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: OP2018-026
Expiration Date: MAR 13 2023
Installation ID: 105-0006
Project Number: 2017-09-007

Installation Name and Address
Brunswick Freshwater Group - Lebanon
Missouri Facility
2900 Industrial Drive
Lebanon, MO 65536
Laclede County

Parent Company's Name and Address
Brunswick Corporation
26125 N. Riverwoods Blvd. Suite 500
Mettawa IL, 60045

Installation Description:
Brunswick Freshwater Group operates an aluminum boat manufacturing plant in Lebanon, Missouri. The major operations at the installation are metal fabrication, woodworking, surface coating, adhesive application, drying ovens, and general assembly and storage of finished units. This source is considered a major source for volatile organic compounds (VOC) and hazardous air pollutants (HAP), specifically Xylenes. The installation is not on the list of Named Sources and is located in an attainment area for all criteria pollutants. It is subject to 40 CFR Part 63, Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

Prepared by
Justin Spasovski
Operating Permit Unit

Director or Designee
Department of Natural Resources

MAR 13 2018
Effective Date
# Table of Contents

I. **INSTALLATION EQUIPMENT LISTING** ................................................................. 4

EMISSION UNITS WITH LIMITATIONS ........................................................................... 4
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS ...................................................... 4

II. **PLANT WIDE EMISSION LIMITATIONS** ............................................................ 5

PERMIT CONDITION PW001 .......................................................................................... 5
  10 CSR 10-6.060, Construction Permits Required ....................................................... 5
  Construction Permit 072010-008, issued July 22, 2010 ............................................... 5

III. **EMISSION UNIT SPECIFIC EMISSION LIMITATIONS** ....................................... 6

PERMIT CONDITION 001 .............................................................................................. 6
  10 CSR 10-6.060 Construction Permits Required .......................................................... 6
  Construction Permit 1097-005, issued October 6, 1997 .............................................. 6
  10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes .......................................................... 6

PERMIT CONDITION 002 .............................................................................................. 7
  10 CSR 10-6.060 Construction Permits Required .......................................................... 7
  Construction Permit 072010-008, issued July 22, 2010 .............................................. 7
  Construction Permit Amendment 072010-008B, issued December 20, 2017 ............. 7
  10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes .......................................................... 7

PERMIT CONDITION 003 .............................................................................................. 9
  10 CSR 10-6.060 Construction Permits Required .......................................................... 9
  Construction Permit 082015-010, issued August 18, 2015 ....................................... 9
  10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes .......................................................... 9

PERMIT CONDITION 004 .............................................................................................. 10
  10 CSR 10-6.060, Construction Permits Required .......................................................... 10
  Construction Permit Amendment 082015-010A, issued June 19, 2017 ..................... 10

PERMIT CONDITION 005 .............................................................................................. 11
  10 CSR 10-6.075, Maximum Achievable Control Technology; ............................... 11
  40 CFR Part 63, Subpart A General Provisions; and .................................................... 11

PERMIT CONDITION 006 .............................................................................................. 18
  10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminates ..................... 18

IV. **CORE PERMIT REQUIREMENTS** ...................................................................... 20

V. **GENERAL PERMIT REQUIREMENTS** .............................................................. 25

VI. **ATTACHMENTS** ............................................................................................... 30

ATTACHMENT A ......................................................................................................... 31
  Fugitive Emission Observations .................................................................................... 31

ATTACHMENT B ......................................................................................................... 32
  Visible Emission Observations ...................................................................................... 32

ATTACHMENT C ......................................................................................................... 33
  Method 9 Opacity Emissions Observations .................................................................... 33

ATTACHMENT D ......................................................................................................... 34
  Inspection/Maintenance/Repair/Malfunction Log .......................................................... 34

ATTACHMENT E ......................................................................................................... 35
  VOC Compliance Worksheet ......................................................................................... 35
ATTACHMENT F

Pressure Drop Records
I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-19</td>
<td>Welding</td>
</tr>
<tr>
<td>EP-20</td>
<td>Plasma Cutting</td>
</tr>
<tr>
<td>EU0010</td>
<td>Plywood Cutting</td>
</tr>
<tr>
<td>EU0020</td>
<td>Paint Room #1- Primer Booth</td>
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<tr>
<td>EU0030</td>
<td>Paint Room #1- Top Coat Booth</td>
</tr>
<tr>
<td>EU0040</td>
<td>Paint Room #2- Primer Booth</td>
</tr>
<tr>
<td>EU0050</td>
<td>Paint Room #3 Topcoat Booth</td>
</tr>
<tr>
<td>EU0060</td>
<td>Paint Room #2 Multi-Purpose Booth</td>
</tr>
<tr>
<td>EU0070</td>
<td>Boat Assembly/ Solvent Usage</td>
</tr>
<tr>
<td>EU0080</td>
<td>Other Cleaning Solutions</td>
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<tr>
<td>EU0090</td>
<td>Carpet Gluing 12</td>
</tr>
<tr>
<td>EU0100</td>
<td>Carpet Gluing 12A</td>
</tr>
<tr>
<td>EU0110</td>
<td>Carpet Gluing 12B</td>
</tr>
<tr>
<td>EU0120</td>
<td>Non-Carpet/Fabric Adhesive Operations</td>
</tr>
<tr>
<td>EU0130</td>
<td>Paint Room #1 – Drying Oven</td>
</tr>
<tr>
<td>EU0140</td>
<td>Paint Room #3 – Paint Booth Drying Oven</td>
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<td>EU0150</td>
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<tr>
<td>EU0160</td>
<td>Paint Room #3 – Wash Booth Drying Oven</td>
</tr>
<tr>
<td>EU0170</td>
<td>Drying Oven</td>
</tr>
<tr>
<td>EU0180</td>
<td>Paint Room # 2-Spray Booth</td>
</tr>
<tr>
<td>EU0190</td>
<td>Paint Room # 2-Spray Booth Camo</td>
</tr>
<tr>
<td>EU0200</td>
<td>Paint Room # 3-Spray Booth Primer</td>
</tr>
<tr>
<td>EU0210</td>
<td>Paint Room # 3-Multi-Purpose Booth</td>
</tr>
<tr>
<td>EU0220</td>
<td>Burn Off Oven Paint Hooks</td>
</tr>
<tr>
<td>EU0230</td>
<td>Powder Coating System Dry Off/Curing Oven and Water Heater</td>
</tr>
<tr>
<td>EU0240</td>
<td>Powder Coat Paint Booth</td>
</tr>
<tr>
<td>EU0250</td>
<td>Space Heating</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.

Description of Emission Source
Three wash booths
Four spray foam dispensers
II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001
10 CSR 10-6.060, Construction Permits Required
Construction Permit 072010-008, issued July 22, 2010

Operational Requirement:
The permittee shall keep all VOC and HAP emitting solvents, paints, and cleaning solutions in closed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all VOC and HAP emitting solvent, paints and cleaning solution containers used with this equipment. [Special Condition 5.]

Recordkeeping/Reporting:
1) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request
2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification as required in Section V of this permit.
III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001
10 CSR 10-6.060 Construction Permits Required
Construction Permit 1097-005, issued October 6, 1997
10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Control #</th>
<th>Control Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU0010</td>
<td>Plywood Cutting</td>
<td>CD-01</td>
<td>Fabric Filter</td>
</tr>
<tr>
<td>EU0020</td>
<td>Paint Room #1- Primer Booth</td>
<td>CD-02</td>
<td>Mat Filter</td>
</tr>
<tr>
<td>EU0030</td>
<td>Paint Room #1- Top Coat Booth</td>
<td>CD-03</td>
<td>Mat Filter</td>
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<td>EU0040</td>
<td>Paint Room #2- Primer Booth</td>
<td>CD-04</td>
<td>Mat Filter</td>
</tr>
<tr>
<td>EU0050</td>
<td>Paint Room #3 Topcoat Booth</td>
<td>CD-06</td>
<td>Mat Filter</td>
</tr>
<tr>
<td>EU0060</td>
<td>Paint Room #2 Multi-Purpose Booth</td>
<td>CD7</td>
<td>High Efficiency Filters</td>
</tr>
<tr>
<td>EU0090</td>
<td>Carpet Gluing 12</td>
<td>CD-05</td>
<td>Overspray Collection Wall</td>
</tr>
<tr>
<td>EU0100</td>
<td>Carpet Gluing 12A</td>
<td>CD-05</td>
<td>Overspray Collection Wall</td>
</tr>
<tr>
<td>EU0110</td>
<td>Carpet Gluing 12B</td>
<td>CD-05</td>
<td>Overspray Collection Wall</td>
</tr>
</tbody>
</table>

Operational Limitations:
1) The fabric filter (CD-01) on the plywood cutting process (EU0010) and paint and glue overspray collection systems (CD-02, CD-03, CD-04, CD-05, CD-06, & CD7) shall be in use at all times when the associated processes are in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 3.]
2) The fabric filter shall be equipped with a gauge or meter which indicates the pressure drop across it. This gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. [Special Condition 3]
3) The paint and glue particulate mat or panel filters shall be replaced as deemed necessary by visual inspection. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 3]
4) Booths shall not be operated without a mat/panel filter in place.

Monitoring/Recordkeeping:
1) The permittee shall check and document the baghouse pressure drops daily, whenever the emission unit is in operation. If either pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal. The permittee shall use Attachment F, or equivalent, to satisfy this requirement.
2) The permittee shall conduct monitoring and maintenance on the baghouse. The permittee shall use Attachment D, or equivalent to document the following:
a) Check and document the cleaning sequence of the dust collector every six months.
b) Inspect bags for leaks and wear every six months.
c) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months.

3) The permittee shall maintain a written record of all observations, deficiencies and any action resulting from inspections.
4) The permittee shall inspect the filters for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
5) The permittee shall inspect the filters each shift before spraying begins and after installation of a new filter.
6) The permittee shall install and replace the filters according to the manufacturer’s recommendations, which shall be kept on site.
7) 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:**
The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification as required in Section V of this permit.

### PERMIT CONDITION 002

<table>
<thead>
<tr>
<th>10 CSR 10-6.060 Construction Permits Required</th>
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<tbody>
<tr>
<td>Construction Permit 072010-008, issued July 22, 2010</td>
</tr>
<tr>
<td>Construction Permit Amendment 072010-008B, issued December 20, 2017</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Control #</th>
<th>Control Description</th>
</tr>
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<tbody>
<tr>
<td>EU0180</td>
<td>Paint Room # 2-Spray Booth</td>
<td>CD8</td>
<td>High Efficiency Filters</td>
</tr>
<tr>
<td>EU0190</td>
<td>Paint Room # 2-Spray Booth Camo</td>
<td>CD9</td>
<td>High Efficiency Filters</td>
</tr>
<tr>
<td>EU0200</td>
<td>Paint Room # 3-Spray Booth Primer</td>
<td>CD10</td>
<td>High Efficiency Filters</td>
</tr>
<tr>
<td>EU0210</td>
<td>Paint Room # 3-Multi-Purpose Booth</td>
<td>CD11</td>
<td>High Efficiency Filters</td>
</tr>
</tbody>
</table>

### Operational Limitations:

1) **Use of Alternative Coatings in Paint Booths**
   a) When considering an alternative material in the new paint booth that is different than a material listed in the Application for Authority to Construct, the permittee shall calculate the potential emissions of volatile organic compounds (VOCs) and each individual HAP in the alternative material for the project. [072010-008 Special Condition 3.A.]
   b) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases:
      i) If the project’s potential VOC emissions with the use of an alternative material is equal to or greater than 100.9 tons per year (tpy). [072010-008 Special Condition 3.B.1.]
      ii) If the potential individual HAP emissions for the alternative material is equal to or greater than the Screening Model Action Levels (SMAL) for any compound listed in *Air Pollution Control Program, Table of Hazardous Air Pollutants, Screening Model Action Levels, and Risk Assessment Levels*, published on the department of Natural Resources’ Air Pollution...
2) Control Device Requirements
   a) The permittee shall control emissions from each spray gun using a paint booth equipped with
      high efficiency filters. The paint booths (EU0180, EU0190, EU0200, and EU0210) and high
      efficiency filters (CD8, CD9, CD10, and CD11) shall be maintained in accordance with the
      manufacturer’s specifications. Replacement filters shall be kept on hand at all times.
      [072010-008B Special Condition 2.A.]
   b) Only four spray guns may be operated in each paint booth (EU0180, EU0190, EU0200, and
      EU0210) at a time. [072010-008B Special Condition 2.B.]
   c) The permittee shall not replace the spray guns or modify the spray guns such that the current
      application rates as given in the application are exceeded. [072010-008B Special Condition 2.C.]

Monitoring/Recordkeeping:
1) The permittee shall use Attachment E or an equivalent recordkeeping page to show compliance.
   [072010-008 Special Condition 3.C.]
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:
The permittee shall report any deviations from the monitoring, recordkeeping, and reporting
requirements of this permit condition in the semi-annual monitoring report and annual compliance
certification as required in Section V of this permit.
PERMIT CONDITION 003
10 CSR 10-6.060 Construction Permits Required
Construction Permit 082015-010, issued August 18, 2015
10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Control #</th>
<th>Control Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU0220</td>
<td>Burn Off Oven Paint Hooks</td>
<td>CD12</td>
<td>Afterburner</td>
</tr>
</tbody>
</table>

Operational Limitations:
1) The permittee shall remove only non-chlorinated, non-hazardous coating from metal parts with the burn-off oven. [Special Condition 1.A.]
2) The burn-off oven shall be limited to combust natural gas as fuel. [Special Condition 1.B.]
3) The permittee shall use a direct flame afterburner to control emissions from the burn-off oven. The afterburner shall be operated at a minimum of 1,400 degrees Fahrenheit with more than a one-half (1/2) second residence time to assure a minimum combustion efficiency of 99.9%. [Special Condition 1.C.]
4) The burn-off oven shall be equipped with an electronic controlled temperature gauge with digital readout, which is able to monitor and display the temperature in the second combustion chamber to an accuracy of plus or minus two percent (2%). [Special Condition 1.D.]

Monitoring/Recordkeeping:
1) The permittee shall record the temperature of the burn-off oven from the temperature gauge at least once every 30 operating days.
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. [Special Condition 2.A.]
3) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit. [Special Condition 2.B.]
4) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification as required in Section V of this permit.
PERMIT CONDITION 004
10 CSR 10-6.060, Construction Permits Required
Construction Permit Amendment 082015-010A, issued June 19, 2017

<table>
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<tr>
<th>Emission Unit</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>EU0020</td>
<td>Paint Room #1 – Primer Booth</td>
</tr>
<tr>
<td>EU0030</td>
<td>Paint Room #1 – Top Coat Booth</td>
</tr>
<tr>
<td>EU0040</td>
<td>Paint Room #2 – Primer Booth</td>
</tr>
<tr>
<td>EU0050</td>
<td>Paint Room #3 – Top Coat Booth</td>
</tr>
<tr>
<td>EU0060</td>
<td>Paint Room #2 – Multipurpose Booth</td>
</tr>
<tr>
<td>EU0070</td>
<td>Boat Assembly/Solvent Usage</td>
</tr>
<tr>
<td>EU0080</td>
<td>Other Cleaning Solutions</td>
</tr>
<tr>
<td>EU0090</td>
<td>Carpet Gluing 12</td>
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<tr>
<td>EU0100</td>
<td>Carpet Gluing 12A</td>
</tr>
<tr>
<td>EU0110</td>
<td>Carpet Gluing 12B</td>
</tr>
<tr>
<td>EU0120</td>
<td>Non-Carpet/Fabric Adhesive Operations</td>
</tr>
<tr>
<td>EU0130</td>
<td>Paint Room #1 – Drying Oven</td>
</tr>
<tr>
<td>EU0140</td>
<td>Paint Room #3 – Paint Booth Drying Oven</td>
</tr>
<tr>
<td>EU0150</td>
<td>Paint Room #2 – Drying Oven</td>
</tr>
<tr>
<td>EU0160</td>
<td>Paint Room #3 – Wash Booth Drying Oven</td>
</tr>
<tr>
<td>EU0170</td>
<td>Drying Oven</td>
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<tr>
<td>EU0180</td>
<td>Paint Room #2-Spray Booth</td>
</tr>
<tr>
<td>EU0190</td>
<td>Paint Room #2-Spray Booth Camo</td>
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<tr>
<td>EU0210</td>
<td>Paint Room #3-Multi-Purpose Booth</td>
</tr>
<tr>
<td>EU0220</td>
<td>Burn-off Oven</td>
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<tr>
<td>EU0230</td>
<td>Powder Coating System Dry Off/Curing Oven and Water Heater</td>
</tr>
<tr>
<td>EU0240</td>
<td>Powder Coat Paint Booth</td>
</tr>
<tr>
<td>EU0250</td>
<td>Space Heating</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
The permittee shall emit less than 235.0 tons of VOCs in any consecutive 12-month period from the entire installation as defined by Table 1. [Special Condition 2.A.]

**Monitoring/Recordkeeping:**
1) The permittee shall maintain accurate records of actual monthly and 12-month rolling total VOC emissions using Attachment E or an equivalent form. [Special Condition 2.B.]
2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. The records shall include Safety Data Sheets (SDS) for all materials used. [Special Condition 6.A.]
3) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit. [Special Condition 6.B.]
4) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification as required in Section V of this permit.

**PERMIT CONDITION 005**


<table>
<thead>
<tr>
<th>Emission Unit</th>
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<tr>
<td>EU0020</td>
<td>Paint Room #1- Primer Booth</td>
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<tr>
<td>EU0030</td>
<td>Paint Room #1- Top Coat Booth</td>
</tr>
<tr>
<td>EU0040</td>
<td>Paint Room #2- Primer Booth</td>
</tr>
<tr>
<td>EU0050</td>
<td>Paint Room #3 Topcoat Booth</td>
</tr>
<tr>
<td>EU0060</td>
<td>Paint Room #2 Multi-Purpose Booth</td>
</tr>
<tr>
<td>EU0070</td>
<td>Boat Assembly/ Solvent Usage</td>
</tr>
<tr>
<td>EU0080</td>
<td>Other Cleaning Solutions</td>
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<td>EU0090</td>
<td>Carpet Gluing 12</td>
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<td>Carpet Gluing 12A</td>
</tr>
<tr>
<td>EU0110</td>
<td>Carpet Gluing 12B</td>
</tr>
<tr>
<td>EU0180</td>
<td>Paint Room # 2-Spray Booth</td>
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<tr>
<td>EU0200</td>
<td>Paint Room # 3-Spray Booth Primer</td>
</tr>
<tr>
<td>EU0210</td>
<td>Paint Room # 3-Multi-Purpose Booth</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

1) *Carpet and Fabric Adhesives:* The permittee must use carpet and fabric adhesives that contain no more than five (5) percent organic HAP by weight. [§63.5740(a)]

2) *Aluminum Wipedown Solvent Operations and Aluminum Surface Coating Operations:* For aluminum wipedown solvent operations and aluminum surface coating operations, the permittee must comply with the combined emission limit in §63.5743(a)(3). Compliance with this limitation is based on a 12-month rolling average that is calculated at the end of every month. [§63.5743(a)]
   a) The permittee must limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. [§63.5743(a)(3)]

3) The permittee must comply with the work practice standard in §63.5743(b)(2) when cleaning aluminum coating spray guns with solvents containing more than five percent organic HAP by weight. [§63.5743(b)]
   a) The permittee must disassemble the spray gun and manually clean the components in a vat. The permittee must keep the vat closed when it is not in use. [§63.5743(b)(2)]

**Monitoring:**

1) *Carpet and Fabric Adhesives:* To demonstrate compliance with the carpet and adhesive emission limitation in §63.5740(a), the permittee must determine the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758. [§63.5740(b)]
2) **Aluminum Wipedown Solvent Operations and Aluminum Surface Coating Operations:** To demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings specified in §63.5743(a), the permittee must meet the requirements of §63.5746(a) through (f) listed below. [§63.5746]

a) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in §63.5758 to determine organic HAP content. [§63.5746(a)]

b) Use the methods in §63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. The permittee shall keep records of the solids content. [§63.5746(b)]

c) Use the methods in §63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent. [§63.5746(c)]

d) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in §63.5695. [§63.5746(d)]

e) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use the procedures in §63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in §63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids. [§63.5746(e)]

f) Keep records of the calculations used to determine compliance. [§63.5746(f)]

2) **Approval of alternative means of demonstrating compliance.** The permittee may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in §63.5743(a). [§63.5746(g)]

a) The application must include the information listed in §63.5746(g)(1)(i) through (iii). [§63.5746(g)(1)]

i) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in §63.5746(a) through (e). The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made. [§63.5746(g)(1)(i)]

ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test. [§63.5746(g)(1)(ii)]

iii) Details of appropriate recordkeeping and reporting procedures. [§63.5746(g)(1)(iii)]

b) The director will approve the alternative means of limiting emissions if the director determines that HAP emissions will be no greater than if the source uses the procedures described in §63.5746(a) through (e) to demonstrate compliance. [§63.5746(g)(2)]

c) The director's approval may specify operation, maintenance, and monitoring requirements to ensure that emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with Subpart VVVV. [§63.5746(g)(3)]
Compliance Demonstration/Calculations:

1) **Calculating Organic HAP Content of Aluminum Wipedown Solvents:** The permittee shall use equation 1 to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months. [§63.5749(a)]

\[
HAP_{WD} = \frac{\sum_{j=1}^{n} (Vol_j)(D_j)(W_j)}{\sum_{i=1}^{m} (Vol_i)(Solids_i)} \quad (Equation 1)
\]

Where:
- \(HAP_{WD}\) = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.
- \(n\) = number of different wipedown solvents used in the past 12 months.
- \(Vol_j\) = volume of aluminum wipedown solvent \(j\) used in the past 12 months, liters.
- \(D_j\) = density of aluminum wipedown solvent \(j\), kilograms per liter.
- \(W_j\) = mass fraction of organic HAP in aluminum wipedown solvent \(j\).
- \(m\) = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.
- \(Vol_i\) = volume of aluminum primer, top coat, or clear coat \(i\) used in the past 12 months, liters.
- \(Solids_i\) = solids content aluminum primer, top coat, or clear coat \(i\), liter solids per liter of coating.

2) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then the permittee is in compliance with the emission limit specified in §63.5743(a)(1). [§63.5749(b)]

3) **Calculating Organic HAP Content for All Aluminum Surface Coatings:** The permittee shall use equation 2 to calculate the weighted-average HAP content for all aluminum surface coatings used in the past 12 months. [§63.5752(a)]

\[
HAP_{SC} = \frac{\sum_{i=1}^{m} (Vol_i)(D_i)(W_i) + \sum_{k=1}^{p} (Vol_k)(D_k)(W_k)}{\sum_{i=1}^{m} (Vol_i)(Solids_i)} \quad (Equation 2)
\]

Where:
- \(HAP_{SC}\) = weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.
- \(m\) = number of different aluminum primers, top coats, and clear coats used in the past 12 months.
- \(Vol_i\) = volume of aluminum primer, top coat, or clear coat \(i\) used in the past 12 months, liters.
- \(D_i\) = density of coating \(i\), kilograms per liter.
- \(W_i\) = mass fraction of organic HAP in coating \(i\), kilograms of organic HAP per kilogram of coating.
- \(p\) = number of different thinners, activators, and other coating additives used in the past 12 months.
- \(Vol_k\) = total volume of thinner, activator, or additive \(k\) used in the past 12 months, liters.
D_k = density of thinner, activator, or additive k, kilograms per liter.
W_k = mass fraction of organic HAP in thinner, activator, or additive k, kilograms of organic HAP per kilogram of thinner or activator.
Solids_i = solids content of aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

4) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then the permittee is in compliance with the emission limit specified in §63.5743(a)(2). [§63.5752(b)]

5) Calculating Combined Organic HAP Content of Aluminum Wipedown Solvents and Aluminum Recreational Boat Surface Coatings: The permittee shall use equation 3 to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings. [§63.5753(a)]

\[ HAP_{Combined} = HAP_{WD} + HAP_{SC} \]  
(Equation 3)

Where:
- HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1 of §63.5749.
- HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 1 of §63.5752.

6) Compliance is based on a 12-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then the permittee is in compliance with the emission limit specified in §63.5743(a)(3). [§63.5753(b)]

7) Aluminum Coating Spray Gun Cleaning Work Practice Standards: The permittee must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of §63.5755(b). [§63.5755]

   a) For solvents containing more than five percent organic HAP by weight, comply with the requirements in §63.5755(b)(2) and §63.5755(b)(3). [§63.5755(b)]
      i) When manually cleaning the gun or spraying solvent into a container that can be closed, the permittee shall visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps. [§63.5755(b)(2)]
      ii) The permittee shall keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers. [§63.5755(b)(3)]

8) Determining Organic HAP Content: To determine the organic HAP content for each material used, §63.5758(a)(5) must be used. [§63.5758(a)]

   a) Information from the supplier or manufacturer of the material. The permittee may rely on information other than that generated by the test methods specified in §63.5758(a)(1) through (4), such as manufacturer's formulation data, according to §63.5758(a)(5)(i) through (iii) listed below. [§63.5758(a)(5)]
      i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at one percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the permittee does not have to include it in the organic HAP total. [§63.5758(a)(5)(i)]
      ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee must use the upper limit of the range for determining compliance. If a
separate measurement of the total organic HAP content using the methods specified in §63.5758(a)(1) through (4) exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance. [§63.5758(a)(5)(ii)]

iii) If the organic HAP content is provided as a single value, the permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in §63.5758(a)(1) through (4) is less than two percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by two percentage points or more, then the permittee must use the measured organic HAP content to determine compliance. [§63.5758(a)(5)(iii)]

9) Determining Volume Fraction of Coating Solids in Aluminum Recreational Boat Surface Coatings:
To determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each aluminum recreational boat surface coating, the permittee must use one of the methods specified in §63.5758(b)(1) through (3). If the results obtained with §63.5758(b)(2) or (3) do not agree with those obtained according to §63.5758(b)(1), the permittee must use the results obtained with §63.5758(b)(1) to determine compliance. [§63.5758(b)]

a) ASTM Method D2697-86(1998) or D6093-97. The permittee may use ASTM Method D2697-86(1998) or D6093-97 (available for purchase from ASTM) to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.5758(b)(1)]

b) Information from the supplier or manufacturer of the material. The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.5758(b)(2)]

c) Calculation of volume fraction of coating solids. The permittee may determine it using equation 4: [§63.5758(b)(3)]

\[
\text{Solids} = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \\
\text{Equation 4}
\]

Where:
- Solids = volume fraction of coating solids, liters coating solids per liter coating.
- \(m_{\text{volatiles}}\) = Total volatile matter content of the coating, including organic HAP, volatile organic compounds, water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR Part 60, grams volatile matter per liter coating.
- \(D_{\text{avg}}\) = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-90 (available for purchase from ASTM), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-90 test results and other information sources, the test results will take precedence.

10) Determining Density of Aluminum Recreational Boat Wipedown Solvents: Determine the density of all aluminum recreational boat wipedown solvents, surface coatings, thinners, and other additives from test results using ASTM Method D1475-90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If
there is disagreement between ASTM Method D1475-90 test results and other information sources, the permittee must use the test results to demonstrate compliance. [§63.5758(c)]

**Recordkeeping:**
1) The permittee must record the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758. [§63.5740(b)]
2) The permittee must keep records of the solids contents (liters of solid per liter of coating, or volume fraction) of each aluminum surface coating, including primers, top coats, and clear coats. [§63.5746(b)]
3) The permittee must keep records of the calculations used to determine compliance. [§63.5746(f)]
4) The permittee must keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers. [§63.5755(b)(3)]
5) The permittee must keep a copy of each notification and report that is submitted to comply with Subpart VVVV. [§63.5767(a)]
6) The permittee must keep all documentation supporting any notification or report that is submitted. [§63.5767(b)]
7) The permittee must keep records of the total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in §63.5752. [§63.5767(c)(2) and §63.5746(a)]
8) The permittee must keep records of the total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in §63.5749. [§63.5767(c)(3)]
9) The permittee’s records must be readily available and in a form so they can be easily inspected and reviewed. [§63.5770(a)]
10) The permittee must keep each record for five years following the date that each record is generated. [§63.5770(b)]
11) The permittee must keep each record on site for at least two years after the date that each record is generated. The records can be kept offsite for the remaining three years. [§63.5770(c)]
12) The permittee can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche. [§63.5770(d)]

**Reporting:**
1) The permittee must submit all of the notifications that apply to the permittee in Table 7 of Subpart VVVV. The notifications are described more fully in 40 CFR Part 63, Subpart A, General Provisions, referenced in Table 8 to Subpart VVVV. [§63.5761(a)]
2) If the permittee changes any information submitted in any notification, the permittee must submit the changes in writing to the director within 15 calendar days after the change. [§63.5761(b)]
3) The permittee must submit the applicable reports specified in §63.5764(b) through (e). To the extent possible, the permittee must organize each report according to the operations covered by Subpart VVVV and the compliance procedure followed for that operation. [§63.5764(a)]
4) Unless the director has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the dates in §63.5764(b)(1) through (5). [§63.5764(b)]
   a) Each subsequent compliance report must cover the applicable semi-annual reporting period from January 1 through June 30 or from July 1 through December 31. [§63.5764(b)(1)]
   b) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semi-annual reporting period. [§63.5764(b)(2)]
   c) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70, and if the permitting authority has established dates for submitting semi-annual reports pursuant to
40 CFR 70.6(a)(3)(ii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in §63.5764(b)(1) through (4). [§63.5764(b)(5)]

5) The compliance report must include the information specified in §63.5764(c)(1) through (7).

[§63.5764(c)]

a) Company name and address. [§63.5764(c)(1)]

b) A statement by a responsible official with that official’s name, title, and signature, certifying the truth, accuracy, and completeness of the report. [§63.5764(c)(2)]

c) The date of the report and the beginning and ending dates of the reporting period. [§63.5764(c)(3)]

d) A description of any changes in the manufacturing process since the last compliance report. [§63.5764(c)(4)]

e) A statement or table showing, for each regulated operation, the applicable organic HAP content limit or the application equipment requirement with which the permittee is complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period. [§63.5764(c)(5)]

f) If the permittee was in compliance with the emission limits and work practice standards during the reporting period, the permittee must include a statement to that effect. [§63.5764(c)(6)]

g) If the permittee deviated from an emission limit or work practice standard during the reporting period, the permittee must also include the information listed in §63.5764(c)(7)(i) through (iv) in the semi-annual compliance report. [§63.5764(c)(7)]

i) A description of the operation involved in the deviation. [§63.5764(c)(7)(i)]

ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation. [§63.5764(c)(7)(ii)]

iii) A description of any corrective action the permittee took to minimize the deviation and actions that have been taken to prevent it from happening again. [§63.5764(c)(7)(iii)]

iv) A statement of whether or not the permittee was in compliance for the 12-month averaging period that ended at the end of the reporting period. [§63.5764(c)(7)(iv)]
### PERMIT CONDITION 006
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminates

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Stack ID</th>
<th>Description</th>
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<tr>
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<td>Paint Room #1- Primer Booth</td>
</tr>
<tr>
<td>EU0030</td>
<td>52</td>
<td>Paint Room #1- Top Coat Booth</td>
</tr>
<tr>
<td>EU0040</td>
<td>70</td>
<td>Paint Room #2- Primer Booth</td>
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<tr>
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<td>Paint Room # 2-Spray Booth</td>
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<tr>
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<td>EU0190</td>
<td>Paint Room # 2-Spray Booth Camo</td>
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<tr>
<td>EU0200</td>
<td>EU0200</td>
<td>Paint Room # 3-Spray Booth Primer</td>
</tr>
<tr>
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<td>EU0210</td>
<td>Paint Room # 3-Multi-Purpose Booth</td>
</tr>
<tr>
<td>EU0240</td>
<td></td>
<td>Powder Coat Paint Booth</td>
</tr>
</tbody>
</table>

**Emissions Limitation:**

1) The permittee shall not cause or permit to be discharged into the atmosphere from any emission unit any visible emissions greater than 20% for any continuous six minute period. [6.220(3)(A)1.]

2) Exceptions allowed in one continuous six minute period: The permittee may emit 40% opacity for one continuous six-minute period in any sixty minutes. [6.220(3)(A)2.]

**Monitoring:**

1) The permittee shall conduct visible emissions observations on each emission unit using USEPA Test Method 22 like procedures. The permittee is only required to make observations when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible emissions, then a Method 9 observation is not required. For emission units with visible emissions, the source representative would then conduct a Method 9 observation.

2) The permittee must maintain the following monitoring schedule. Issuance of a renewal operating permit does not restart this schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
   b) Should the permittee observe no violations of this regulation during this period then:
      i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
      ii) If a violation is noted, monitoring reverts to weekly.
      iii) Should no violation of this regulation be observed during this period then:
          A. The permittee may observe once per month.
          B. If a violation is noted, monitoring reverts to weekly.

3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachments B, C and D (or equivalents), noting:

1) Whether any air emissions (except for water vapor) were visible from the emission units;
2) All emission units from which visible emissions occurred;
3) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
4) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.
IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

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

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

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

10 CSR 10-6.060 Construction Permits Required
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. No event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information
1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.
10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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

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

Emission Limitation:

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive 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:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule. Issuance of a renewal operating permit does not restart the schedule:

1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.

2) Should no violation of this regulation be observed during this period then-
   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
c) Should no violation of this regulation be observed during this period then-
   i) The permittee may observe once per month.
   ii) If a violation is noted, monitoring reverts to weekly.

3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**
The permittee shall document all readings on Attachment A, or its equivalent, noting the following:
1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether equipment malfunctions contributed to an exceedance.
3) Any violations and any corrective actions undertaken to correct the violation.

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**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

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

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

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

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

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

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;

iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

**40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)**

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

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

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

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

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

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

10 CSR 10-6.065(6)(C)1.B Permit Duration
10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources’ personnel upon request.

2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

10 CSR 10-6.065(6)(C)1.G General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.
10 CSR 10-6.065(6)(C)1.1 Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065(6)(C)3 Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

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

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

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
a) The applicable requirements are included and specifically identified in this permit, or
b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7 shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.
1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, the permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
   b) The permit shield shall not apply to these changes.

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

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
   b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
   d) The permit shield shall not apply to these changes.

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

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

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause
This permit shall be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis
This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.
### Attachment A
Fugitive Emission Observations

<table>
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<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>Abnormal Emissions</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
<td>Beyond Boundary</td>
<td>Cause</td>
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## Attachment B

Visible Emission Observations

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<th>Emission Source</th>
<th>Visible Emissions</th>
<th>Excess Emissions</th>
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<th>Corrective Action</th>
<th>Initial</th>
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1If there are visible emissions, the permittee shall complete the excess emissions columns.
# Attachment C

## Method 9 Opacity Emissions Observations

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<th>Company</th>
<th>Observer</th>
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<td>Location</td>
<td>Observer Certification Date</td>
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<td>Date</td>
<td>Emission Unit</td>
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<td>Time</td>
<td>Control Device</td>
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<th>Steam Plume (check if applicable)</th>
<th>Attach</th>
<th>Detach</th>
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### SUMMARY OF AVERAGE OPACITY

<table>
<thead>
<tr>
<th>Set Number</th>
<th>Time</th>
<th>Opacity</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Start</td>
<td>End</td>
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</tbody>
</table>

Readings ranged from ________ to ________ % opacity.

Was the emission unit in compliance at the time of evaluation?  

**YES**  **NO**  Signature of Observer
### Attachment D

Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # ________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction</th>
<th>Impact</th>
<th>Duration</th>
<th>Cause</th>
<th>Action</th>
<th>Initials</th>
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<tbody>
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</table>
### Attachment E
VOC Compliance Worksheet

This sheet covers the period from __________ to __________ (month, year).

<table>
<thead>
<tr>
<th>Name of VOC containing Material Used</th>
<th>Monthly Quantity of Material Used (include units)</th>
<th>Density of Material (lb/gal)</th>
<th>VOC content of the Material (wt%)</th>
<th>Monthly VOC Emissions (tons)</th>
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<tbody>
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</tbody>
</table>

**Monthly Mass Balance VOC Emissions** (tons):

1. Report all material usage associated with any VOC emitting emission unit not that does not combust natural gas.
2. As obtained from the SDS for the Material. If the Specific Gravity (sg) of the Material is listed instead of the Density of the Material, Density of the Material (lb/gal) = Specific Gravity of the Material x 8.33 lb/gal.
3. As obtained from the SDS for the Material. If the SDS contains a range, use the highest value. If the VOC Content of Material (wt%) = VOC Content of Material (lb/gal) / Density of Material (lb/gal).
4. Monthly VOC Emissions (tons) = Monthly Quantity of Material Used (tons) x VOC Content of the Material (wt%) or Monthly VOC Emissions (tons) = Monthly Quantity of Material Used (lbs) x VOC Content of the Material (wt%) x 0.0005 ton/lb or Monthly VOC Emissions (tons) = Monthly Quantity of Material Used (gal) x Density of the Material (lb/gal) x VOC Content of the Material (wt%) x 0.0005 ton/lb.
 Brunswick Freshwater Group - Lebanon Missouri Facility  
Installation ID: 105-0006  
Part 70 Operating Permit  
Project No. 2017-09-007

### Monthly Quantity of Natural Gas Combusted (MMscf)

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>VOC Emission Factor (lb/MMscf)</th>
<th>Emission Factor Source</th>
<th>Monthly VOC Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU0130</td>
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<td>EU0140</td>
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<td>EU0150</td>
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<tr>
<td>EU0160</td>
<td>5.5</td>
<td>AP-42 Section 1.4</td>
<td></td>
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<tr>
<td>EU0170</td>
<td></td>
<td>&quot;Natural Gas Combustion&quot; (July 1998) Table 1.4-2</td>
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<tr>
<td>EU0220</td>
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<tr>
<td>EU0230</td>
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<td></td>
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<tr>
<td>EU0250</td>
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</table>

**Monthly Natural Gas Combustion VOC Emissions (tons):**

**Monthly SSM VOC Emissions from the Installation (tons):**

**Monthly VOC Emissions from the Installation (tons):**

**12-Month Rolling Total VOC Emissions from the Installation (tons):**

---

6Report all natural gas combusted by EU0130, EU0140, EU0150, EU0160, EU0170, EU0220, EU0230, and EU0250

7Monthly VOC Emissions (tons) = Monthly Quantity of Natural Gas Combusted (MMscf) x VOC Emission Factor (lb/MMscf) x 0.0005 ton/lb.

8Monthly Natural Gas Combustion VOC Emissions (tons) = the sum of Monthly VOC Emissions (tons) from each natural gas combustion emission source.

9As reported to the Air Pollution Control Program's Compliance/Enforcement Section in accordance with the requirements of 10 CSR 10-6.050 Start-Up, Shutdown, and Malfunction Conditions.


1112-Month Rolling Total VOC Emissions from the Installation (tons) = the sum of the 12 most recent Monthly VOC Emissions from the installation (tons). 12-Month Rolling Total VOC Emissions from the Installation of less than 235.0 tons indicates compliance.
Attachment F
Pressure Drop Records

This recordkeeping sheet or an equivalent form may be used to record pressure drops for control devices.

<table>
<thead>
<tr>
<th>Control Device ID</th>
<th>Week Beginning (Month/Day/Year)</th>
<th>Week Ending (Month/Day/Year)</th>
<th>Pressure Drop (inches water)</th>
<th>Within Specifications? (Yes/No)</th>
</tr>
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<tbody>
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STATEMENT OF BASIS

INSTALLATION DESCRIPTION
Brunswick Freshwater Group operates an aluminum boat manufacturing plant in Lebanon, Missouri. The major operations at the installation are metal fabrication, woodworking, surface coating, adhesive application, drying ovens, and general assembly and storage of finished units. This source is considered a major source for volatile organic compounds and hazardous air pollutants. It is also subject to MACT regulation 40 CFR Part 63, Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

Updated Potential to Emit for the Installation
Potential to emit was taken from Construction Permits 082015-010 and 082015-010A. Existing Potential Emissions used to calculate the PTE was taken from Construction Permit 072010-008. Emissions factors for natural gas combustion came from AP-42, Chapter 1.4, Natural Gas Combustion, July 2008. All units listed in Section I. Installation Equipment Listing are included in the PTE. Construction Permit 082015-010A limits VOCs 235.0 tpy.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>7.46</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>4.39</td>
</tr>
<tr>
<td>Sulfur Oxides (SOx)</td>
<td>0.012</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>1.53</td>
</tr>
<tr>
<td>Volatile Organic Compounds</td>
<td>&lt;235.0</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>1.29</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAP's)</td>
<td>19.16</td>
</tr>
<tr>
<td>Xylenes (CAS no. 1330207)</td>
<td>14.22</td>
</tr>
</tbody>
</table>

Reported Air Pollutant Emissions, tons per year

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<tr>
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</thead>
<tbody>
<tr>
<td>Particulate Matter $\leq$ Ten Microns (PM$_{10}$)</td>
<td>0.94</td>
<td>0.99</td>
<td>1.39</td>
<td>1.47</td>
<td>0.75</td>
</tr>
<tr>
<td>Particulate Matter $\leq$ 2.5 Microns (PM$_{2.5}$)</td>
<td>0.92</td>
<td>0.98</td>
<td>1.38</td>
<td>1.46</td>
<td>0.72</td>
</tr>
<tr>
<td>Sulfur Oxides (SO$_x$)</td>
<td>0.0046</td>
<td>0.0022</td>
<td>0.0059</td>
<td>0.0058</td>
<td>0.0044</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO$_x$)</td>
<td>0.75</td>
<td>0.36</td>
<td>0.98</td>
<td>0.96</td>
<td>0.73</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>71.81</td>
<td>61.23</td>
<td>60.58</td>
<td>60.99</td>
<td>53.82</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>0.63</td>
<td>0.30</td>
<td>0.82</td>
<td>0.81</td>
<td>0.61</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>3.74</td>
<td>3.34</td>
<td>2.87</td>
<td>2.88</td>
<td>2.63</td>
</tr>
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</table>
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 September 5, 2017;
2) 2016 Emissions Inventory Questionnaire, received April 20, 2017; and
4) WebFIRE; and
5) All of the documents listed in Construction Permit History section.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-3.090, Restriction of Emission of Odors
This rule was cited in Special Condition #1 of Construction Permit 1097-005. The rule was rescinded November 30, 2010, therefore it has not been applied in this permit. 10 CSR 10-6.165, Restriction of Emission Odors replaced this rule and is applied in Core Permit Requirements section.

10 CSR 10-6.250, Asbestos Projects – Certification, Accreditation, and Business Exemption Requirements
This rule is not applicable because the installation does not perform the regulated activities.

Construction Permit History
The following construction permits have been issued to this installation:

Construction Permit 1097-005, issued October 6, 1997
Construction Permit 1097-005A, issued April 30, 2001
This permit was issued for the following equipment:
EU0010 – Plywood Cutting
EU0020 – Paint Room #1- Primer Booth
EU0030 – Paint Room #1- Top Coat Booth
EU0070 – Solvent Usage
EU0090 – Carpet Gluing 12
EU0100 – Carpet Gluing 12A
EU0110 – Carpet Gluing 12B
EP19 – Welding
EP20 – Plasma Cutters
• This is a retro-active permitting action for equipment that was constructed or commenced operation after May 13, 1982.
• Amended to relocate portions of carpet gluing within the facility operations and to recalculate plant PTE.
• It is assumed special conditions 2, 4, 5, and 6 are superseded by Construction Permit 042005-008 because they are restated in this permit.
• Special Condition 1 does not appear in the permit because 10 CSR 10-3.090, Restriction of Emission of Odors was rescinded November 30, 2010. This rule was replaced with 10 CSR 6.165, Restriction of Emission Odors which appears in the Core Permit Requirements section.

No Permit Required Letter #2001-05-072, issued June 11, 2001
This determination is for the following equipment:
EP20 – Plasma Cutting
• Installation of a plasma cutter for aluminum was determined not to require a permit because the expected hourly emissions of particulate matter emissions were calculated to be 0.136 lbs, less than the 0.5 lbs/hr threshold for a construction permit.

Construction Permit 092002-011, issued September 17, 2002
This permit was issued for the following equipment:
EU0040 – Paint Room #2- Primer Booth
EU0050 – Paint Room #3 Topcoat Booth
EU0060 – Paint Room #2 Multi-Purpose Booth
EU0090 – Carpet Gluing 12
EU0100 – Carpet Gluing 12A
EU0110 – Carpet Gluing 12B
• Permit to install two (2) new paint booths and relocate the existing carpet gluing operations to different areas within the manufacturing plant.
• All special conditions superseded by Construction Permit 042005-008.

No Permit Required Letter #2003-10-001, issued October 15, 2003
EU0130 – Paint Room Drying Ovens
EP-20 – Plasma Cutting
• Installation of a liquefied petroleum gas fired drying oven and a plasma cutter was determined to have no significant emissions from the equipment, therefore no construction permit was required.

Construction Permit 022004-002, issued February 9, 2004
EU0080 – Other Cleaning Solutions
Three Wash Booths
• Permit to construct and add a new wash booth to their existing two wash booths.
• All special conditions superseded by Construction Permit 042005-008.

No Permit Required Letter #2004-02-092, issued March 4, 2004
• Relocation of paint booth #4 was determined not to involve any appreciable change in either the quality or nature of the ambient air, therefore no construction permit was required.
No Permit Required Letter #2004-09-003, issued September 27, 2004
- Relocation of one of the glue operations within the plant was determined not to involve any appreciable change either in the quality or nature of the ambient air, therefore no construction permit was required.

No Permit Required Letter #2004-10-037, issued December 6, 2004
- Installation of non-skid application process emissions was determined to below the exemption level, therefore no construction permit was required.

Construction Permit 042005-008, issued April 8, 2005
EU0060 – Paint Room #2 Multi-Purpose Booth
- Permit to construct and add pneumatic paint equipment to an existing paint booth.
- Special conditions supersede all special conditions found in Construction Permits 092002-011 and 022004-002.
- Special condition 1 assumed to be superseded by Special Condition 2 from Construction Permit 082015-010A because it is a more stringent limit on VOC.
- Special Condition 4 requires use of a panel filter control device when the paint booths are in operation.

Construction Permit 072010-008, issued July 22, 2010
Construction Permit 072010-008A, issued October 6, 2011
Construction Permit 072010-008B, issued December 20, 2017
EU0180 – Paint Room #2 Spray Booth
EU0190 – Paint Room #2 Spray Booth Camo
EU0200 – Paint Room #3 Spray Booth Primer
EU0210 – Paint Room #3 Multi-Purpose Booth
- Permit to construct four additional paint booths.
- Special conditions in this permit supersede Special Condition 1 found in Construction Permit 092002-011
- Amended to include the HAPs diphenylmethane-4,4 diisocyanate, CAS 101-68-8 (MDI) isomer emissions that were not originally included in the potential to emit calculations.
- Amended to allow the use of four spray guns in each paint booth at a time as camo painting requires a layering process that uses up to four spray guns at a time. It was determined that there would be no increase to the amount of potential paint usages so there is no increase in the potential emissions of the application.

Construction Permit 082015-010, issued August 18, 2015
New Source Review Permit Amendment 082015-010A, issued June 19, 2017
EU0220 – Burn Off Oven Paint Hooks
EU0230 – Powder Coating System Dry Off/Curing Oven and Water Heater (natural gas)
EU0240 – Powder Coat Paint Booth
EU0250 – Space Heating (natural gas)
- Original application to install a burn off oven for to remove excess paint on paint hooks.
- Application to construct a powder coating system, which includes a 3-stage wash system and water heater, a curing/drying oven, and a powder coat paint booth, that was deemed no construction permit required.
The material used in the 3-stage wash system contains no VOCs or HAPs, plus the pre-treatment wash is not spray applied so no particulate emissions are expected. The curing/drying oven is designed to combust a maximum of 1.6 MMBtus of natural gas per hour and emissions are expected to be below permitting thresholds. The powder coat paint booth is bottlenecked by the curing rate of the powder coat, and expected emissions are below permitting threshold with conservative estimates.

- Special Condition 1 supersedes Special Condition 2 found in Construction Permit 072010-008.
- Special Condition 2 corrects the VOC limitation applied to the facility in Construction Permit 072010-008. The condition limits VOC emissions to 235.0 tpy to provide allowances for the future installation of smaller VOC sources without the need to revise the synthetic minor VOC limit.

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

40 CFR Part 60, Subpart E *Standards of Performance for Incinerators*
The burn off ovens are designed to remove excess paint from left on painting hooks from various paint lines. This rule applies to incinerators that burn solid waste such as paper, wood, yard wastes, etc. These ovens do not burn solid waste as defined by this subpart; therefore this rule does not apply.

40 CFR Part 60, Subpart CCCC *Emission Guidelines and Compliance Times for Industrial Solid Waste Incineration Units that Commenced Construction On or Before November 30, 1999*
The rule applies to commercial and industrial solid waste incineration (CISWI) units that commenced construction after June 4, 2010, or commenced reconstruction or modification after August 7, 2013. CISWI units combust any solid wastes including garbage, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility. The incinerators at this facility do not meet the definition of a CISWI unit, and therefore this rule does not apply.

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

40 CFR Part 63, Subpart VVVV *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*
This rule does apply to this installation because the installation manufactures aluminum boats and is considered a major source of HAPs as defined in this subpart. This rule is applied in this permit in Permit Condition 005.

40 CFR Part 63, Subpart T *National Emission Standards for Halogenated Solvent Cleaning*
This rule applies to each individual batch vapor, in-line vapor, inline cold, and batch cold solvent cleaning machine that uses any solvent containing any combination of specific halogenated HAP solvents. The cleaning solvents located at this installation are all spray applied, which is not covered under the provision of this subpart per §63.460(a)

40 CFR Part 63, Subpart II *National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair Operations*
This rule applies to shipbuilding and ship repair operations at facilities that are major sources. Shipbuilding and ship repair operations mean any building, repair, repainting, converting, or alteration of ships. This facility does not meet the definition of shipbuilding and ship repair and therefore this rule does not apply.
40 CFR Part 63, Subpart MMMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
This rule is not applicable to this installation because according to §63.3881(c)(15), this subpart does not apply to the surface coating of boats or metal parts of boats (including, but not limited to, the use of assembly adhesives) where the facility meets the applicability criteria for Subpart VVVVV of Part 63.

This rule does not apply to hot water heaters below 120 US gallon capacity or with a heat input capacity of less than 1.6 MMBtu. EU0230, Powder Coating System Water Heater (natural gas), has a heat input capacity of 1.2 MMBtu, and therefore is not subject to this rule per §63.7491(d). This rule does not apply to EU0250, Space Heating, as space heaters do not meet the definition of process heaters per §63.7575.

This rule applies to area sources engaged in specific metal fabrication and finishing categories. This facility is not an area source and therefore this rule does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

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.

The entire installation has the potential to emit VOC and HAP above major source thresholds; however, no control devices (as defined by 40 CFR §64.1) are used to comply with any applicable VOC or HAP emission standards. Therefore, the installation is not required to submit a CAM plan under Part 64 at the time of Title V permit issuance.
Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. 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 10-6.220, Restriction of Emission of Visible Air Contaminants
- Paint Room #1 – Drying Oven, EU0130
- Paint Room #3 – Paint Booth Drying Oven, EU0140
- Paint Room #2 – Drying Oven, EU0150
- Paint Room #3 – Wash Booth Drying Oven, EU0160
- Drying Oven, EU0170
- Burn Off Oven Paint Hooks, EU0220
- Powder Coating System Dry Off/Curing Oven and Water Heater, EU0230
- Space Heating, EU0250
  
  These emission units meet exemption (1)(L) as they only burn natural gas.

- Welding, EP-19
  This unit meets exemption (1)(O) as the unit is contained within and emits only within the building space. The unit does not vent to outside the building space.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
- Paint Room #1 – Drying Oven, EU0130
- Paint Room #3 – Paint Booth Drying Oven, EU0140
- Paint Room #2 – Drying Oven, EU0150
- Paint Room #3 – Wash Booth Drying Oven, EU0160
- Drying Oven, EU0170
- Burn Off Oven Paint Hooks, EU0220
- Powder Coating System Dry Off/Curing Oven and Water Heater, EU0230
- Space Heating, EU0250
  This regulation does not apply to the above list of emission units because they all combust pipeline natural gas, which is exempt per (1)(A)2.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions
- Paint Room #1 – Drying Oven, EU0130
- Paint Room #3 – Paint Booth Drying Oven, EU0140
- Paint Room #2 – Drying Oven, EU0150
- Paint Room #3 – Wash Booth Drying Oven, EU0160
- Drying Oven, EU0170
- Burn Off Oven Paint Hooks, EU0220
- Powder Coating System Dry Off/Curing Oven and Water Heater, EU0230
- Space Heating, EU0250
These emission units only combust natural gas and are except from this rule per (1)(A), an individual unit fueled exclusively with natural gas or liquefied petroleum gas is exempt from this rule.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

- Paint Room #1- Primer Booth, EU0020
- Paint Room #1- Top Coat Booth, EU0030
- Paint Room #2- Primer Booth, EU0040
- Paint Room #3 Top Coat Booth, EU0050
- Paint Room #2 Multi-Purpose Booth, EU0060
- Paint Room #2-Spray Booth, EU0180
- Paint Room #2-Spray Booth Camo, EU0190
- Paint Room #3-Spray Booth Primer, EU0200
- Paint Room #3-Multi-Purpose Booth, EU0210

These coating units are all equipped with a control system designed to control at least 95% of the particulate overspray and meet exemption (1)(8)14. Permit Conditions 001 and 002 contain federally enforceable requirements to operate control devices on the coating units listed above to meet the exemption.

- Plywood Cutting, EU0010
- Carpet Gluing 12, EU0090
- Carpet Gluing 12A, EU0100
- Carpet Gluing 12B, EU0110
- Burn-off Oven, EU0220

According to (1)(B)15., any unit subject to a federally enforceable requirement to install, operate, and maintain a particulate matter control device system that controls at least 90% of particulate matter emissions is exempt from this rule. Permit Conditions 001, 002, and 003 all contain federally enforceable requirements to operate a control device on the emission sources listed above. By following these conditions, the emission units will be exempt from this regulation.

- Paint Room #1 – Drying Oven, EU0130
- Paint Room #3 – Paint Booth Drying Oven, EU0140
- Paint Room #2 – Drying Oven, EU0150
- Paint Room #3 – Wash Booth Drying Oven, EU0160
- Drying Oven, EU0170
- Powder Coating System Dry Off/Curing Oven, EU0230
- Space Heating, EU0250

These units are exempt from this rule per (1)(B)12. in which emission units that at maximum design capacity have a potential to emit less than half (0.5) pounds per hour of particulate matter are exempt. All units burn natural gas and do not have equipment installed to control particulate matter. The calculations use the total heat capacity of all space heaters at the facility. The drying ovens, water heater, and curing oven all have smaller individual heat capacities than all space heaters combined, and therefore are also expected to meet the exemption. The calculations below verify that this emission unit has a potential to emit less than 0.5 pounds per hour of particulate matter.

Total heat capacity of space heaters = 24.9 MMBtu/hr

Emission factor for PM = 7.6 lb/E^6 scf (AP-42 Chapter 1.4 Table 2, PM (Total))
\[ 7.6 \frac{lb}{E_6scf} \times \frac{E_6scf}{1020 MMBtu} \times 24.9 \frac{MMBtu}{hr} = 0.185 \frac{lb}{hr} \]

- **Welding, EP-19**
  This unit is exempt from this rule per (1)(B)12. in which emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The calculations below verify that this emission unit has a potential to emit less than 0.5 pounds per hour of particulate matter.

  Average weight of welding wire used for a boat = 2.3 lb
  Most conservative estimated time to weld a boat = 45 min (0.75 hr)
  Emission factor for PM\(_{10}\) = 2.5 lb/E\(^3\)lb (AP-42 Chapter 12.19 Table 1, GMAW E70S welding)

  
  
  \[
  \frac{2.3 lb}{0.75 hr} \times \frac{E^3lb}{1000 lb} \times 5.2 \frac{lb}{E^3lb} = 0.0159 \frac{lb}{hr}
  \]

- **Plasma Cutters, EP-20**
  This unit is exempt from this rule per (1)(B)12. in which emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The calculations below verify that this emission unit has a potential to emit less than 0.5 pounds per hour of particulate matter.

  Maximum hourly design rate = 0.004 ton/hour
  Mass balance emission factor for PM\(_{10}\) = 40 lb/ton
  Assume 100% emissions for most conservative calculations, no deduction for multiple layer screen control device:

  \[
  1 \frac{ton}{hour} \times 0.1 \frac{lb}{ton} = 0.1 \frac{lb}{hour}
  \]

- **Powder Coat Paint Booth, EU0240**
  This unit is exempt from this rule per (1)(B)12. in which emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The calculations below verify that this emission unit has a potential to emit less than 0.5 pounds per hour of particulate matter.

  Number of rails painted in 24 hours = 15 rails
  Amount of powder coat needed to cover a rail = 3 lb
  Transfer efficiency = 93%
  
  \[
  15 \frac{rail}{day} \times \frac{day}{24 hours} \times 3 \frac{lb}{rail} \times (1 - 0.93) = 0.131 \frac{lb}{hr}
  \]

10 CSR 10-6.405, Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating
The installation is exempt from this rule per (1)(E) as all applicable units are fueled only by natural gas.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:
1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).
Response to Public Comments

On January 9, 2018, the Air Pollution Control Program received comments from Gayle Lee, Chemical Engineer, Midwest Environmental Consultants.

Comment 1: the construction permit amendment has been approved under AP201709006. Is there any way this amendment can get incorporated into the draft?

Response to Comment: Construction Permit Amendment 072010-008B was incorporated into Permit Condition 002. The amendment allowed for the operation of four spray nozzles at one time, and the Special Conditions found in the amendment were added to the permit condition.

The rest of the comments were typographical errors that were all corrected.
Mr. Dave Hagen  
Brunswick Freshwater Group - Lebanon Missouri Facility  
2900 Industrial Drive  
Lebanon, MO 65536  

Re: Brunswick Freshwater Group - Lebanon Missouri Facility, 105-0006  
Permit Number: OP2018-026

Dear Mr. Hagen:

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:jsj

Enclosures

c: PAMS File: 2017-09-007