<td>SB-508-01</td>
<td>--</td>
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<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

None
### 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.

<table>
<thead>
<tr>
<th>Permit Condition Handwipe Cleaning</th>
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<tbody>
<tr>
<td><strong>FEDERAL</strong></td>
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<tr>
<td>EMISSION UNIT NUMBER</td>
</tr>
<tr>
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</tr>
<tr>
<td>DESCRIPTION</td>
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<td>(for information only, this does not create any permit requirements)</td>
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</table>

<table>
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<tr>
<th>Permit Condition Group Handwipe Cleaning-A</th>
</tr>
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<tbody>
<tr>
<td>10 CSR 10-6.075 - Maximum Achievable Control Technology Regulations</td>
</tr>
<tr>
<td>40 CFR Part 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities</td>
</tr>
<tr>
<td>10 CSR 10-5.295 - Control of Emissions from Aerospace Manufacturing and Rework Facilities</td>
</tr>
<tr>
<td>This permit condition applies to activities involving handwipe cleaning of aerospace production parts, assemblies, and vehicles. The following are not subject to this permit condition:</td>
</tr>
<tr>
<td>1. Activities involving research and development, quality control, laboratory testing and other activities exempted by 40 CFR §63.741</td>
</tr>
<tr>
<td>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</td>
</tr>
<tr>
<td>3. Such other cleaning activities as are exempted by 40 CFR §63.741.</td>
</tr>
<tr>
<td>4. Additionally, material is not a waste requiring disposal in closed containers (see EPA Guidance referenced in Statement of Basis):</td>
</tr>
<tr>
<td>a. If it does not contain “free liquids” (as defined in 40 CFR 260.10)</td>
</tr>
</tbody>
</table>

<sup>3</sup> “X” means applicable.

<sup>4</sup> “NA” means not applicable.
b. If it’s within containers or liners rendered “empty” (as defined in 40 CFR 261.7) such as residues remaining in tubes, bottles, cups etc.
c. Until such time that it is no longer suitable for its intended purpose. For example, a tube of adhesive that is partially used but has now set up to the point it is no longer useable.
d. When the material becomes a waste it must be stored in a closed container no later than the end of the work shift.

**Emission Limitations:**

1. **Housekeeping Measures:**
   The 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), 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. [§63.744(a)(1)]
   b. Unless the permittee satisfies the requirements of §63.744(a)(4), store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers. [§63.744(a)(2)]
   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. [§63.744(a)(3)]
   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 §63.744 (a), or the storage of solvents described in §63.744 (b). [§63.744(a)(4)]
      i. 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), 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:** [§63.744(b)]
   a. The permittee shall use cleaning solvents that meet one of the following requirements:
      i. Meet one of the composition requirements in MACT GG §63.744, Table 1. [§63.744(b)(1)]
      ii. Have a composite vapor pressure of 45 mm Hg or less at 20°C (68°F). [§63.744(b)(2)]
      iii. 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. The baseline shall be approved by the delegated State Authority and shall be included as part of the installation’s part 70 permit. \(\text{[§63.744(b)(3)]}\)

iv. Cleaning solvent solutions are exempt that contain HAP and VOC below the de minimis levels specified in §63.741(f). \(\text{[§63.744(b)]}\)

Table 1: MACT GG, 63.744 Composition Requirements for Approved Cleaning Solvents

<table>
<thead>
<tr>
<th>Cleaning solvent type</th>
<th>Composition requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aqueous</td>
<td>Cleaning solvents in which water is the primary ingredient (≥80 percent of cleaning solvent solution as applied must be water). Detergents, surfactants, and bioenzyme mixtures and nutrients may be combined with the water along with a variety of additives, such as organic solvents (e.g., high boiling point alcohols), builders, saponifiers, inhibitors, emulsifiers, pH buffers, and antifoaming agents. Aqueous solutions must have a flash point greater than 93 °C (200 °F) (as reported by the manufacturer), and the solution must be miscible with water.</td>
</tr>
<tr>
<td>Hydrocarbon-based</td>
<td>Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20 °C (3.75 in. H2O and 68 °F). These cleaners also contain no HAP.</td>
</tr>
</tbody>
</table>

b. The following cleaning operations are exempt from the requirements of §63.744(b):

\(\text{[§63.744(e)]}\)

i. Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen; \(\text{[§63.744(e)(1)]}\)

ii. 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.); \(\text{[§63.744(e)(2)]}\)

iii. Cleaning and surface activation prior to adhesive bonding; \(\text{[§63.744(e)(3)]}\)

iv. Cleaning of electronic parts and assemblies containing electronic parts; \(\text{[§63.744(e)(4)]}\)

v. 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; \(\text{[§63.744(e)(5)]}\)

vi. Cleaning of fuel cells, fuel tanks, and confined spaces; \(\text{[§63.744(e)(6)]}\)

vii. Surface cleaning of solar cells, coated optics, and thermal control surfaces; \(\text{[§63.744(e)(7)]}\)

viii. Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft; \(\text{[§63.744(e)(8)]}\)

ix. 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; \(\text{[§63.744(e)(9)]}\)

x. Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing; \(\text{[§63.744(e)(10)]}\)

\(\text{[§63.744(e)]}\) The permittee does not currently use this option. It is presented for informational purposes, as it is an option contained in the regulation.
xi. Cleaning of aircraft transparencies, polycarbonate or glass substrates; [§63.744(e)(11)]

xii. 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 [§63.744(e)(12)]

xiii. 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. [§63.744(e)(13)]

**Monitoring**

1. The composite vapor pressure of hand-wipe cleaning solvents used in a cleaning operation subject to MACT GG 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 SDS or other manufacturer’s data, standard engineering reference texts, or other equivalent methods. [§63.750(b)(1)]

   b. 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 part 63) 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)]

   \[
   PP_c = \sum_{i=1}^{n} \frac{(W_i)(VP_i)}{MW_i} \sum_{e=1}^{n} \frac{W_e}{MW_e} + \sum_{i=1}^{n} \frac{W_i}{MW_i}
   \]

   Where:
   
   \( W_i \) = Weight of the “i”th VOC compound, grams.
   
   \( W_w \) = Weight of water, grams.
   
   \( W_e \) = Weight of non-HAP, non-VOC 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.

**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 installation. [§60.752(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)]

      i. The name of each cleaning solvent used; and [§63.752(b)(2)(i)]
ii. All data and/or calculations that demonstrate that the cleaning solvent complies with one of the composition requirements. [§63.752(b)(2)(ii)]

iii. 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)]

i. The name of each cleaning solvent used: [§63.752(b)(3)(i)]

ii. The composite vapor pressure of each cleaning solvent used: [§63.752(b)(3)(ii)]

iii. All vapor pressure test results, if appropriate, data and/or calculations used to determine the composite vapor pressure of each cleaning solvent; and [§63.752(b)(3)(iii)]

iv. 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, the permittee shall maintain: [5.295(4)(B)2.]

a. A list of materials with corresponding water contents for aqueous and semi-aqueous hand-wipe cleaning solvents; [5.295(4)(B)2.A.]

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 [5.295(4)(B)2.B.]

c. A current list of exempt hand-wipe cleaning processes for all cleaning solvents with a vapor pressure greater than forty-five mm Hg used in exempt hand-wipe cleaning operations. This list shall include the monthly amount of each applicable solvent used. [5.295(4)(B)2.C.]

**Reporting:**

1. The permittee shall submit the following information to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

a. Semiannual reports occurring every six (6) months that identify: [§63.753(b)(1)]

i. Any instance where a non-compliant cleaning solvent is used for a nonexempt hand-wipe cleaning operation: [§63.753(b)(1)(i)]

ii. A list of any new cleaning solvents used for hand-wipe cleaning in the previous six months, and as appropriate, their composite vapor pressure or notification that they comply with the composition requirements; [§63.753(b)(1)(ii)]

iii. 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. [§63.753(b)(1)(v)]

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. [6.065(6)(C)(I)C.(III)(a)]
### Permit Condition Depainting

<table>
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<tr>
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<td></td>
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<td>Missouri Department of Natural Resources Construction Permit #</td>
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</tr>
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### Permit Condition Depainting Alternate Operating Scenario
(Applies if the facility depaints 7 or more completed aircraft in a calendar year)

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**Permit Condition Group Depainting-A**

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

**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.
4. Additionally, material is not a waste requiring disposal in closed containers (see EPA Guidance referenced in Statement of Basis):
   a. If it does not contain “free liquids” (as defined in 40 CFR 260.10)
   b. If it’s within containers or liners rendered “empty” (as defined in 40 CFR 261.7) such as residues remaining in tubes, bottles, cups etc.
   c. Until such time that it is no longer suitable for its intended purpose. For example, a tube of adhesive that is partially used but has now set up to the point it is no longer useable. When the material becomes a waste it must be stored in a closed container no later than the end of the work shift.

**Emission/Operational Limitation:**

**Applicability:** The permittee shall comply with the requirements in §63.746(a)(1) through (3). This Permit Condition does not apply to an aerospace manufacturing or rework facility that depaints six or less completed aerospace vehicles in a calendar year. [§63.746(a)]

1. The provisions of this Permit Condition 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 Permit Condition regardless of whether their removal is considered by the permittee to be normal practice for depainting. [§63.746(a)(1)]

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 Permit Condition. [§63.746(a)(2)]

3. The following depainting operations are exempt from the requirements of this Permit Condition: [§63.746(a)(3)]
   a. Depainting of radomes; and [63.746(a)(3)(ii)]
   b. Depainting of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting. [63.746(a)(3)(ii)]

4. For **Chemical** Depainting:
   a. **HAP emissions - non-HAP chemical strippers and technologies.** Except as provided in §63.746(b)(3) and §63.746(b)(2), the permittee shall emit no organic HAP from chemical stripping formulations and agents or chemical paint softeners. [§63.746(b)(1)]
   b. The permittee 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** Depainting:
   a. Where non-chemical based equipment is used to comply with §63.746(b)(1), either in total or in part, the permittee shall maintain the equipment according to the manufacturer’s specifications or

6 Applies only to the plastic and abrasive media blasters.
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 days annually, unless such materials are organic HAP-free. \([\text{§63.746(b)(2)}]\)

b. The permittee complying with §63.746(b), that generates airborne inorganic HAP emissions from dry media blasting equipment, shall also comply with the requirements specified in §63.746(b)(4)(i), §63.746(b)(4)(ii)(A), and §63.746(b)(5): \([\text{§63.746(b)(4)}]\)

i. Perform the depainting operation in an enclosed area, unless a closed-cycle depainting system is used. \([\text{§63.746(b)(4)(i)}]\)

ii. For existing sources pass any air through a baghouse before exhausting it to the atmosphere. \([\text{§63.746(b)(4)(ii)(A)}]\)

iii. Mechanical and hand sanding operations are exempt from the requirements in §63.746(b)(4) \([\text{§63.746(b)(5)}]\)

6. General Provisions:

a. The permittee is also subject to the following: \([\text{§63.743(a)}]\)

i. §63.4, Prohibited activities and circumvention; \([\text{§63.743(a)(1)}]\)

ii. §63.5, Preconstruction review and notification requirements; and \([\text{§63.743(a)(2)}]\)

iii. §63.6, Compliance with standards and maintenance requirements. \([\text{§63.743(a)(3)}]\)

b. 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, the permittee 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. \([\text{§63.748(a)}]\)

c. 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 violation. \([\text{§63.749(i)}]\)

**Monitoring:**

1. For Mechanical Depainting: None (Baghouse not subject to §63.746(b)(4)(iii) (A), (B), (C), and (D)).

2. For Chemical Depainting: The permittee seeking to comply with §63.746(b)(3) 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 §63.750(j)(1)-(3): \([\text{§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: \([\text{§63.750(j)(1)}}\]

i. 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. \([\text{§63.750(d)(2)(i)}}\]

ii. Determine the volume of each coating (less water) as applied each month. \([\text{§63.750(d)(2)(ii)}}\]

iii. The volume applied may be determined from company records. \([\text{§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. \([\text{(§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 or 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.

**Record Keeping:**

The permittee shall fulfill the following recordkeeping requirements:

1. **General:**
   a. For each type of aircraft depainted at the installation, 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)]
      i. The name of each chemical stripper; and, [§63.752(e)(1)(i)]
      ii. 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)]
      i. The names and types of non-chemical based equipment; and, [§63.752(e)(5)(i)]
      ii. For periods of malfunction: [§63.752(e)(5)(ii)]
         1) The non-chemical method or technique that malfunctioned; [§63.752(e)(5)(ii)(A)]
         2) The date that the malfunction occurred; [§63.752(e)(5)(ii)(B)]
         3) A description of the malfunction; [§63.752(e)(5)(ii)(C)]
         4) The methods used to depaint aerospace vehicles during the malfunction period; [§63.752(e)(5)(ii)(D)]
         5) The dates that these methods were begun and discontinued; and [§63.752(e)(5)(ii)(E)]
         6) 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. 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)]
8. 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)]
9. The permittee shall submit annual reports that identify: [§63.753(d)(2)]
   a. 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))
10. 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. [6.065(6)(C)1.C.(III)(a)]
11. The permittee shall submit the reports to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

<table>
<thead>
<tr>
<th>Permit Condition</th>
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| CC-STC-01 | X | X | NA | NA | Plant-wide spray gun cleaning |

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; [§63.741(f)]
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 [§63.748(a)]
3. Such other cleaning activities as are exempted by 40 CFR §63.741.
4. Additionally, material is not a waste requiring disposal in closed containers (see EPA Guidance referenced in Statement of Basis):
   a. If it does not contain “free liquids” (as defined in 40 CFR 260.10)
   b. If it’s within containers or liners rendered “empty” (as defined in 40 CFR 261.7) such as residues remaining in tubes, bottles, cups etc.
   c. Until such time that it is no longer suitable for its intended purpose. For example, a tube of adhesive that is partially used but has now set up to the point it is no longer useable.
   d. When the material becomes a waste it must be stored in a closed container no later than the end of the work shift.
**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 permittee satisfies the requirements in §63.744(a)(4), 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 permittee satisfies the requirements in §63.744(a)(4), 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) that equivalent or better alternative measures are in place compared to the use of closed containers for the solvent-laden materials described in §63.744(a)(1), or the storage of solvents described in §63.744(a)(2). [§63.744(a)(4)]

2) Spray gun cleaning.
   a) The permittee shall use one or more of the techniques, or their equivalent, specified in §63.744(c)(1) through (4). 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 §63.744(c)(1) through (4). [§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 §63.744(c). [§63.744(c)(5)]

3) Compliance - Cleaning Operations - Each cleaning operation shall be considered in noncompliance if the permittee fails to institute and carry out the housekeeping measures required in §63.744(a).
Incidental emissions resulting from the activation of pressure release vents and valves on enclosed cleaning systems are exempt from §63.749(c)(2). [§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 more of the four techniques specified in §63.744(c) is/are used; [§63.749(c)(2)(i)]

2. The technique selected is operated according to the procedures specified in §63.744(c) 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 Subpart GG, the permittee 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)]

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 violation. [(§63.749(i)]

**Monitoring:**
The permittee using an enclosed spray gun cleaner 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 [§63.752(b)(5)(i)]

      2. Date leak was discovered [§63.752(b)(5)(ii)]

      3. Date leak was repaired [§63.752(b)(5)(iii)]

**Reporting:**
The permittee shall submit the following information: [§63.753(b)]

1) Semiannual reports that identify: [§63.753(b)(1)]

   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 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

7 Spray gun cleaning may involve different cleaning methods for thorough cleaning (e.g. combining non-atomized with disassembled) and different painters may use different techniques at the same time.
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. [6.065(6)(C)(1.C.(III)(a)]

3) The permittee shall submit the reports to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
### Group Spray Booths

<table>
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<tr>
<th>EMISSION UNIT NUMBER</th>
<th>FEDERAL</th>
<th>DESCRIPTION (for information only, this does not create any permit requirements)</th>
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<tr>
<td>SC-STC-01</td>
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</table>

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

**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 (03), (SB) 598-02 (04), (SB) 598-03/04 (05), (SB) 598-05 (02), (SB) 598-10 (01), SB 599-06 (01), and Ovens (OV) 598-01 through OV 598-02 inclusive.
Monitoring/Record Keeping:
1. The permittee shall maintain records of the monthly and consecutive 12 month total VOC emissions from the emission units listed above. The permittee shall use Attachment [Paint Booth VOC], or equivalent, to demonstrate compliance.
2. These forms will be completed within thirty days after the end of each calendar month.
3. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

Reporting:
1. The permittee shall report no later than thirty days after the end of the month during which any record shows an exceedance of the emission limitation.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

<table>
<thead>
<tr>
<th>Permit Condition Group Spray Booths-B</th>
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<tr>
<td>10 CSR 10-6.075 Maximum Achievable Control Technology Regulations</td>
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<tr>
<td>40 CFR Part 63 Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities</td>
</tr>
<tr>
<td>10 CSR 10-5.295 Control of Emissions from Aerospace Manufacturing and Rework Facilities</td>
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</tbody>
</table>

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; [§63.741(f)]
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 [§63.748(a)]
3. Such other cleaning activities as are exempted by 40 CFR §63.741.
4. Additionally, material is not a waste requiring disposal in closed containers (see EPA Guidance referenced in Statement of Basis):
   a. If it does not contain “free liquids” (as defined in 40 CFR 260.10)
   b. If it’s within containers or liners rendered “empty” (as defined in 40 CFR 261.7) such as residues remaining in tubes, bottles, cups etc.
   c. Until such time that it is no longer suitable for its intended purpose. For example, a tube of adhesive that is partially used but has now set up to the point it is no longer useable.
   d. When the material becomes a waste it must be stored in a closed container no later than the end of the work shift.
Emission Limitation:
1. The permittee shall comply with the following organic HAP and VOC content limits: [§63.745(c)]
   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. [§63.754(c)(2)]
      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) as applied. [§63.754(c)(1)]
      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. [§63.754(c)(4)]
      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. [§63.754(c)(3)]
      iii. The VOC content may be used as a surrogate for the organic HAP content.
   c. Specialty Coatings:
      i. Shall be limited to a VOC content level of no more than the VOC content limit specified in MACT GGG Table 1 for each specialty coating type. [§63.745(c)(6)]
      ii. Shall be limited to an organic HAP content level of no more than the organic HAP content limit specified in MACT GGG Table 1 for each specialty coating type. [§63.745(c)(5)]
      iii. The VOC content may be used as a surrogate for the organic HAP content.
      iv. MACT GGG Table 1 is included as Appendix B of this operating permit.
   d. The permittee shall demonstrate compliance with §63.754(c) by using the following methods, either by themselves or in conjunction with one another: [§63.745(e)]
      i. Use primers, topcoats (including self-priming topcoats), and Specialty coatings with HAP and VOC content levels equal to or less than the limits. [§63.745(e)(1)]
      ii. Use the averaging provisions described in §63.743(d). [§63.745(e)(2)]
         1) Instead of complying with the individual coating limits in §§63.745 and 63.747, the permittee may choose to comply with the averaging provisions specified in §63.743 (d)(1) through (d)(6). [§63.743(d)]
            a) The permittee shall use any combination of primers, topcoats (including self-priming topcoats), specialty coatings, Type I chemical milling maskants, or Type II chemical milling maskants such that the monthly volume-weighted average organic HAP and VOC contents of the combination of primers, topcoats, specialty coatings, Type I chemical milling maskants, or Type II chemical milling maskants, as determined in accordance with the applicable procedures set forth in §63.750, complies with the specified content limits in §§63.745(c) and 63.747(c), unless the permitting agency specifies a shorter averaging period as part of an ambient ozone control program. [§63.743(d)(1)]
            b) Averaging is allowed only for uncontrolled primers, topcoats (including self-priming topcoats), specialty coatings, Type I chemical milling maskants, or Type II chemical milling maskants. [§63.743(d)(2)]
            c) Averaging is not allowed between specialty coating types defined in appendix A to Subpart GG, or between the different types of coatings specified in §63.743 (d)(3)(i) through (vii). [§63.743(d)(3)]
               i) Primers and topcoats (including self-priming topcoats). [§63.743(d)(3)(i)]
               ii) Type I and Type II chemical milling maskants. [§63.743(d)(3)(ii)]
               iii) Primers and chemical milling maskants. [§63.743(d)(3)(iii)]
iv) Topcoats and chemical milling maskants. [§63.743(d)(3)(iv)]

v) Primers and specialty coatings. [§63.743(d)(3)(v)]

vi) Topcoats and specialty coatings. [§63.743(d)(3)(vi)]

vii) Chemical milling maskants and specialty coatings. [§63.743(d)(3)(vii)]

d) Each averaging scheme shall be approved in advance by the permitting agency and adopted as part of the facility's title V permit. [§63.743(d)(6)]

2. Inorganic HAP emissions – primer, topcoat, and specialty coating application operations.

a. For each primer, topcoat, or specialty coating 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 §63.745(g)(1) through (g)(3) do not apply to the following: [§63.745(g)(4)]

a) Touch-up of scratched surfaces or damaged paint; [§63.745(g)(4)(i)]

b) Hole daubing for fasteners; [§63.745(g)(4)(ii)]

c) Touch-up of trimmed edges; [§63.745(g)(4)(iii)]

d) Coating prior to joining dissimilar metal components; [§63.745(g)(4)(iv)]

e) Stencil operations performed by brush or air brush; [§63.745(g)(4)(v)]

f) Section joining; [§63.745(g)(4)(vi)]

g) Touch-up of bushings and other similar parts; [§63.745(g)(4)(vii)]

h) Sealant detackifying; [§63.745(g)(4)(viii)]

i) Spray application of primers, topcoats, and specialty coatings in an area identified in a title V permit, where the permitting authority has determined that it is not technically feasible to spray apply coatings to the parts in a booth; [§63.745(g)(4)(ix)]

i) The part is too large to be painted in a booth.

ii) The coatings are not spray applied.

iii) The part would need to be removed from a fixture/tool to be painted in a booth.

iv) Rework on parts that have been assembled such that a tool is no longer available to place the assembled parts in a booth.

v) Cycle time restrictions prior to subsequent operations make it time prohibitive to move the part to a paint booth.

vi) Other operations where engineering analysis recommends the part be painted outside of a booth.

j) The use of hand-held non-refillable aerosol containers; and; [§63.745(g)(4)(x)]

k) The spray application of no more than 3.0 fluid ounces of coating in a single application (i.e., the total volume of a single coating formulation applied during any one day to any one aerospace vehicle or component) from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters). Using multiple small paint cups or refilling a small paint cup to apply more than 3.0 fluid ounces under these requirements is prohibited. If a paint cup liner is used in a reusable holder or cup, then the holder or cup must be designed to hold a liner with a capacity of no more than 3.0 fluid ounces. For example, under the requirements of §63.745(g)(4)(xi), a 3.0 ounce liner cannot be used in a holder that can also be used with a 6.0 ounce liner. [§63.745(g)(4)(xi)]
2) The application operation 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. The permittee shall comply with the following applicable requirements for primer, topcoat, or specialty coating application operations: [§63.745(g)]

i. Apply these coatings in a booth, hangar, or portable enclosure 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)]

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 2 and 3 of §63.745(g); [§63.745(g)(2)(i)(A)]

Table 2: MACT GG, §63.745 Table 2-Two Stage Arrestor; Liquid Phase Challenge for Existing Sources

<table>
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<th>Filtration efficiency requirement, %</th>
<th>Aerodynamic particle size range, µm</th>
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<td>&gt;90</td>
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<td>&gt;10</td>
<td>&gt;2.2</td>
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Table 3: MACT GG, §63.745 Table 3-Two Stage Arrestor; Solid Phase Challenge for Existing Sources

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<th>Filtration efficiency Requirement, %</th>
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<td>&gt;5.0</td>
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<tr>
<td>&gt;10</td>
<td>&gt;2.6</td>
</tr>
</tbody>
</table>

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 §63.743(a)(4) through (a)(10) and in Table 1 of 40 CFR Part 63, Subpart GG, the permittee is also subject to the following sections of subpart A of part 63: [§63.743(a)]

a. §63.4, Prohibited activities and circumvention; [§63.743(a)(1)]

b. §63.5, Preconstruction review and notification requirements; and [§63.743(a)(2)]

c. §63.6, Compliance with standards and maintenance requirements. [§63.743(a)(3)]

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 Subpart GG, the permittee subject to 40 CFR Part 63, Subpart GG that produces a waste that contains HAP must be handled and stored as specified in §63.748(a)(1) and (2). [§63.748(a)]
a. The permittee 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)(1)]

b. The permittee shall store all waste that contains organic HAP in closed containers. [§63.748(a)(2)]

i. Additionally, material is not a waste requiring disposal in closed containers (see EPA Guidance referenced in Statement of Basis):
   1) If it does not contain “free liquids” (as defined in 40 CFR 260.10)
   2) If it’s within containers or liners rendered “empty” (as defined in 40 CFR 261.7) such as residues remaining in tubes, bottles, cups etc.
   3) Until such time that it is no longer suitable for its intended purpose. For example, a tube of adhesive that is partially used but has now set up to the point it is no longer useable.
   4) When the material becomes a waste it must be stored in a closed container no later than the end of the work shift

c. 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 violation. [§63.749(i)]

5. For the purposes of compliance with the requirements of §63.5(b)(4) of the General Provisions and MACT GG, the permittee of existing primer, topcoat, or specialty coating 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:
For Organic HAP and VOC containing coatings:

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 §63.745(f)(1) through (2). [§63.745(f)]

a. All primers, topcoats (including self-priming topcoats), and specialty coatings shall be applied using one or more of the application techniques in §63.745(f)(1)(i) through (v): [§63.745(f)(1)]
   i. High volume low pressure (HVLP) spraying; [§63.745(f)(1)(i)]
   ii. Electrostatic spray application; [§63.745(f)(1)(ii)]
   iii. Airless spray application; [§63.745(f)(1)(iii)]
   iv. Air-assisted airless spray application; or [§63.745(f)(1)(iv)]
   v. Any other coating spray application methods that achieve emission reductions or a transfer efficiency equivalent to or better than HVLP spray, electrostatic spray, airless spray, or air-assisted airless spray application methods as determined according to §63.750(i). [§63.745(f)(1)(v)]

b. All application devices used to apply primers, topcoats (including self-priming topcoats), or specialty coatings shall be operated according to company procedures, local specified operating
The Boeing Company Part 70 Operating Permit
Installation ID: 183-0010  Project No. 2014-12-048

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 spray, electrostatic spray, airless spray, or air-assisted airless spray application techniques. [§63.745(f)(2)]

c. The following situations are exempt from the requirements of §63.745(f)(1): [§63.745(f)(3)]
   i. Any situation that normally requires an extension on the spray gun to properly reach limited access spaces; [§63.745(f)(3)(i)]
   ii. The application of coatings that contain fillers that adversely affect atomization with HVLP spray guns. [§63.745(f)(3)(ii)]
   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 §63.745(f)(1);
   iv. The use of airbrush application methods for stenciling, lettering, and other identification markings, and the spray application of no more than 3.0 fluid ounces of coating in a single application (i.e., the total volume of a single coating formulation applied during any one day to any one aerospace vehicle or component) from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters). Using multiple small paint cups or refilling a small paint cup to apply more than 3.0 fluid ounces under these requirements is prohibited. If a paint cup liner is used in a reusable holder or cup, then the holder or cup must be designed to hold a liner with a capacity of no more than 3.0 fluid ounces. For example, a 3.0 ounce liner cannot be used in a holder that can also be used with a 6.0 ounce liner under these requirements. [§63.745(f)(3)(iv)]
   v. The use of hand-held non-refillable aerosol containers
   vi. Touch-up and repair operations.
   vii. Adhesives, sealants, maskants, caulking materials, and inks; and [§63.745(f)(3)(vii)]
   viii. The application of coatings that contain less than 20 grams of VOC per liter of coating. [§63.745(f)(3)(viii)]

Monitoring:
If a dry particulate filter system is used, the following requirements shall be met when aerospace production primer, topcoat, or specialty coating 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 or install an interlock system that will automatically shut down the coating spray application system if the pressure drop exceeds or falls below the filter manufacturer’s recommended limits. [§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 permittee using method 319 in appendix A of subpart A of Part 63, to meet or exceed the efficiency data points found in Tables 2 and 3 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, topcoat, or specialty coating application operations 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). [§63.751(c)(1)]

Record Keeping:

1. Primer, topcoat, and specialty coating application operations—organic HAP and VOC. The permittee required to comply with the organic HAP and VOC content limits specified in §63.745(c) shall record the information specified in §63.752(c)(1) through (6), as appropriate. The permittee using coating manufacturer's supplied data to demonstrate compliance with the applicable organic HAP or VOC limit specified in §63.745(c) may retain the manufacturer's documentation and annual purchase records in place of the records specified in §63.752(c)(2) and (3). The permittee using the coating manufacturer's supplied data to demonstrate compliance based on the HAP content of the coating, and adding non-HAP solvent to those coatings, must also maintain records of the non-HAP solvent added to the coating. [§63.752(c)]
   a. The name and VOC content as received and as applied of each primer, topcoat, and specialty coating used at the facility. [§63.752(c)(1)]
   b. For uncontrolled primers, topcoats, and specialty coatings that meet the organic HAP and VOC content limits in §63.745(c)(1) through (c)(6) without averaging: [§63.752(c)(2)]
      i. The mass of organic HAP emitted per unit volume of coating as applied (less water) (Hi) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (Gi) for each coating formulation within each coating category used each month (as calculated using the procedures specified in §63.750(c) and (e)); [§63.752(c)(2)(i)]
      ii. All data, calculations, and test results (including EPA Method 24 results) used in determining the values of Hi and Gi; and [§63.752(c)(2)(ii)]
      iii. The volume (gal) of each coating formulation within each coating category used each month. [§63.752(c)(2)(ii)]
   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; and [§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 Hi if not applied as received. [§63.752(c)(3)(ii)]
   d. For primers, topcoats, and specialty coatings 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) (Ha) and of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (Ga) for all coatings (as determined by the procedures specified in §63.750(d) and (f)); and [§63.752(c)(4)(i)]
      ii. All data, calculations and test results (including EPA Method 24 results) used to determine the values Ha and Ga. [§63.752(c)(4)(ii)]
2. **Primer, topcoat, and specialty coating application operations— inorganic HAP emissions.**
   
   [§63.752(d)]
   
   a. The permittee complying with §63.745(g) for the control of inorganic HAP emissions from primer, topcoat, and specialty coating application operations through the use of a dry particulate filter system or a HEPA filter system shall record the pressure drop across the operating system once each shift during which coating operations occur. [§63.752(d)(1)]
   
   i. For this provision, a shift is defined as an eight 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 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:**

1. **Primer, topcoat, and specialty coating application operations.** The permittee of a primer or topcoat application operation shall submit the following information: [§63.753(c)]
   
   a. Semiannual reports occurring every 6 months that identify: [§63.753(c)(1)]
      
      i. For primers, topcoats, and specialty coatings where compliance is not being achieved through the use of averaging or a control device, the HAP or VOC content in manufacturer's supplied data as recorded under §63.752(c), or each value of $H_i$ and $G_i$, as 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)]
      
      ii. For primers, topcoats, and specialty coatings where compliance is being 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)]
      
      iii. All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. [§63.753(c)(1)(vi)]
      
      iv. If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards; and. [§63.753(c)(1)(vii)]
   
   b. The permittee shall submit annual reports listing the number of times the pressure drop for each dry filter was outside the limit(s) as specified by the filter or booth manufacturer or in locally prepared operating procedures. [§63.753(c)(2)]

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. [6.065(6)(C)1.C.(III)(a)]
**Emission Limitation:**
The permittee shall emit less than 40.0 tons of VOCs in any consecutive 12-month period from the Harpoon Missile Paint Booth (SB-540-01). The SSM emissions as reported to the Air Pollution Control Program’s Compliance and Enforcement Section in accordance with the requirements of 10 CSR 10-6.050, Start-Up, Shutdown, and Malfunction Conditions shall be included in the limit. [Special Condition #1.A.]

**Operational Limitation:**
1. The permittee shall capture and control PM$_{2.5}$ emissions from the SB-540-01 paint booth by using a dry particulate filter system which meets the requirements for new sources contained in 40 CFR part 63 Subpart GG, §63.745(g). [Special Condition #2.A.]
2. The permittee shall ensure the dry particulate filters meet the certification requirements contained in 40 CFR part 63 Subpart GG, §63.750(o). [Special Condition #2.B.]

**Alternative Coating Materials and Cleaning Solvents:**
1. The permittee shall operate handwipe cleaning operations and may use alternate solvents other than those in the construction permit application in compliance with 40 CFR part 63 Subpart GG §63.744. [Special Condition 3.]
2. The permittee may use alternative coatings other than those in the construction permit application; however, all coatings used in the SB-540-01 paint booth must show compliance with 40 CFR part 63 Subpart GG §63.745 and handwipe cleaning operations with 40 CFR part 63 Subpart GG §63.744. [Special Condition 4.A.]
3. The permittee shall include emissions from all alternative materials and cleaning solvents in the compliance demonstration for the emission limitation. [Special Condition 4.B.]
4. The permittee shall maintain a copy of the alternative material and cleaning solvent’s information and other documentation (such as SDS) used to estimate the emissions. The permittee shall use the highest VOC concentrations listed on the manufacturer’s respective tech data/safety sheets to calculate and track emissions from the alternative material and cleaning solvents. [Special Condition 4.C.]

**Monitoring/Record Keeping:**
1. The permittee shall meet the recordkeeping requirements contained in 40 CFR part 63 Subpart GG §63.752 for the filter system. [Special Condition 2.C.]
2. The permittee shall maintain records of the monthly and consecutive 12 month total VOC emissions from the emission units listed above. The permittee shall use Attachment Paint Booth VOC, or equivalent, to demonstrate compliance.
3. These forms, or equivalent, will be completed within thirty days after the end of each calendar month.
4. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include SDS for all materials used. [Special Condition 5.A.]

**Reporting:**
1. The permittee shall report no later than thirty days after the end of the month during which any record shows an exceedance of any limitation. [Special Condition 5.B.]
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.

3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
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**DESCRIPTION**
(for information only, this does not create any permit requirements)

8 Construction permit 0997-007 did not place any requirements on this boiler.
9 Construction permit 0997-007 did not place any requirements on this boiler.
12 Existing boiler so tune-up requirement began January 31, 2016
**Permit Condition Boiler Group-A**

40 CFR 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

**Operational Limitation/Emission Limitations:**

NA

**Monitoring:**

1. Tune up requirements (see 63.7540(a)(10)(i-vi))
   a. Boilers greater than 10 MMMBTU/hr, tune-ups required once a year
   b. Boilers between 5-10 MMBTU/hr, tune-ups required once every other year
   c. Boilers less than 5 MMBTU/hr, tune ups required once every 5 years

**Record Keeping:**

The permittee shall maintain records of:

1. Boiler tune-up as required in the monitoring section
2. Natural gas curtailment information of hours and amount of alternative fuel used, if applicable (63.7545(f)).
3. One time energy assessment as defined in Table 3 to Subpart DDDDD of Part 63

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 within 48 hours of curtailment
2. The permittee shall submit annual compliance reports to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov) by April 1st of the following year and reports shall identify (63.7550(c)(5) (i-iii, xiv)):
   a. Tune up dates for that year
   b. Any deviations from the rule

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**Permit Condition Boiler Group-B**

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions\(^\text{10}\)

**Operational Limitation:**

1. For emission units combusting solely natural gas or ultra low sulfur distillate fuel oil with a maximum fuel sulfur content of fifteen (15) ppm: the permittee shall comply with the record keeping requirements of 6.261(4). [6.261(1)(A)]

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\(^{10}\) This regulation is state a state requirement only. When this regulation is incorporated into the SIP, this permit condition will become a state and federal requirement.
**Monitoring/Record Keeping:**

1. The permittee must maintain the fuel supplier certification information to certify all fuel deliveries.\(^{11}\)
   Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable: [6.261(4)(C)]
   a. The name, address, and contact information of the fuel supplier; [6.261(4)(C)1.]
   b. The type of fuel; [6.261(4)(C)2.]
   c. The sulfur content or maximum sulfur content expressed in percent sulfur by weigh or in ppm sulfur for ultra low sulfur diesel fuel or fuel conforms to 40 CFR 72.2 definition of natural gas; [6.261(4)(C)3.]

2. The permittee must retain all required reports and records on-site for a minimum of five years and make available within five business days upon written or electronic request by the director. [6.261(4)(F)]

3. The permittee must furnish the director, upon request, all data necessary to determine compliance status. [6.261(4)(G)]

**Reporting:**

1. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual and semiannual compliance certification reports required by Section V of this permit.

2. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

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**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]

2. Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 40 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]

3. Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presence of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

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11 The installation receives natural gas via pipeline, it is not delivered and stored on site.

12 The version of this regulation contained in Missouri’s State Implementation Plan (SIP) is different than the version currently contained in Missouri’s Code of State Regulations (CSR). The CSR version exempts natural gas fired units (6.220(1)(L)), certain units regulated under 40 CFR part 63 Subpart DDDDD (6.220(1)(J)), and emission units subject to an equivalent or more stringent emission limit under 10 CSR 10-6.075 or any federally enforceable permit (6.220(1)(P)). The current SIP version does not contain these exemptions. Emission limitations and compliance methods are the same for both versions, therefore the requirements appear in one permit condition. When the current CSR version is adopted into the SIP, this permit condition will not apply to the installation. A permit modification is not required to reflect this change.
Monitoring:
1. Monitoring schedule:
   a. The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i. The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
         1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
   2. If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
   3. Observations are only required when the emission units are operating and when the weather conditions allow.
   4. Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
   5. The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
   6. For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Recordkeeping:
1. The permittee shall maintain records of all observation results for each emission unit using Attachment Method 9 and Attachment Method 22, or equivalents, to demonstrate compliance.
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

Reporting:
1. The permittee shall report any exceedance of the limitations no later than thirty days after an exceedance of the emission limitation.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Group EG – Emergency Generators
**Operational Limitation:**
1. For emission units combusting solely natural gas or ultra-low sulfur distillate fuel oil with a maximum fuel sulfur content of fifteen (15) ppm: the permittee shall comply with the record keeping requirements of 6.261(4). [6.261(1)(A)]

**Monitoring/Record Keeping:**
1. The permittee must maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable: [6.261(4)(C)]
   a. The name, address, and contact information of the fuel supplier; [6.261(4)(C)1.]
   b. The type of fuel; [6.261(4)(C)2.]
   c. The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur for ultra low sulfur diesel fuel or fuel conforms to 40 CFR 72.2 definition of natural gas [6.261(4)(C)3.]

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13 This regulation is a state requirement only. When this regulation is incorporated into the SIP, this permit condition will become a state and federal requirement.
14 The installation receives natural gas via pipeline, it is not delivered and stored on site.
2. The permittee must retain all required reports and records on-site for a minimum of five years and make available within five business days upon written or electronic request by the director. [6.261(4)(F)]

3. The permittee must furnish the director all data necessary to determine compliance status. [6.261(4)(G)]

**Reporting:**
1. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual and semi-annual compliance certification reports required by Section V of this permit.
2. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

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## Permit Condition Group EG-B

### Operational Limitation:
1. The permittee shall 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. The permittee shall 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. The permittee shall install a non-resettable hour meter on:
   a. an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions [40 CFR Part 63.6625(f)]
   b. a new or reconstructed emergency 4SLB stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions [40 CFR Part 63.6625(d)]
4. The permittee shall limit maintenance checks and readiness testing of such units to 100 hours per year [40 CFR Part 63.6640(f)(2)(i)]
5. The permittee 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)(3) [40 CFR Part 63.6640(f)(3)]

### Monitoring:
**Boeing complies with the below requirements on a calendar year basis**
1. The permittee shall change oil and filter every 500 hours of operation or annually, whichever comes first [40 CFR Part 63, Subpart ZZZZ, Table 2c];
2. Alternatively, the permittee may utilize an oil analysis program as described in § 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2c of this subpart. [40 CFR Part 63, Subpart ZZZZ Table 2c]
3. The permittee shall inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary for applicable Compression Ignition units. [40 CFR Part 63, Subpart ZZZZ, Table 2c]

4. The permittee shall 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. The permittee shall 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 permittee 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. For an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee 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. [40 CFR Part 63.6655(f)]

**Reporting:**

1. The permittee shall submit the semiannual and annual compliance reports to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov each instance in which it did not meet the requirements in the general provisions that apply. [40 CFR Part 63.6640(e)] for:
   a. A new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP
   b. A new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions does not need to comply with the requirements in Table 8 of this subpart except for the initial notification requirements

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.

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**Emission Limitation:**

1. For 2007 model year and later emergency stationary CI internal combustion engines, the permittee shall purchase engines certified to the emission standards in 60.4205(b), or 60.4205(c), as applicable, for the same model year and maximum engine power. (40 CFR 60.4211(c))

2. The permittee shall, use diesel fuel that meets the requirements of 40 CFR 80.510(b). (40 CFR 60.4207)

3. The permittee shall limit maintenance checks and readiness testing of emergency stationary ICE to 100 hours per year. (40 CFR 60.4211(f))

4. The permittee 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. (40 CFR 60.4211(f)(3))
Monitoring:
1. The permittee shall install a non-resettable hour meter prior to startup of the engine. (60.4209(a))
2. The permittee shall operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer’s emission-related written instructions. The permittee may only change those emission-related settings that are permitted by the manufacturer. The permittee shall meet the applicable requirements of 40 CFR parts 89, 94, and 1068. (40 CFR 60.4211(a))

Recordkeeping:
1. The permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded from the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60.4214(b)]

Reporting:
1. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual and semi-annual compliance certification reports required by Section V of this permit.
2. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
### Group ST- Storage Tanks

<table>
<thead>
<tr>
<th>Emission Unit Number</th>
<th>Federal</th>
<th>Missouri Department of Natural Resources Construction Permit #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>10 CSR 10-5.500 Control of Emissions From Volatile Organic Liquid Storage</strong></td>
<td></td>
<td>(for information only, this does not create any permit requirements)</td>
</tr>
</tbody>
</table>

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<tr>
<th>Emission Unit Number</th>
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<tr>
<td>ST-598-01</td>
<td>X</td>
<td>NA</td>
<td>10,000 Gal UST Jet Fuel (JP-10)</td>
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<td>ST-509-02</td>
<td>X</td>
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<td>500 gal Gasoline AST</td>
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<tr>
<td>ST-509-03</td>
<td>X</td>
<td>NA</td>
<td>250 gal Gasoline AST</td>
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</tbody>
</table>

### Permit Condition Group Tanks-A
10 CSR 10-5.500 Control of Emissions From Volatile Organic Liquid Storage

**Recordkeeping:**

1. The permittee shall maintain readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel. [5.500(4)(E)]
2. The permittee shall maintain all records on site for the life of the source. The records shall be made available to the department immediately upon request. [5.500(4)(H)]
IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

3) No recordkeeping, monitoring, or reporting requirements.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.

Emission Limitation: None
Monitoring Requirements: None

Recordkeeping Requirements:

1) Information submitted as part of the Reporting Requirements shall be kept on file at the installation for five (5) years. This data shall be included in emission reported on any required Emission Inventory Questionnaire.

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) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive
release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

Missouri has accepted delegation of this federal regulation. It is a state and federal requirement.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.
Emission Limitation: None
Monitoring Requirements: None
Recordkeeping Requirements: The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
Reporting Requirements:
1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.
Emission Limitation: 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.
Monitoring Requirements: None
Recordkeeping Requirements: None
Reporting: The permittee shall submit an appropriate emergency plan if required by the director.

10 CSR 10-6.150 Circumvention
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.
Emission Limitation: 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.
Monitoring Requirements: None
Recordkeeping Requirements: None
Reporting: None
10 CSR 10-6.165 Restriction of Emission of Odors

This regulation is contained in the CSR and is not in Missouri’s SIP. It is a state requirement.

**Emission Limitation:**
No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation’s property boundary.

**Monitoring Requirements:** None

**Recordkeeping Requirements:** None

**Reporting:** None

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.

**Emission Limitation:**
1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

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

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

**Reporting:** 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

This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.

**Emission Limitation:** 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. All tests shall be performed by qualified personnel.

2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

**Recordkeeping Requirements**: None

**Reporting**:

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

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**10 CSR 10-6.250 Asbestos Abatement Projects**

**Certification, Accreditation, and Business Exemption Requirements**

*This regulation is contained in the CSR and is not in Missouri’s SIP. It is a state requirement.*

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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**10 CSR 10-6.280 Compliance Monitoring Usage**

*This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.*

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited
This regulation is contained in the CSR and in Missouri’s SIP. It is a state and federal requirement.

Emission Limitation: No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities 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 or to other equipment exempted under 10 CSR 10-5.040. 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.

Monitoring Requirements: None
Recordkeeping Requirements: None
Reporting: None

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
This regulation has been removed from the CSR, but is contained in Missouri’s SIP. It is a federal requirement.

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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)
This is a federal requirement.

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

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).

e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.

f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR Part 82
V. General Permit Requirements

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

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

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(5)(C)1.C

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 available within a reasonable period of time to any Missouri Department of Natural Resources’ personnel upon request.

2) Reporting

a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

b) Semiannual Monitoring Reports:

i) The permittee shall submit a report of all required monitoring 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 report shall 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.

c) Supplemental Reports Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.

i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of...
emissions that exceeded the emission standards or requirements in the permit. The notice
must contain a description of the emergency, the steps taken to mitigate emissions, and the
corrective actions taken.
ii) Any deviation that poses an imminent and substantial danger to public health, safety or the
environment shall be reported as soon as practicable.
iii) Any other deviations identified in the permit as requiring more frequent reporting than the
permittee's semiannual report shall be reported on the schedule specified in this permit.
d) Every report submitted shall be certified by the responsible official, except that, if a report of a
deviation must be submitted within ten days after the deviation, the report may be submitted
without a certification if the report is resubmitted with an appropriate certification within ten
days after that, together with any corrected or supplemental information required concerning the
deviation.
e) The permittee may request confidential treatment of information submitted in any report of
deviation.

Risk Management Plan Under Section 112(r)
10 CSR 10-6.065(5)(C)1.D
If the installation is required to develop and register a risk management plan pursuant to Section 112(r)
of the Act, the permittee will verify that it has complied with the requirement to register the plan.

Severability Clause
10 CSR 10-6.065(5)(C)1.F
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.

General Requirements
10 CSR 10-6.065(5)(C)1.G
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.

Incentive Programs Not Requiring Permit Revisions
10 CSR 10-6.065(5)(C)1.H
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.

Reasonably Anticipated Operating Scenarios
10 CSR 10-6.065(5)(C)1.I
There are no reasonably anticipated operating scenarios.

Compliance Requirements
10 CSR 10-6.065(5)(C)3
1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to Missouri Compliance Coordinator, Air Branch; Enforcement and Compliance Assurance Division; EPA Region VII; 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. 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.

**Permit Shield**

**10 CSR 10-6.065(5)(C)6**

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

   a) The applicable requirements are included and specifically identified in this permit, or
   b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:

   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

**Emergency Provisions**

**10 CSR 10-6.065(7)(C)7**

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.

Operational Flexibility
10 CSR 10-6.065(5)(C)8
An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a
permit revision in order to make any of the changes to the permitted installation described below if the
changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable
under the permit, and the changes do not result in the emission of any air contaminant not previously
emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement
Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as
Missouri Compliance Coordinator, Air Branch; Enforcement and Compliance Assurance Division; EPA
Region VII; 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes,
except as allowed for emergency or upset conditions. Emissions allowable under the permit means a
federally enforceable permit term or condition determined at issuance to be required by an applicable
requirement that establishes an emissions limit (including a work practice standard) or a federally
enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the
source would otherwise be subject.

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

Off-Permit Changes
10 CSR 10-6.065(5)(C)9
1) Except as noted below, the permittee may make any change in its permitted operations, activities or
emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a
permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or
prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the
off-permit provisions of this section. Off-permit changes shall be subject to the following
requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing
permit term or condition; the permittee may not change a permitted installation without a permit
revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch; Enforcement and Compliance Assurance Division; EPA Region VII; 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Obie Jones, Vice President Quality & Manufacturing & St. Louis Site Leader. On December 14, 2016, May 11, 2018, and January 28, 2020 the Air Pollution Control Program was informed of changes to the responsible official. As of January 28, 2020, the current responsible official and alternate responsible officials are as follows:

Primary Responsible Official: Paisley Matthews
Vice President
Strike, Surveillance, & Mobility & St. Louis Site Leader

Alternative Responsible Officials: Steve Newman
Director
SSM Integration

and

Richard Smith
Senior Manager
Environment, Health, & Safety

If these person(s) terminate employment, or are reassigned different duties such that a different person(s) becomes the responsible person to represent and bind the installation in environmental permitting affairs, the permittee shall notify the director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person(s) assigned by the permittee to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person(s) 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.
Reopening-Permit for Cause

10 CSR 10-6.065(5)(E)6

This permit shall be reopened for cause if:

1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,

2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or

5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

10 CSR 10-6.065(5)(E)1.C

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 (5)(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(5)(B)1.B.

10 CSR 10-6.065 (5)(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 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 and MACT GG Table 1-Specialty Coatings
HAP and VOC Content Limits

<table>
<thead>
<tr>
<th>Coating Type</th>
<th>HAP Limit</th>
<th>VOC Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>g/L</td>
<td>g/L</td>
</tr>
<tr>
<td></td>
<td>(lb/gallon)</td>
<td>(lb/gallon)</td>
</tr>
<tr>
<td>Ablative Coating</td>
<td>600 (5.0)</td>
<td>600 (5.0)</td>
</tr>
<tr>
<td>Adhesion Promoter</td>
<td>890 (7.4)</td>
<td>890 (7.4)</td>
</tr>
<tr>
<td>Adhesive Bonding Primers: Cured at 250 °F or below</td>
<td>850 (7.1)</td>
<td>850 (7.1)</td>
</tr>
<tr>
<td>Adhesive Bonding Primers: Cured above 250 °F</td>
<td>1030 (8.6)</td>
<td>1030 (8.6)</td>
</tr>
<tr>
<td>Commercial Interior Adhesive</td>
<td>760 (6.3)</td>
<td>760 (6.3)</td>
</tr>
<tr>
<td>Cyanoacrylate Adhesive</td>
<td>1,020 (8.5)</td>
<td>1,020 (8.5)</td>
</tr>
<tr>
<td>Fuel Tank Adhesive</td>
<td>620 (5.2)</td>
<td>620 (5.2)</td>
</tr>
<tr>
<td>Nonstructural Adhesive</td>
<td>360 (3.0)</td>
<td>360 (3.0)</td>
</tr>
<tr>
<td>Rocket Motor Bonding Adhesive</td>
<td>890 (7.4)</td>
<td>890 (7.4)</td>
</tr>
<tr>
<td>Rubber-based Adhesive</td>
<td>850 (7.1)</td>
<td>850 (7.1)</td>
</tr>
<tr>
<td>Structural Autoclavable Adhesive</td>
<td>60 (0.5)</td>
<td>60 (0.5)</td>
</tr>
<tr>
<td>Structural Nonautoclavable Adhesive</td>
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<td>850 (7.1)</td>
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<tr>
<td>Antichafe Coating</td>
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<td>660 (5.5)</td>
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<td>Bearing Coating</td>
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<td>620 (5.2)</td>
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<tr>
<td>Caulking and Smoothing Compounds</td>
<td>850 (7.1)</td>
<td>850 (7.1)</td>
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<tr>
<td>Chemical Agent-Resistant Coating</td>
<td>550 (4.6)</td>
<td>550 (4.6)</td>
</tr>
<tr>
<td>Clear Coating</td>
<td>720 (6.0)</td>
<td>720 (6.0)</td>
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<tr>
<td>Commercial Exterior Aerodynamic Structure Primer</td>
<td>650 (5.4)</td>
<td>650 (5.4)</td>
</tr>
<tr>
<td>Compatible Substrate Primer</td>
<td>780 (6.5)</td>
<td>780 (6.5)</td>
</tr>
<tr>
<td>Corrosion Prevention System</td>
<td>710 (5.9)</td>
<td>710 (5.9)</td>
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<tr>
<td>Cryogenic Flexible Primer</td>
<td>645 (5.4)</td>
<td>645 (5.4)</td>
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<tr>
<td>Cryoprotective Coating</td>
<td>600 (5.0)</td>
<td>600 (5.0)</td>
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<tr>
<td>Dry Lubricative Material</td>
<td>880 (7.3)</td>
<td>880 (7.3)</td>
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<tr>
<td>Electric or Radiation-Effect Coating</td>
<td>800 (6.7)</td>
<td>800 (6.7)</td>
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<td>Electrostatic Discharge and Electromagnetic Interference (EMI) Coating</td>
<td>800 (6.7)</td>
<td>800 (6.7)</td>
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<tr>
<td>Elevated-Temperature Skydrol-Resistant Commercial Primer</td>
<td>740 (6.2)</td>
<td>740 (6.2)</td>
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<tr>
<td>Epoxy Polyamide Topcoat</td>
<td>660 (5.5)</td>
<td>660 (5.5)</td>
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<tr>
<td>Fire-Resistant (interior) Coating</td>
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<td>800 (6.7)</td>
</tr>
<tr>
<td>Flexible Primer</td>
<td>640 (5.3)</td>
<td>640 (5.3)</td>
</tr>
</tbody>
</table>

15 Coating limits for HAP are expressed in terms of mass (grams or pounds) of HAP per volume (liters or gallons) of coating less water. Coating limits for VOC are expressed in terms of mass (grams or pounds) of VOC per volume (liters or gallons) of coating less water and less exempt solvent.
<table>
<thead>
<tr>
<th>Coating Type</th>
<th>HAP Limit g/L (lb/gallon)(^{15})</th>
<th>VOC Limit g/L (lb/gallon)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flight-Test Coatings: Missile or Single Use Aircraft</td>
<td>420 (3.5)</td>
<td>420 (3.5)</td>
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<tr>
<td>Flight-Test Coatings: All Other</td>
<td>840 (7.0)</td>
<td>840 (7.0)</td>
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<tr>
<td>Fuel-Tank Coating</td>
<td>720 (6.0)</td>
<td>720 (6.0)</td>
</tr>
<tr>
<td>High-Temperature Coating</td>
<td>850 (7.1)</td>
<td>850 (7.1)</td>
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<tr>
<td>Insulation Covering</td>
<td>740 (6.2)</td>
<td>740 (6.2)</td>
</tr>
<tr>
<td>Intermediate Release Coating</td>
<td>750 (6.3)</td>
<td>750 (6.3)</td>
</tr>
<tr>
<td>Lacquer</td>
<td>830 (6.9)</td>
<td>830 (6.9)</td>
</tr>
<tr>
<td>Bonding Maskant</td>
<td>1,230 (10.3)</td>
<td>1,230 (10.3)</td>
</tr>
<tr>
<td>Critical Use and Line Sealer Maskant</td>
<td>1,020 (8.5)</td>
<td>1,020 (8.5)</td>
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<td>Seal Coat Maskant</td>
<td>1,230 (10.3)</td>
<td>1,230 (10.3)</td>
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<td>Metallized Epoxy Coating</td>
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<td>740 (6.2)</td>
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<td>Mold Release</td>
<td>780 (6.5)</td>
<td>780 (6.5)</td>
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<td>Optical Anti-Reflective Coating</td>
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<td>750 (6.3)</td>
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<td>Part Marking Coating</td>
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<td>Pretreatment Coating</td>
<td>780 (6.5)</td>
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<td>Rain Erosion-Resistant Coating</td>
<td>850 (7.1)</td>
<td>850 (7.1)</td>
</tr>
<tr>
<td>Rocket Motor Nozzle Coating</td>
<td>660 (5.5)</td>
<td>660 (5.5)</td>
</tr>
<tr>
<td>Scale Inhibitor</td>
<td>880 (7.3)</td>
<td>880 (7.3)</td>
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<tr>
<td>Screen Print Ink</td>
<td>840 (7.0)</td>
<td>840 (7.0)</td>
</tr>
<tr>
<td>Extrudable/Rollable/Brushable Sealant</td>
<td>280 (2.3)</td>
<td>280 (2.3)</td>
</tr>
<tr>
<td>Sprayable Sealant</td>
<td>600 (5.0)</td>
<td>600 (5.0)</td>
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<tr>
<td>Silicone Insulation Material</td>
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<td>850 (7.1)</td>
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<tr>
<td>Solid Film Lubricant</td>
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<td>880 (7.3)</td>
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<td>Specialized Function Coating</td>
<td>890 (7.4)</td>
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<tr>
<td>Temporary Protective Coating</td>
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<td>Thermal Control Coating</td>
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<td>800 (6.7)</td>
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<td>Wet Fastener Installation Coating</td>
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</tr>
<tr>
<td>Wing Coating</td>
<td>850 (7.1)</td>
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</tr>
</tbody>
</table>
Appendix C

NATIONAL EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES (SUBPART GG) – GUIDANCE DOCUMENT

Rule Guidance

Contents

PURPOSE AND GOALS FOR GUIDANCE

POLICY AND TECHNICAL CONTACTS

INDIVIDUAL SECTION GUIDANCE

Section 63.746(a)(2) – Standards: Handling and storage of waste.

Section 63.753(a)(5) – Reporting Requirements.
PURPOSE AND GOALS FOR GUIDANCE

This guidance addresses the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities (aerospace NESHAP). 40 CFR Part 63, Subpart GG. This document is intended for the use of the United States Environmental Protection Agency (EPA), state and local regulatory agency staff and regulated entities subject to the NESHAP and explains the intent of certain provisions. The discussion in this document is intended solely as guidance. It does not impose legally-binding requirements on the EPA, state regulators or the regulated industry. As new issues emerge on Subpart GG, this guidance will be updated at: https://www.epa.gov/stationary-sources-air-pollution/aerospace-manufacturing-and-rework-facilities-national-emission.

POLICY AND TECHNICAL CONTACTS

• Regulatory Contact: Kim Teal, (919) 541-5580
• Office of Enforcement and Compliance Assurance Contact: John Cox (202) 564-1395

SUBPART OVERVIEW

This subpart is intended to apply to only hazardous air pollutant (HAP) emissions. Specifically, organic HAP emissions from the following operations:

• Cleaning
• Depainting
• Primer application
• Topcoat application
• Specialty coating application
• Chemical milling maskant application
• Handling and storage of waste

This subpart also applies to the inorganic HAP emissions from the following operations:

• Depainting operations using dry media blasting
• Primer coating application operations using spray equipment
• Topcoat coating application operations using spray equipment
• Specialty coating application operations using spray equipment

---

1 A waste does not contain organic HAP if it meets the criteria of non-HAP material in 63.742 (i.e., waste that contains no more than 0.1 percent by mass of any individual organic HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR §1910.1200(d)(4) (2011) (currently codified at Appendix A to 29 CFR §1910.1200—Health Hazard Criteria (Mandatory), §A.6.4), and no more than 1.0 percent by mass for any other individual HAP). Note that Section 63.742 of the regulations incorrectly specifies 29 CFR 1200(d)(4), a citation that will be updated in a future technical correction.
INDIVIDUAL SECTION GUIDANCE

Section 63.748(a)(2) – Standards: Handling and storage of waste.

This section states all waste that contains organic HAP should be stored in closed containers.

This requirement is only intended for HAP-containing waste that is not subject to the Resource Conservation and Recovery Act (RCRA) requirements in 40 CFR parts 250 through 268. Once a waste is determined to be a RCRA waste, it is not then or subsequently subject to the requirements in the aerospace NESHAP.

Furthermore, our intent is to clarify that a material is not a waste requiring disposal in closed containers:

- if it does not contain “free liquids” (as defined in 40 CFR 260.10)
- if it’s within containers or liners rendered “empty” (as defined in 40 CFR 261.7) such as residues remaining in tubes, bottles, cups etc.
- Until such time that it is no longer suitable for its intended purpose. For example, a tube of adhesive that is partially used but has now set up to the point it is no longer useable.

When the material becomes a waste it must be stored in a closed container no later than the end of the work shift.

Section 63.753(a)(5) – Reporting Requirements.

This section states that if a source fails to meet an applicable standard, it must report the number of failures; date, time and duration of each failure; and a list of the affected sources or equipment with an estimate of the excess emissions as well as a description of the emission estimation methodology.

We did not provide specific methods for estimating excess emissions due to the diverse nature of affected sources and equipment in each of the facilities. We defer the estimation methodology to those most knowledgeable about the specifics of each facility. We assume that sources will be able to use readily available information, consistent with the compliance demonstrations, to estimate their excess emissions. One appropriate and familiar method for estimating emissions is the mass balance calculations, which are commonly used to demonstrate compliance for coating operations.

It is our intent that these requirements are to be met only where there was a numerical emission limit (e.g., a pounds/gallon (lb/gal) limit) as compared with a work practice standard (e.g., where a solvent-containing cloth might not have been placed in a closed container in a timely manner). This is consistent with the requirement to establish numerical emissions limits where we’re able to quantify the emissions and the discretion to establish work practice standards where it’s not feasible to quantify the emissions.
VII. Attachments

Attachments are included in the following pages. The permittee shall use these attachments, or equivalents created by the permittee, to demonstrate compliance as indicated in the permit.
**Attachment 6.170**  
Fugitive Emission Observations

This compliance worksheet may be used to meet the record keeping requirements for 10 CSR 10-6.170. This form is only a sample and the actual recordkeeping could use a different format and/or heading titles.

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>If There Are Visible Emissions Beyond the Property Boundary</th>
<th>Cause</th>
<th>Corrective Action</th>
<th>Initial</th>
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</thead>
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<td></td>
<td></td>
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<td>No</td>
<td></td>
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<td></td>
<td>Yes</td>
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<td>Yes</td>
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<td>Yes</td>
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<td></td>
<td>Yes</td>
<td>Yes</td>
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</tr>
</tbody>
</table>
**Attachment Method 22**
Visible Emission Observations

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

<table>
<thead>
<tr>
<th>Method 22 Visible Emissions Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Installation Name</td>
</tr>
<tr>
<td>Location</td>
</tr>
<tr>
<td>Sky Conditions</td>
</tr>
<tr>
<td>Precipitation</td>
</tr>
<tr>
<td>Time</td>
</tr>
</tbody>
</table>

Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.

<table>
<thead>
<tr>
<th>Minute</th>
<th>Seconds</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>15</td>
<td></td>
</tr>
<tr>
<td></td>
<td>30</td>
<td></td>
</tr>
<tr>
<td></td>
<td>45</td>
<td></td>
</tr>
</tbody>
</table>

Visible Emissions Yes (Y) or No (N)

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.
**Attachment Method 9**
Method 9 Opacity Observations

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

<table>
<thead>
<tr>
<th>Method 9 Opacity Observations</th>
<th>Sketch of the observer’s position relative to the emission unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Installation Name:</td>
<td></td>
</tr>
<tr>
<td>Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Emission Unit:</td>
<td></td>
</tr>
<tr>
<td>Observer Name and Affiliation:</td>
<td></td>
</tr>
<tr>
<td>Observer Certification Date:</td>
<td></td>
</tr>
<tr>
<td>Method 9 Observation Date:</td>
<td></td>
</tr>
<tr>
<td>Height of Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Time:</td>
<td>Start of observations</td>
</tr>
<tr>
<td></td>
<td>End of observations</td>
</tr>
<tr>
<td>Distance of Observer from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Observer Direction from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Approximate Wind Direction:</td>
<td></td>
</tr>
<tr>
<td>Estimated Wind Speed:</td>
<td></td>
</tr>
<tr>
<td>Ambient Temperature:</td>
<td></td>
</tr>
<tr>
<td>Description of Sky Conditions (Presence and color of clouds):</td>
<td></td>
</tr>
<tr>
<td>Plume Color:</td>
<td></td>
</tr>
<tr>
<td>Approximate Distance Plume is Visible from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Minute</td>
<td>Seconds</td>
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<td>-------</td>
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<td>1</td>
<td>15</td>
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<td>2</td>
<td>30</td>
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<tr>
<td>3</td>
<td>45</td>
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<tr>
<td>4</td>
<td>0</td>
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<tr>
<td>5</td>
<td>15</td>
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<tr>
<td>6</td>
<td>30</td>
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<tr>
<td>7</td>
<td>45</td>
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<tr>
<td>8</td>
<td>0</td>
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<tr>
<td>9</td>
<td>15</td>
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<tr>
<td>10</td>
<td>30</td>
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<tr>
<td>11</td>
<td>45</td>
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<td>12</td>
<td>0</td>
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<tr>
<td>13</td>
<td>15</td>
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<td>14</td>
<td>30</td>
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<td>15</td>
<td>45</td>
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<td>16</td>
<td>0</td>
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<td>17</td>
<td>15</td>
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<td>18</td>
<td>30</td>
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<td>19</td>
<td>45</td>
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<td>0</td>
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<tr>
<td>29</td>
<td>15</td>
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<td>30</td>
</tr>
</tbody>
</table>

The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%. Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 40%.

Was the emission unit in compliance at the time of evaluation (yes or no)?

_________________ Signature of Observer

---

16 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
17 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
18 Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.
**Attachment Paint Booth VOC**

This compliance work sheet may be used to meet the record keeping requirements for Permit Condition Group Spray Booths-A and Permit Condition Group Spray Booths-C. This Form is only a sample and the actual record keeping may use a different format and/or heading titles.

Emission Unit

This sheet covers the month of _______________ in the year _______________.

<table>
<thead>
<tr>
<th>Material Used (name, type)</th>
<th>Amount of material used (include units)</th>
<th>Density of material used (include units)</th>
<th>VOC content (include units)</th>
<th>VOC emissions (tons)</th>
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</tr>
</tbody>
</table>

(b) Total VOC emissions calculated for this month (tons):

c) 12-month VOC emissions total from previous month’s worksheet (tons):

d) Monthly VOC emissions total from previous year’s worksheet (tons):

e) Current 12 month total of VOC emissions (tons): [(b)+(c)-(d)]

Instructions:

(a) Choose appropriate VOC calculation method for units reported:

1. If usage is in tons: \( [\text{Column 2}] \times [\text{Column 4}] = [\text{Column 5}] \)
2. If usage is in pounds: \( [\text{Column 2}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}] \)
3. If usage is in gallons: \( [\text{Column 2}] \times [\text{Column 3}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}] \)

(b) Summation of Column 5.

d) 12-month VOC emissions total from previous month’s worksheet (tons).

d) Monthly VOC emissions total from previous year’s worksheet (tons).

(e) Calculate the new 12 month VOC emissions total.

(f) The sum of VOC emissions from the following units must be less than 77.95 tons per consecutive 12 month period to demonstrate compliance: Coating Booths (SB) 598-01 (03), (SB) 598-02 (04), (SB) 598-03/04 (05), (SB) 598-05 (02), (SB) 598-10 (01), SB 599-06 (01), and Ovens (OV) 598-01 through OV 598-02 inclusive. The total must include SSM emissions.

(g) Total VOC emissions from the Harpoon Missile Paint Booth (SB-540-01), including all alternative coating materials and cleaning solvents, and SSM emissions, must be less than 40.0 tons per consecutive 12 month period to demonstrate compliance.
STATEMENT OF BASIS

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 installation is subject to 40 CFR part 63 Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities and has potential emission greater than operating permit major source thresholds for CO, NOx, SOx, VOC, and HAPs.

Table 1: Emissions Profile, tons per year

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Reported Emissions</th>
<th>Potential Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2014</td>
<td>2015</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>1.73</td>
<td>1.74</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>2.06</td>
<td>2.07</td>
</tr>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM_{10})</td>
<td>0.27</td>
<td>0.28</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM_{2.5})</td>
<td>0.16</td>
<td>0.16</td>
</tr>
<tr>
<td>Sulfur Oxides (SOx)</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>12.12</td>
<td>18.48</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>Not Reported as HAPs(^{19})</td>
<td>&gt;10/25</td>
</tr>
</tbody>
</table>

ND=Not Determined

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 December 23, 2014; revised December 14, 2016 and May 11, 2018;
2. 2018 Emissions Inventory Questionnaire, received April 26, 2019;

\(^{19}\) The installation reports HAP emissions as PM or VOC, in accordance with 10 CSR 10-6.110.
4. webFIRE; and
5. All documents listed in Construction Permit History

**Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

See Construction Permit History, NSPS, MACT, NESHAP, and Other Regulatory Requirements sections of the Statement of Basis for detailed regulatory applicabilities.

**Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

See Construction Permit History, NSPS, MACT, NESHAP, and Other Regulatory Requirements sections of the Statement of Basis for detailed regulatory applicabilities.

**Construction Permit History**

1. The following construction permits were issued to this installation, however, all equipment associated with these permits have been removed from site. therefore these permits do not appear in the operating permit:
   - Construction Permit #0683-002
   - Construction Permit #0884-007
   - Construction Permit #0186-006A
   - Construction Permit #0487-014
   - Construction Permit #1187-001
   - Construction Permit #1287-004
   - Construction Permit #1189-013
   - Construction Permit #0290-010
   - Construction Permit #0991-002
   - Construction Permit #0792-003
   - Construction Permit #1292-016
   - Construction Permit #0294-019
   - Construction Permit #0195-020
   - Construction Permit #0396-014 and #0396-014A

2. The following construction permits were issued to this installation, and the permitted equipment is still on site; as detailed below:

   Construction Permit #0396-022
   This construction permit was issued March 2, 1996 to retrofit a vapor degreaser. Previously permitted equipment under permit numbers 0186-006A and 0487-014 have also been combined with three other grandfathered emission sources and re-permitted under this permitting action. The units contained in this permit are:
   a. Paint Booths SB-598-01, SB-598-02, SB-598-03, SB-598-04, and SB-598-05; SB-598-08, SB-598-09; and SB-599-01; which are all used to apply aerospace coatings and/or coat aerospace parts. Of these units, SB-598-08 has been removed from the site; while some other units have been renamed as detailed in the following table:
b. Spray Booth Ovens OV-598-01, OV-598-02, OV-598-03, OV-598-04, and OV-598-05; which are used to cure coatings on missile parts and circuit cards. Of these units, OV-598-03, OV-598-04, and OV-598-05 have been removed from the site.

c. Rubber Stamping RS-598-01, Vent MB-598-01, Solder pots SP-598-02; and Vapor degreaser VD-598-01; which have all been removed from the site.

Special Condition 1 was originally written to include all the emission units listed above, however, the special condition has been revised in this permit to include only the emission units that are on site. Special Conditions 2 and 3 contain supporting recordkeeping and reporting requirements, which have been revised accordingly.

Construction Permit #0997-007
This construction permit was issued July 29, 1997 for the installation of two natural gas with fuel oil backup boilers rated at 20.92 MMBtu/hr each (CS-598-01 and CS-598-02), which were initially installed in 1985. This construction permit does not contain any special conditions.

Construction Permit #092019-012
This permit was issued September 25, 2019 for the installation of a new paint booth for the production of harpoon missiles. This permit contains five special conditions, all appear in the operating permit.

New Source Performance Standards (NSPS) Applicability
40 CFR Part 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators
40 CFR Part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978
40 CFR Part 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

These regulations apply to steam generating units with the following parameters:

<table>
<thead>
<tr>
<th>Rule</th>
<th>Constructed/modified/reconstructed after…</th>
<th>Maximum design heat input capacity…</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>August 17, 1971</td>
<td>greater than 250 MMBtu/hr</td>
</tr>
<tr>
<td>Da</td>
<td>September 18, 1978</td>
<td>greater than 250 MMBtu/hr</td>
</tr>
<tr>
<td>Db</td>
<td>June 19, 1984</td>
<td>greater than 100 MMBtu/hr</td>
</tr>
<tr>
<td>Dc</td>
<td>June 19, 1984</td>
<td>between 10 and 100 MMBtu/hr</td>
</tr>
</tbody>
</table>

None of the boilers meet these applicability parameters, therefore these regulations do not apply.


These regulations apply to storage vessels with the following parameters:

<table>
<thead>
<tr>
<th>Rule</th>
<th>Constructed/modified/reconstructed …..</th>
<th>With contents and capacities…..</th>
</tr>
</thead>
<tbody>
<tr>
<td>K</td>
<td>Between June 11, 1973 and May 19, 1978</td>
<td>Petroleum liquids, &gt;40,000 gallons</td>
</tr>
<tr>
<td>Ka</td>
<td>Between May 18, 1978 and July 23, 1984</td>
<td>Petroleum liquids, &gt;40,000 gallons</td>
</tr>
<tr>
<td>Kb</td>
<td>After July 23, 1984</td>
<td>Volatile organic liquids, &gt;19,813 gallons</td>
</tr>
</tbody>
</table>

None of the storage vessels meet these applicability parameters, therefore these regulations do not apply.

40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This regulation applies to compression ignition (CI) engines constructed after July 11, 2005. None of the engines commenced construction after this date, therefore this regulation does not apply.

40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

This regulation applies to spark ignition (SI) engines constructed after June 12, 2006. None of the engines commenced construction after this date, therefore this regulation does not apply.
Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses specific solvents. The installation does not use these specific solvents, therefore this regulation does not apply.


This subpart applies to all industrial process cooling towers that have ever been 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 has never used chromium-based water treatment chemicals, therefore this regulation does not apply.

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. The Facility filter manufacturer has stated that the final stage filter is the ANESHAP compliant filter system. Replacing the pre-filter systems prior to “full load”, will prolong the life of the ANESHAP compliant filter, but in no way affects the filter efficiency of the final stage filter. The filter manufacturer has provided pre-filter change limits to ensure the longest life of the ANESHAP compliant filter and final stage ANESHAP compliant filter pressure drop limits for compliance purposes. The Facility will report pressure drop exceedances, missed readings, and malfunctions for the final stage filter, the ANESHAP compliant filter system; however, the Facility will not report for the pre-filter systems, which are not part of the ANESHAP compliant filter system.

d. Permit Condition Group Depainting-A: 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). A single wing or stabilizer does not constitute depainting of a complete aircraft. Depainting of a completed aircraft means all wings, stabilizers, and the fuselage of the aircraft must be depainted using chemical or mechanical depainting methods. The mechanical depainting portions of the permit condition only apply to the plastic and abrasive media blasters. The abrasive media blaster (GB-599-01) is out of service.

e. The requirements from §63.746(b)(4) have been included in Permit Condition Group Depainting-A since the permittee uses 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.

f. Permit Condition Group Depainting -A, Emission/Operational Limitations 6.: No additional requirements. All 40 CFR 63, Subpart A requirements are covered elsewhere in this permit condition.

g. Permit Condition Group Spray Booths – B, Emission Limitation 3.: No additional requirements. All 40 CFR 63, Subpart A requirements are covered elsewhere in this permit condition.
h. 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.

i. 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.

j. 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.

k. 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).

l. §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 SDS or other manufacturer’s data, in lieu of a calculation, provided all components have been considered.

m. This facility currently uses VOC as a surrogate to comply with the rule.

n. Clarification for training in Appendix A: Closed Container Equivalency Determination Maintenance Plan. For affected employees who experience retirement, termination, a Leave of Absence or a temporary assignment to locations other than Boeing St. Charles during the calendar year, the training requirement shall be considered complete if that employee was trained within the 12 months prior to his/her departure. Affected employees returning from a Leave of Absence or assignment outside St. Charles shall be re-trained within 6 months of return.

This subpart applies to organic liquids distribution operations at major sources of HAPs. 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. (See §63.2338 and §63.2406)

40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
This subpart applies to surface coating of miscellaneous metal parts and products located at major sources of HAPs. All coating operations at this installation meet various exemptions or in §63.3881(c). Therefore, this regulation does not apply.

40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products
This subpart applies to surface coating of plastic parts and products located at major sources of HAPs. Plastic substrates that are surface coated fall within rule exemptions for aerospace components that are within the applicability criteria for 40 CFR Subpart GG, specialty coatings used on aerospace components, research and development, building and facility maintenance, and other exemptions described in §63.4481. Therefore, this regulation does not apply.

This regulation applies to reinforced plastic composite production facilities, located at major sources of HAPs, that use using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The installation does not process styrene containing materials, therefore this regulation does not apply.

This subpart applies to stationary reciprocating internal combustion engines (RICE) that are not used for test cell/stand purposes. EG-598-03 is out of service and will comply with subpart ZZZZ if/when it is ever put into service. The applicable requirements of this regulation appear as a permit condition in the operating permit. 66.6625 (h) does not apply to engine time spent where a load is not applied for electrical generation to building infrastructure, such as during maintenance and readiness testing.

40 CFR part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters
The provisions of this subpart apply to various industrial, commercial, or institutional boiler or process heaters located at major sources of HAPs. The applicable requirements of this regulation appear as a permit condition in the operating permit.

a. Initial notification of applicable units was submitted on May 22, 2013 (107A-6742-KS)
b. Initial notification of new boilers for the units CS-508-03/-04/-05/-06 was submitted on November 11, 2013 (107A-6771-KS)
c. Initial notification of compliance for the units CS-508-03/-04/-05/-06 was submitted on December 20, 2013 (107A-6774-KS)
Unpermitted and permitted natural gas boilers CS-598-01 through -04, CS-599-01, and CS-599-02 do not have fuel oil readily available as a backup fuel. The boilers, in theory, could run on fuel oil in an emergency by bringing in a truck and performing additional maintenance on the units, but lines for fuel oil are not normally connected. If fuel oil were used, they would be subject to 63.7540(a)(10)(vi)(C).

40 CFR part 63 Subpart JJJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources

The provisions of this subpart apply to various industrial, commercial, and institutional boilers located at an area source of HAPs. This installation is a major source of HAPs, therefore this regulation does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, National Emission Standard for Asbestos

This regulation applies to the installation because of the renovation and demolition parts of the subpart which makes the subpart applicable to all sources. 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. This regulation appears in the Core Permit Requirements section of the Operating Permit.

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.

Greenhouse Gas Emissions

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO2 emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO2 emissions data by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations

10 CSR 10-5.030, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating
This regulation was rescinded from Chapter 5, with the provisions incorporated into 10 CSR 10-6.405, Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating.

10 CSR 10-5.040, Control of Emissions From Hand-Fired Equipment
This regulation applies and appears in Section IV, Core Permit Requirements.

10 CSR 10-5.060, Refuse Not to be Burned in Fuel Burning Installations
This regulation applies and appears in Section IV, Core Permit Requirements.

10 CSR 10-5.120, Information on Sales of Fuels to be Provided and Maintained
This regulation applies to usage of coal or residual fuel oil. The installation does not use these fuels, therefore this regulation does not apply.

10 CSR 10-5.130, Certain Coals to be Washed
This regulation applies to usage of coal. The installation does not use coal, therefore this regulation does not apply.

10 CSR 10-5.220, Control of Petroleum Liquid Storage, Loading and Transfer
This regulation does not apply since station gasoline tanks have a capacity of less than or equal to five hundred (500) gallons (1)(C)3.

10 CSR 10-5.295, Control of Emissions From Aerospace Manufacture and Rework Facilities
Rule applies and augmented with language from 40 CFR 63 Subpart GG and this guidance.
(https://www.epa.gov/sites/production/files/2016-12/documents/aerospace_rtr_rule_guidance.pdf) and attached as Appendix C.

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.

10 CSR 10-5.300, Control of Emissions From Solvent Metal Cleaning
There are no solvent metal cleaning or degreasing operations at this installation. Therefore, this regulation does not apply.

10 CSR 10-5.330, Control of Emission From Industrial Surface Coating Operations
The surface coating operations at this installation are subject to 10 CSR 10-5.295; and meet exemption 5.330(1)(D)8.A. Therefore, this regulation does not apply.

10 CSR 10-5.390, Control of Emission From Manufacture of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products
This installation does not manufacture paints, varnishes, lacquers, enamels, or other allied surface coating materials. Therefore, this regulation does not apply.
10 CSR 10-5.455, Control of Emissions From Industrial Solvent Cleaning Operations
This regulation has been removed from the CSR, but is contained in Missouri’s SIP. It is a federal requirement.
The cleaning operations at this installation are for aerospace coating emission units regulated under section 183(e) of the Clean Air Act, and meet exemption (1)(C)8.A. Therefore, this regulation does not apply.

10 CSR 10-5.500, Control of Emissions From Volatile Organic Liquid Storage
All volatile organic liquid storage tanks at this installation have capacities less than 40,000 gallons and meet the applicability of (1)(B)2. The applicable provisions of (4)(E) and (4)(H) have been included in the operating permit.

10 CSR 10-5.510, Control of Emissions of Nitrogen Oxides
This regulation does not apply per exemptions in (1)(C)1., (1)(C)2., and (1)(C)4.

10 CSR 10-5.520, Control of Volatile Organic Compound Emissions From Existing Major Sources
This regulation has been removed from the CSR, but is contained in Missouri’s SIP. It is a federal requirement.
This installation is subject to other regulations in Title 10, Division 10, Chapter 5 of the CSR that apply to volatile organic compound emissions from a product process, or a raw material, intermediate or product tank, and is not subject to this regulation per (1)(B). Therefore, this regulation does not apply.

10 CSR 10-5.530, Control of Volatile Organic Compound Emissions From Wood Furniture Manufacturing Operations
This regulation does not apply since Boeing is not a wood furniture manufacturer.

10 CSR 10-5.570, Control of Sulfur Emissions From Stationary Boilers
The boilers at this installation combust natural gas, liquefied petroleum gas, and/or fuel oil #2 with less than 0.5% sulfur and are not subject to this regulation per (1)(C)5. Therefore, this regulation does not apply.

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
This regulation applies and is included in the operating permit. When the current CSR version is incorporated into the SIP, all units will meet an exemption and this regulation will no longer apply.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
This regulation has been removed from the CSR, but is contained in Missouri’s SIP. It is a federal requirement.

According to (3)(B)3.B.(II), this regulation does not apply to any installation if the sulfur dioxide emissions do not exceed 2.3 lbs/MBtu heat input to the installation. The installation meets this as shown in the table below. Therefore this regulation does not apply.

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>Emission Factor by Combustion Source (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boilers and Misc. plant heating</td>
<td></td>
</tr>
<tr>
<td>Emergency generators</td>
<td></td>
</tr>
</tbody>
</table>
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions
The sulfur dioxide emission units and fuel types are shown in the table above for 10 CSR 10-6.260. Because these units combust either solely natural gas, or ultra-low distillate fuel oil with a maximum fuel content of 15 ppm, or any combination of these fuels as of December 31, 2016, the installation qualifies for the exception in (1)(A) and must comply with the recordkeeping requirements of section (4). These requirements appear in the operating permit.

10 CSR 10-6.390, Control of NOx Emissions From Large Stationary Internal Combustion Engines
The stationary internal combustion engines at this installation have capacities less than the applicability threshold of 1,300 HP. Therefore, this regulation does not apply.

10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes
This regulation does not apply since units at the site fall within exemptions in (1) (B)

10 CSR 10-6.405, Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating
All indirect heating units at this installation combust natural gas or fuel oil #2 (with less than 1.2% sulfur), and meet exemption (1)(E). Therefore, this regulation does not apply.

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)

20 The SO2 emission factor for natural gas combustion is 0.6 lb/MMSCF. Converted using heating value of 1,020 MMBtu/MMSCF (See AP 42 Table 1.4-2, footnote a)
21 See AP 42 Section 3.2, emission factor is the same for all engine types
22 The SO2 emission factor for fuel oil #2 combustion in the boilers is 142*S lb/1000 gallons. Converted using S=0.0015 (0.0015% sulfur, 15 ppm) and heating value of 140 MMBtu/1000 gallons (See 10 CSR 10-6.261 and AP 42, page 1.3-8).
23 See AP 42 Table 3.3-1
Response to Public Comments

The draft Part 70 Operating Permit for The Boeing Company was placed on public notice January 31, 2020 for a 30-day comment period. The public notice was published on the Department of Natural Resources’ Air Pollution Control Program’s web page at: https://dnr.mo.gov/env/apcp/permit-public-notices.htm. Public comments were received from Ms. Amy Algoe-Eakin, EPA Region 7 and Ms. Kristine Donaghey, The Boeing Company. The comments are addressed in the order in which they appear within the letter(s).

Comments Received from Ms. Amy Algoe-Eakin, EPA Region 7:

Comment #1: First, Emission Limitation 3. A. iii. in Permit Condition Group Handwipe Cleaning-A, requires the permittee to demonstrate that the volume of hand-wipe cleaning solvents used in affected cleaning operations has been reduced by 60% from a baseline adjusted for production. Also, the baseline shall be established as part of an approved alternative plan administered by the state, and shall be approved by the delegated state authority, and included as part of the installation's part 70 permit. However, there does not appear to be any discussion or MoDNR approval regarding the establishment of a production adjusted baseline volume of hand-wipe cleaning solvents; or any discussion of the Missouri approved alternative plan and the MoDNR approved baseline volume in this draft Part 70 Permit to Operate. The EPA recommends that MoDNR complete the requirements as specified in §63.744(b)(3).

Response to Comment #1: The permittee does not currently use these provisions of the regulation. These provisions are included in the permit condition for informational purposes, as this option is presented in the regulation. A footnote is added to the cited permit condition to provide clarifying language.

Comment #2: Second, there are several requirements in this draft Part 70 Permit to Operate that are identified, either directly or in footnotes, as "state enforceable," "federally enforceable," and/or "state and federally enforceable." 10 CSR 10-6.065(5)(C)2.A requires all terms and conditions in a Part 70 Permit to Operate, including any voluntary provisions designed to limit an installation's potential to emit, to be enforceable by the permitting authority, the administrator, and by the citizens. When the MoDNR adopted the Part 70 operating permit program, they submitted to the EPA a legal opinion stating they had the legal authority to incorporate all applicable requirements into Part 70 permits and that they have adequate authority to enforce permits. This would appear to indicate that, once a requirement is in the Part 70 permit, there are no "federally-enforceable-only" permit requirements. There is, however, "state enforceable" permit requirements as allowed pursuant to 10 CSR 10-6.065(5)(C)2.B, providing the terms and conditions designated as "state only" are not required under the Clean Air Act or any of its applicable requirements. Therefore, the EPA recommends the MoDNR reconsider the use of the terms "state enforceable," "federally enforceable," and "state and federally enforceable" as found on pages 35, 36, 38, 43, 44, 45, 46, 47, 48, 50, SB-10 and SB-11.

Response to Comment #2: The cited permit language is changed to “state requirement”, “federal requirement”, or “state and federal requirement”, as suitable for each cited circumstance, to more closely align with the intent of 10 CSR 10-6.065(5)(C)2.A. and B.
Comment #3: Finally, the installation address on the cover page of this draft Part 70 Permit to Operate indicates St. Louis as the city for this Boeing installation. However, the EPA believes this Boeing Company installation is in St. Charles, and the EPA suggests the MoDNR consider correcting the installation address on the cover page of this Part 70 Permit to Operate.

Response to Comment #3: The installation address is changed to St. Charles, MO 63301.

Comments Received from Ms. Kristine Donaghey, The Boeing Company

Comment #1: Due to internal reorganization, our Responsible Officials have changed. Please update the permit to indicate the following Responsible Officials and Alternate Signators:

Paisley Matthews
Vice President
Strike, Surveillance, & Mobility & St. Louis Site Leader

Steve Newman
Director, SSM Integration

Richard Smith
Senior Manager
Environment, Health, & Safety

Response to Comment #1: The operating permit is updated as requested.

Comment #2: Please incorporate the following changes to the storage tanks listed below:
1. Change the emission point designation of ST-598-03 to ST-509-02,
2. Change the emission point designation of ST-506-01 to ST-509-01,
3. Remove ST-507-01 from the permit as it has been removed from the site,
4. Add ST-509-03, a 250 gallon gasoline AST, which is expected to be installed within the next few months.

Response to Comment #2: The operating permit is updated as requested.