



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: OP2011-034
Expiration Date: JUL 17 2016
Installation ID: 173-0037
Project Number: 2007-05-141

Installation Name and Address

Buckhorn Rubber Products, Inc.
5151 Industrial Drive
Hannibal, MO 63401
Ralls County

Parent Company's Name and Address

ZhongDing Sealing Parts (USA)
P.O. Box 168
Strasburg, OH 44680

Installation Description:

Buckhorn Rubber Products manufactures rubber replacement and original equipment parts at their Hannibal, Missouri plant to meet the specialized needs of the transportation, agricultural and civil construction industries. Injection molded rubber parts include: flexible air intake hose, vibration isolators, rubber latches, rubber boots, bellows, and specialized rubber-to-metal bonding. The installation is an existing major source of volatile organic compounds (VOC).

JUL 18 2011

Effective Date


Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Buckhorn Rubber Products manufactures rubber replacement and original equipment parts at their Hannibal, Missouri plant to meet the specialized needs of the transportation, agricultural and civil construction industries. Injection molded rubber parts include: flexible air intake hose, vibration isolators, rubber latches, rubber boots, bellows, and specialized rubber-to-metal bonding. The installation is an existing major source of volatile organic compounds (VOC)

In addition to the molding machines, there is a paint dip tank line and curing oven, a chain-on-edge paint line with two (2) ovens, seven (7) sandblasting units, adhesive spray booths and a mixer operated at the installation. The mixer combines raw materials to produce the rubber used for molding. The mixer is controlled by a baghouse. The largest sandblaster is an automatic process and is also controlled by a fabric filter.

The reported actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year					
Pollutants	2009	2008	2007	2006	2005
Particulate Matter ≤ Ten Microns (PM ₁₀)	5.59	9.55	9.02	11.30	9.10
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	5.50	9.46	8.90	11.19	8.93
Sulfur Oxides (SO _x)	0.00	0.00	0.00	0.00	0.01
Nitrogen Oxides (NO _x)	0.00	0.00	0.50	0.92	0.90
Volatile Organic Compounds (VOC)	4.32	8.69	11.33	10.16	13.33
Carbon Monoxide (CO)	0.00	0.00	0.00	0.77	0.76
Lead (Pb)	0.03	0.04	1.90	0.06	0.06
Hazardous Air Pollutants (HAPs)	0.83	1.35	0.61	0.11	0.55
Ammonia (NH ₃)	0.00	0.00	0.00	0.03	0.03

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	EQ Reference #	Description of Emission Unit	Make/Model-Serial No.	Construction Date
EU0010	EP-01	Banbury Mixer	Skiner Engine CO/11D	2005
EU0020	EP-07	Mold and Casting Blast Room	Not Available	1998
EU0030	EP-10	Adhesive Spray Booth	Devilbiss	1998
EU0040	EP-18	Rutil #14 Injection Molding Machine	Rutil/127-300	1994
EU0050	EP-18	Rutil #15 Injection Molding Machine	Rutil/77-736	1992
EU0060	EP-18	Rutil #16 Injection Molding Machine	Rutil/127-301	1994
EU0070	EP-18	Rutil #17 Injection Molding Machine	Rutil/127-302	1995
EU0080	EP-18	Rutil #18 Injection Molding Machine	Rutil/139-250	1996
EU0090	EP-18	Rutil #19 Injection Molding Machine	Rutil/127-304	1996
EU0100	EP-18	Rutil #20 Injection Molding Machine	Rutil/127-305	1996
EU0110	EP-18	Rutil #27 Injection Molding Machine	Rutil/131 0204	1995
EU0120	EP-18	Rutil #28 Injection Molding Machine	Rutil/131-212	1995
EU0130	EP-18	Rutil #29 Injection Molding Machine	Rutil/131-216	1996
EU0170	EP-35	Pneumatic Transfer System #1	Not Available	2003
EU0180	EP-35	Pneumatic Transfer System #2	Not Available	2003
EU0190	EP-35	Pneumatic Transfer System #3	Not Available	2003
EU0220	EP-35	Plastic Grinder	Nelmor/26078	2002
EU0230	EP-15	Paint Dip Tank Line	Industrial Finishing	2002
EU0240	EP-19	Abrasive Blast Line	Viking	1996

EMISSION UNITS WITHOUT LIMITATIONS

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

EQ Reference #	Description of Emission Unit
EP-02	Large RES 1500HT Storage Tanks
EP-03	Small SUNDEX8125 Storage Tanks
EP-08 & EP-23	Metal-prep Blasters (Sand)
EP-24	Metal-prep Blasters (Steel Shot)
EP-27	Grinder
EP-09	Degreaser MP
EP-11	Mold Pre-Heat Oven
EP-12	Roof Exhaust Fans
EP-13	Small mold blaster (Plastic bead)
EP-14	Four (4)- Space heaters (Main Building)
EP-17	Three (3)- Space Heaters (North Building)
EP-20	Maintenance Blaster (Sand)

EIQ

Reference #	Description of Emission Unit
EP-22	Automated Blast Line (Parts Washer)
EP-26	Extruder
EP-29	Compression Mill
EP-30	Space Heater (Mix plant)
EP-31	Maintenance parts washer
EP-25	Cryogenic Deflasher
EP-16 & EP-21	Dip Tank Ovens
EP-33	Chain-on Edge Paint Booth #2 (EU0150)
EP-34	Chain-on Edge Paint Oven (EU0160)
	Part Tumbler
	Infrared Light Ovens
	Splice Presses (4)
	Buffing Hood
	Battery Chargers
	Lab Presses
	Lab Mixer
	Lab Mill
	Machining Equipment

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.

None

III. Emission Unit Specific Emission Limitations

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

EU0010 – Banbury Mixer			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0010	Banbury Mixer - Mixing, blending, grinding of raw materials (1979). This unit includes a baghouse with ninety percent (90%) control efficiency and seventy percent (70%) capture efficiency.	Skinner Engine Co./ 11D	EP-01

<p style="text-align: center;">Permit Condition EU0010-001</p> <p style="text-align: center;">10 CSR 10-6.400 — Restriction of Emission of Particulate Matter from Industrial Processes 40 CFR Part 64 — Compliance Assurance Monitoring (CAM)</p>

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 8.56 lbs/hr from the Banbury Mixer (EU0010).
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring:

- 1) The permittee is subject to the CAM plan contained in Attachment A.
- 2) *CAM Compliance Indicators:* The following CAM Indicators shall be used to monitor the control device (baghouse):
 - a) Visible Emissions
 - i) Visible emissions from the baghouse stack exhaust shall be monitored using EPA Reference Method 22-like procedures on a daily basis to ensure no visible emissions during the operation of this unit. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow.
 - b) Pressure Drop
 - i) The permittee shall check and document the baghouse pressure drop daily. The pressure drop across the baghouse shall be maintained within the range of 1.0 to 8.0 inches of water (H₂O).
- 3) *CAM Compliance Indicator Range:* An excursion is defined as either the presence of visible emissions or as a pressure drop less than 1.0 in H₂O or a pressure drop greater than 8.0 in H₂O. A pressure drop outside of the normal operating range. An excursion of either indicator constitutes an excursion. If visible emissions are present when the pressure drop is within its specified indicator range and no baghouse problems are identified as the cause, the pressure drop indicator range shall be re-evaluated by Buckhorn Rubber Products. Excursions trigger an inspection, corrective action, and need to be reported in the next Semi-annual Monitoring Report; if an excursion results in excess emissions exceeding one hour, Buckhorn Rubber Products may elect to file a start-up, shutdown, and malfunction assertion under 10 CSR 10-6.050 if appropriate to the situation.

- 4) *Proper maintenance*: At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [§64.7(b)]
- 5) *Continued operation*: Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall collect data at all required intervals when the emission unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of Part 64. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§64.7(c)]
- 6) *Response to exceedances*: [§64.7(d)]
 - a) Upon detecting an exceedance, the permittee shall restore operation of the emission unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an exceedance (other than those caused by excused start-up or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [§64.7(d)(1)]
 - b) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [§64.7(d)(2)]

Recordkeeping:

- 1) *General Recordkeeping Requirements*:
 - a) The permittee shall comply with the recordkeeping requirements specified in §70.6(a)(3)(ii). The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [§64.9(b)(1)]
 - b) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [§64.9(b)(2)]
- 2) All records shall be maintained for five years.
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) *General Reporting Requirements*: The permittee shall submit semi-annual monitoring certified by a responsible official using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III). The report shall include, at a minimum, the following information, as applicable: [§64.9(a)(1) & (2)]
 - a) All instances of deviations from permit requirements must be clearly identified;

- b) Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken;
 - c) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [§64.9(a)(2)(i)]
 - d) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [§64.9(a)(2)(ii)]
 - e) A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [§64.9(a)(2)(iii)].
- 2) *Documentation of need for improved monitoring*: If the permittee identifies a failure to achieve compliance with this permit condition for which the approved monitoring did not provide an indication of an exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Air Pollution Control Program and, if necessary, submit a proposed modification to the part 70 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [§64.7(e)]
- 3) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any deviations/exceedance of the Emission Limitation.

Permit Condition EU0010-002

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

Emission Limitation:

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any new source of emission, not exempted under this rule, any visible emissions with an opacity greater than 20 percent. Note: *New source*: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting:

As detailed in Core Permit Requirements.

EU0020 – Abrasive Blasting			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0020	Abrasive Blasting Process (1998). This unit includes a dust collector with ninety-nine percent (99%) control efficiency and a hundred percent (100%) capture efficiency.	Not Available	EP-07

<p align="center">Permit Condition EU0020-001</p> <p>10 CSR 10-6.400 — Restriction of Emission of Particulate Matter from Industrial Processes</p>
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Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 5.01 lbs/hr from the abrasive blasting process (EU0020).
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Equipment and Operation Parameters:

The permittee shall calibrate, maintain and operate the instrumentation and baghouse according to the manufacturer's specifications and recommendations.

Monitoring:

The permittee shall meet the following baghouse operation and maintenance requirements when the source is in operation:

- 1) The baghouse shall be maintained such that the pressure drop remains in the normal operating range (1 inches of water to 8 inches of water), whenever the emission unit(s) is in operation.
- 2) All instruments and control equipment shall be calibrated, maintained and operated according to the manufacture specifications and recommendations.
- 3) Check and document the baghouse pressure drop weekly. If the pressure drop falls out of the normal operating range, corrective action shall be taken within eight hours to return the pressure drop to normal.
- 4) Check and document the cleaning sequence of the baghouse monthly.
- 5) Thoroughly inspect bags for leaks and wear quarterly.
- 6) Inspect every six months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.
- 7) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented within eight hours.

Recordkeeping:

- 1) The permittee shall maintain records of the monitoring of the pressure drop across the installed fabric filters of the baghouse for all instances when monitoring of the pressure drop is required.
- 2) The permittee shall maintain records of the inspections of the fabric filters when they occur. Records shall be kept indicating the date fabric filters are changed out and the on-hand inventory of the fabric filters.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) deviated from the normal operating pressure drop range.

- 2) Reports of any deviations from monitoring other than the pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition EU0020-002

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

Emission Limitation:

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any new source of emission, not exempted under this rule, any visible emissions with an opacity greater than 20 percent. Note: *New source*: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting:

As detailed in Core Permit Requirements.

EU0030 – Adhesive Spray Booth			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0030	Adhesive Spray Booth - Adhesive Mixing, Adhesive Application, Equipment Cleaning (1998). This unit includes dry panel filters.	Devilbiss	EP-10

Permit Condition EU0030-001

**10 CSR 10-6.075 — Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart M — National Emission Standards for Hazardous Air
Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
40 CFR Part 63, Subpart A — General Provisions**

The installation chooses to use the emission rate without add-on controls option [§63.3891(b)] to demonstrate compliance with the emission limits, and the testing and initial compliance requirements of this rule.

Emission Limitation:

- 1) For an existing affected source - You must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in §63.3890(b)(4), except as specified in §63.3890(c), determined according to the requirements in §63.3941, §63.3951, or §63.3961. [§63.3890(b)]
- a) For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 4.5 kg (37.7 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period. [§63.3890(b)(4)]
- 2) Emission rate without add-on controls option - Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for

the coating operation(s) is less than or equal to the applicable emission limit in §63.3890(b)(4), calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. [§63.3891(b)]

Compliance Demonstration:

- 1) Compliance Date for existing affected source:
 - a) The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in §63.3883(a) through (c). The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.3940, 63.3950 and 63.3960. [§63.3883]
 - i) Existing affected sources – The compliance date is the date three years after January 2, 2004. [§63.3883(b)]
- 2) Initial Compliance Demonstration:
 - a) You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890. [§63.3950]
 - b) You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). [§63.3951]
 - c) You must meet all the requirements of §63.3951. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. [§63.3951]
- 3) Continuous Compliance Demonstration:
 - a) The organic HAP emission rate for the initial compliance period calculated using Equation 3 of §63.3951 must be less than or equal to the applicable emission limit in §63.3890(b)(4). You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890(b)(4), determined according to the procedures in this section. [§63.3951(h)]

- b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890(b)(4), this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6). [§63.3952(b)]
- c) As part of each semi-annual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890(b)(4), determined according to §63.3951(a) through (g). [§63.3952(c)]
- d) You must maintain records as specified in §§63.3930 and 63.3931. [§63.3952(d)]

Compliance Test Methods and Calculations:

- 1) *Determine the mass fraction of organic HAP for each material used.* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a).. [§63.3951(a)]
 - a) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in §63.3941 (a)(1) through (5). [§63.3941(a)]
 - i) *Method 311 (Appendix A to 40 CFR Part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in §63.3941 (a)(1)(i) and (ii) when performing a Method 311 test. [§63.3941(a)(1)]
 - (1) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791). [§63.3941(a)(1)(i)]
 - (2) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763). [§63.3941(a)(1)(ii)]
 - ii) *Method 24 (Appendix A to 40 CFR Part 60).* For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in Appendix A to 40 CFR Part 63, Subpart PPPP, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in Appendix A to 40 CFR Part 63, Subpart PPPP, as a substitute for the mass fraction of organic HAP. [§63.3941(a)(2)]
 - iii) *Alternative method.* You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(a)(3)]
 - iv) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in §63.3941 (a)(1) through (3), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to

§63.3941 (a)(1) through (3), then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(4)]

- v) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to 40 CFR Part 63, Subpart MMMM. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4 to 40 CFR Part 63, Subpart MMMM, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(5)]
- 2) *Determine the volume fraction of coating solids for each coating.* Determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each month according to the requirements in §63.3941(b). [§63.3951(b)]
- a) *Determine the volume fraction of coating solids for each coating.* You must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in §63.3941 (b)(1) through (4). If test results obtained according to §63.3941 (b)(1) do not agree with the information obtained under §63.3941 (b)(3) or (4), the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(b)]
- i) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).* You may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see §63.14), or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.3941(b)(1)]
- ii) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(b)(2)]
- iii) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.3941(b)(3)]
- iv) *Calculation of volume fraction of coating solids.* You may determine the volume fraction of coating solids using Equation 1 of §63.3941: [§63.3941(b)(4)]

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

Where:

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

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

D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

- 3) *Determine the density of each coating.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965-02, "Standard Test Methods for Specific Gravity of Coating Powders" (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475-98 or ASTM Method D5965-02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of §63.3951. [§63.3951 (c)]
- 4) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of §63.3951. [§63.3951 (d)]
- 5) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of §63.3951. [§63.3951(e)]

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

H_e = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of §63.3951

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of §63.3951.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of §63.3951.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to §63.3951(e)(4). (You may assign a value of zero to R_w if you do not wish to use this allowance.)

- a) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of §63.3951:

$$A = \sum_{i=1}^m (\text{Vol}_{c,i})(D_{c,i})(W_{c,i}) \quad (\text{Eq. 1A})$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

Vol_{c,i} = Total volume of coating, i, used during the month, liters.

D_{c,i} = Density of coating, i, kg coating per liter coating.

W_{c,i} = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of Part 63.

m = Number of different coatings used during the month. [§63.3951(e)(1)]

- b) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of §63.3951:

$$B = \sum_{j=1}^n (\text{Vol}_{t,j})(D_{t,j})(W_{t,j}) \quad (\text{Eq. 1B})$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

Vol_{t,j} = Total volume of thinner and/or other additive, j, used during the month, liters.

D_{t,j} = Density of thinner and/or other additive, j, kg per liter.

W_{t,j} = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of part 63.

n = Number of different thinners and/or other additives used during the month. [§63.3951(e)(2)]

- c) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of §63.3951:

$$C = \sum_{k=1}^p (\text{Vol}_{s,k})(D_{s,k})(W_{s,k}) \quad (\text{Eq. 1C})$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

Vol_{s,k} = Total volume of cleaning material, k, used during the month, liters.

D_{s,k} = Density of cleaning material, k, kg per liter.

W_{s,k} = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month. [§63.3951(e)(3)]

- d) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of §63.3951, then you must determine the mass according to §63.3951 (e)(4)(i) through (iv). [§63.3951(e)(4)]
- i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of §63.3951 and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR Part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater. [§63.3951(e)(4)(i)]
- ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have

already included them in the amount collected and stored during that month or a previous month. [§63.3951(e)(4)(ii)]

- iii) Determine the total mass of organic HAP contained in the waste materials specified in §63.3951(e)(4)(ii). [§63.3951(e)(4)(iii)]
 - iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them. [§63.3951(e)(4)(iv)]
- 6) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of §63.3951:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad (\text{Eq. 2})$$

Where:

V_{st} = Total volume of coating solids used during the month, liters.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.

$V_{s,i}$ = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

m = Number of coatings used during the month. [§63.3951(f)]

- 7) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of §63.3951:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad (\text{Eq. 3})$$

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of §63.3951.

V_{st} = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of §63.3951.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12). [§63.3951(g)]

Monitoring:

You must always operate and maintain your affected source, according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]

Recordkeeping:

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard. [§63.3930]

- 1) A copy of each notification and report that you submitted to comply with 40 CFR Part 63, Subpart M, and the documentation supporting each notification and report. [§63.3930(a)]
- 2) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each

coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]

- 3) For each compliance period, the records specified in §63.3930(c)(3).
 - a) A record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951. [§63.3930(c)(3)]
- 4) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period shall be kept. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
- 5) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
- 6) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
- 7) The density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. [§63.3930(g)]
- 8) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in §63.3930(h)(1) through (3). [§63.3930(h)]
 - a) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which Subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.3930(h)(1)]
 - b) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951. [§63.3930(h)(2)]
 - c) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.3930(h)(3)]
- 9) You must keep records of the date, time, and duration of each deviation. [§63.3930(j)]
- 10) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
- 11) As specified in §63.10(b)(1), you must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
- 12) You must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining three years. [§63.3931(c)]

Reporting:

- 1) *General.* You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in §63.3910 (b) and (c). [§63.3910(a)]
- 2) *Notification of Compliance Status.* You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.3940 that applies to your affected source. The notification of compliance status must contain the information specified in §63.3910(c)(1) through (11) and in §63.9(h). [§63.3910(c)]
 - a) Company name and address. [§63.3910(c)(1)]
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3910(c)(2)]
 - c) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §§63.3950 that applies to your affected source. [§63.3910(c)(3)]
 - d) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation in the affected source during the initial compliance period. [§63.3910(c)(4)]
 - e) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period. [§63.3910(c)(5)]
 - f) If you had a deviation, include the information in §63.3910 (c)(6)(i) and (ii). [§63.3910(c)(6)]
 - i) A description and statement of the cause of the deviation. [§63.3910(c)(6)(i)]
 - ii) If you failed to meet the applicable emission limit in §63.3890, include all the calculations you used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports. [§63.3910(c)(1)(ii)]
 - g) For each of the data items listed in §63.3910 (c)(7)(i) through (iv) that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). You do not need to submit copies of any test reports. [§63.3910(c)(7)]
 - i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material. [§63.3910(c)(7)(i)]
 - ii) Volume fraction of coating solids for one coating. [§63.3910(c)(7)(ii)]
 - iii) Density for one coating, one thinner and/or other additive, and one leaning material, except that if you use the compliant material option, only the example coating density is required. [§63.3910(c)(7)(iii)]
 - iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.3951. [§63.3910(c)(7)(iv)]
 - h) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) you used, as specified in §63.3910 (c)(8)(ii). [§63.3910(c)(8)]
 - i) Provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.3951. [§63.3910(c)(8)(ii)]
- 3) *Semi-annual compliance reports.* You must submit semi-annual compliance reports for each affected source according to the requirements of §63.3920(a)(1) through (7). The semi-annual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in §63.3920(a)(2). [§63.3920(a)]

- a) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semi-annual compliance report according to the dates specified in §63.3920(a)(1)(i) through (iv). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(1)]
- i) The first semi-annual compliance report must cover the first semi-annual reporting period which begins the day after the end of the initial compliance period described in §63.3940 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period. [§63.3920(a)(1)(i)]
 - ii) Each subsequent semi-annual compliance report must cover the subsequent semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.3920(a)(1)(ii)]
 - iii) Each semi-annual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.3920(a)(1)(iii)]
 - iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in §63.3920 (a)(1)(iii). [§63.3920(a)(1)(iv)]
- b) *Inclusion with Title V Report.* Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 40 CFR Part 71 must report all deviations as defined in 40 CFR Part 63, Subpart MMMM in the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semi-annual compliance report along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semi-annual compliance report includes all required information concerning deviations from any emission limitation in 40 CFR Part 63, Subpart MMMM, its submission will be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a semi-annual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]
- c) *General Requirements.* The semi-annual compliance report must contain the information specified in §63.3920(a)(3)(i) through (v), and the information specified in §63.3920(a)(4) through (7) and (c)(1) that is applicable to your affected source. [§63.3920(a)(3)]
- i) Company name and address. [§63.3920(a)(3)(i)]
 - ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3920(a)(3)(ii)]
 - iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
 - iv) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used. [§63.3920(a)(3)(iv)]
 - v) If you used the emission rate without add-on controls compliance option (§63.3891(b)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. [§63.3920(a)(3)(v)]

- d) *No Deviations.* If there were no deviations from the emission limitations in §§63.3890, that apply to you, the semi-annual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- e) *Deviations:* Emission rate without add-on controls option. If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semi-annual compliance report must contain the information in §63.3920 (a)(6)(i) through (iii). [§63.3920(a)(6)]
 - i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890. [§63.3920(a)(6)(i)]
 - ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports). [§63.3920(a)(6)(ii)]
 - iii) A statement of the cause of each deviation. [§63.3920(a)(6)(iii)]

EU0040 through EU0130 – Rubber Injection Molding Machines			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0040	Rubber Injection Molding Machine (1994).	Rutil/ 127/300	EP-18
EU0040	Rutil #14 Rubber Injection Molding Machine (1992).		
EU0050	Rutil #15 Rubber Injection Molding Machine (1994).		
EU0060	Rutil #16 Rubber Injection Molding Machine (1995).		
EU0070	Rutil #17 Rubber Injection Molding Machine (1996).		
EU0080	Rutil #18 Rubber Injection Molding Machine (1996).		
EU0090	Rutil #19 Rubber Injection Molding Machine (1996).		
EU0100	Rutil #20 Rubber Injection Molding Machine (1996).		
EU0110	Rutil #27 Rubber Injection Molding Machine (1995).		
EU0120	Rutil #28 Rubber Injection Molding Machine (1995).		
EU0130	Rutil #29 Rubber Injection Molding Machine (1996).		

Permit Condition EU0040-001 through EU0130-001
10 CSR 10-6.060 — Construction Permits Required
Construction Permit No. 0997-043, Issued September 22, 1999

Emission Limitation:

The permittee shall not process more than one (1) ton of raw materials per hour through the rubber injection molding machines identified as emission units EU0040 through EU0130.

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of the hourly amount of raw materials processed through the rubber injection molding machines (EU0040 through EU0130). These records shall be kept on-site for the most recent sixty (60) month period of operation and be made immediately available to Department of Natural

Resources' personnel upon request. These records shall be on Attachment B, *Production Level Compliance Form*, or on any substantially conforming form containing the same information.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month, if the records indicate the source exceeded the raw materials limitation (1 ton of raw materials per hour).

EU0170 through EU0190 – Three (3) Pneumatic Transfer Systems EU0220 - Plastic Grinder			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0170 through EU0190	Pneumatic Transfer System #1, #2 and #3. The units include fabric filters with ninety-nine percent (99%) control efficiency and a hundred (100%) capture efficiency. (2003)	Not Available	EP-35
EU0220	Plastic Grinder - Grinds edgings and flashings from plastic parts. This unit includes fabric filter with ninety-nine percent (99%) control efficiency and a hundred (100%) capture efficiency. (2002)	Nelmor/26078	EP-35

<p align="center">Permit Condition EU0170-001 through EU0190-001 and EU0220-001 10 CSR 10-6.400 — Restriction of Emission Particulate Matter from Industrial Processes 10 CSR 10-6.060 — Construction Permits Required Construction Permit No. 052001-017, Issued May 9, 2001</p>

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 4.74 lbs/hour from each of the emission units EU0170 through EU0190 and EU0220.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.
Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

Equipment and Operation Parameters:

The permittee shall control emissions from the pneumatic transfer units (EU0170 through EU0210) using a panel filter. The panel filter shall be operated and maintained in accordance with the manufacturer's specifications.

Monitoring/Recordkeeping:

The permittee shall maintain an operating and maintenance log for the fabric filter, which shall include the following:

- 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
- 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

Reports of any deviations from this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0170-002 through EU0190-002 and EU0220-002
10 CSR 10-6.220 — Restriction of Emission of Visible Air Contaminants**

Emission Limitation:

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any new source of emission, not exempted under this rule, any visible emissions with an opacity greater than 20 percent. Note: *New source*: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting:

As detailed in Core Permit Requirements.

EU0230 – Paint Dip Tank			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0230	Paint Dip Tank - ConveyORIZED paint line that dips parts into tanks of primer and adhesive topcoat, then dries them in ovens.	Industrial Finishing	EP-15

**Permit Condition EU0230-001
10 CSR 10-6.065 Operating Permits
OP2002-060 Settlement Agreement**

Operation Parameters:

The permittee shall use water-based primer and adhesive per settlement agreement.

Monitoring/Recordkeeping:

The permittee shall keep records of coating/adhesive formulation data.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this permit condition. The reporting shall be in writing or orally with written notice to follow within ten days after the verbal report.

EU0240 – Abrasive Blast Line			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0240	Abrasive Blast Line (1996). This unit includes a fabric filter with ninety-nine percent (99%) control efficiency and a hundred (100%) capture efficiency.	Viking	EP-19

Permit Condition EU0240-001
10 CSR 10-6.400 — Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 5.30 lbs/hr from the abrasive blast line process (EU0240).
- 2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Equipment and Operation Parameters:

The permittee shall calibrate, maintain and operate the instrumentation and baghouse according to the manufacturer's specifications and recommendations.

Monitoring:

The permittee shall meet the following baghouse operation and maintenance requirements when the source is in operation:

- 1) The baghouse shall be maintained such that the pressure drop remains in the normal operating range (1 inch of water to 8 inches of water), whenever the emission unit(s) is in operation.
- 2) All instruments and control equipment shall be calibrated, maintained and operated according to the manufacture specifications and recommendations.
- 3) Check and document the baghouse pressure drop weekly. If the pressure drop falls out of the normal operating range, corrective action shall be taken within eight hours to return the pressure drop to normal.
- 4) Check and document the cleaning sequence of the baghouse monthly.
- 5) Thoroughly inspect bags for leaks and wear quarterly.
- 6) Inspect every six months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.
- 7) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented within eight hours.

Recordkeeping:

- 1) The permittee shall maintain records of the monitoring of the pressure drop across the installed fabric filters of the baghouse for all instances when monitoring of the pressure drop is required.
- 2) The permittee shall maintain records of the inspections of the fabric filters when they occur. Records shall be kept indicating the date fabric filters are changed out and the on-hand inventory of the fabric filters.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) deviated from the normal operating pressure drop range.
- 2) Reports of any deviations from monitoring other than the pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition EU0240-002

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

Emission Limitation:

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any new source of emission, not exempted under this rule, any visible emissions with an opacity greater than 20 percent.
Note: *New source*: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting:

As detailed in Core Permit Requirements.

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) 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 following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and
 - iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be

conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;

- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Buckhorn Rubber Products, Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Buckhorn Rubber Products, Inc. fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A-Test Methods, Method 9-Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be

given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by an emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the Director. The reports shall be submitted to the Director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170

Restriction of 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.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring 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-
 - (1) The permittee may observe once per month.
 - (2) 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 Attachment D (or its equivalent), 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) Whether the visible emissions were normal for the process;

- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed. (See Attachment E)

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

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

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the 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

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

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

1) Recordkeeping

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

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in 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 semi-annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

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

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

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or

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

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

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

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

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

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

EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.

- b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

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

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

This permit may be reopened for cause if:

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

- 2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

Attachment A Compliance Assurance Monitoring Plan (CAM)

Buckhorn Rubber Products (APCP Id. No. 173-0037) CAM Monitoring Approach for Particulate Matter Emissions Controlled by Dust Collector Filter System From Emission Points EU0010 (EP01)		
	Indicator #1	Indicator #2
Indicator	Visible Emissions	Pressure Drop
Measurement Approach	Visible emissions from each baghouse exhaust shall be monitored using EPA Reference Method 22-like procedures.	Pressure drop across each baghouse shall be measured with a differential pressure gauge.
Indicator Range	The indicator range is defined as no visible emissions. An excursion is defined as the presence of visible emissions.	The indicator range is defined as a pressure drop between 1 and 8 inches of water column (in H ₂ O) for each baghouse. An excursion is defined as a pressure drop that is less than 1 in H ₂ O and/or greater than 8 in H ₂ O.
	An excursion of either indicator constitutes an excursion. If visible emissions are present when the pressure drop is within its specified indicator range, the pressure drop indicator range shall be re-evaluated by the permittee. Excursions trigger an inspection, corrective action, and need to be reported in the next Semi-annual Monitoring Report. Excursions shall be corrected immediately upon detection; if an excursion results in excess emissions exceeding 1 hour, the permittee may elect to file a start-up, shutdown, and malfunction assertion under 10 CSR 10-6.050 if appropriate to the situation.	
QIP Threshold	The QIP threshold for any individual emission unit is 9 excursions in a 6-month reporting period. If an emission unit reaches the QIP threshold, the permittee shall submit a QIP for that unit along with the Semi-annual Monitoring Report for that reporting period.	
Performance Criteria		
Data Representativeness	Measurements shall be made at the emission point (i.e., baghouse exhaust).	Pressure drop taps are located at the inlet and outlet of each baghouse. The differential pressure gauges have a minimum accuracy of 0.25 in H ₂ O.
Verification of Operational Status	NA	Pressure drop taps are checked for plugging daily.
QA/QC Practices and Criteria	The visible emissions observer shall be familiar with EPA Reference Method 22 and follow Method 22-like procedures.	The differential pressure gauges shall be calibrated no less frequently than semi-annually in accordance with the manufacturer's specifications.
Monitoring Frequency	A 6-minute Method 22-like observation shall be performed daily.	Continuously.
Data Collection Procedure	The VE observation is manually recorded (i.e., documented) daily by the observer.	An instantaneous measurement shall be manually recorded daily.
Averaging Period	NA	None
Reporting	Summary information on the number, duration, and cause for any excursions and differential pressure gauge downtime shall be reported semi-annually as part of Buckhorn Rubber Company's Part 70 Semi-annual Monitoring Report.	

**Attachment E Method 9 Opacity Emissions Observation
 10 CSR 10-6.220 Compliance Demonstration**

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO _____ Signature of Observer

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received May 29, 2007;
- 2) 2009 Emissions Inventory Questionnaire, received June 3, 2010;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Air Pollution Control Program Construction Permits:

Permit Number	Description
0997-043	Installation of ten (10) new rubber injection-molding machines and a sandblasting station.
0997-043A	An amendment for minor changes to the emissions data reported in Permit No. 0997-043.
0599-021	Addition of six (6) new injection molding machines and four (4) new splice presses.
022000-014	Addition of seven (7) new injection molding machines and four (4) new splice presses.
092000-009	Addition of seven (7) new injection molding machines
092000-010	Increase production for seven (7) injection molding machines and four (4) splice presses by removing the carbon disulfide emissions limitation previously established in Permit No. 022000-014.
052001-017	Installation of five (5) blow molding machines, five (5) pneumatic transfer systems and a plastic grinder.
062001-006	Installation of four (4) Desma single station injection molding machines and one (1) compression molding machine. Additionally, three (3) existing compression machines were also evaluated.
102001-010	Installation of the dip tank coating line and the chain-on-edge spray coating line.
102001-010A	Revision to Permit Number 102001-010..

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 10-6.100, *Alternate Emission Limits*

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

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This regulation does not apply to Chain-on Edge Paint Oven (EU0160). According to Paragraph (1)(A)2. of this rule combustion equipment that uses exclusively pipeline grade natural gas is exempt. Therefore this rule was not included in the operating permit for this unit.

Construction Permit Revisions

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

- 1) Air Pollution Control Program Construction Permit #0580-006
Air Pollution Control Program Construction Permit #092000-009
Air Pollution Control Program Construction Permit #022001-006
These permits have no special conditions associated with them and are not incorporated into the operating permit.
- 2) Air Pollution Control Program Construction Permit #0997-043A
This amendment should have been classified as a permit correction. Permit #0997-043A just revised page four (4) of Permit #0997-043 and did not supercede the permit or the special conditions.
- 3) Air Pollution Control Program Construction Permit #092000-010A
Permit #092000-010 had one special condition stating it superceded Permit #022000-014. The amendment to Permit #092000-010 (Permit #092000-010A) has one special condition that states it supercedes Permit #0599-021 and Permit #022000-014. This special condition is not associated with any type of limitation, therefore it is not incorporated into the operating permit.
- 4) Air Pollution Control Program Construction Permit #102001-010A
This permit amendment to the Construction Permit 102001-001 is for replacement of an industrial spray paint booth. The chain-on-edge line was installed in March of 2001. This line consisted of two (2) small spray coating chambers (EP32 and EP33) and a single natural gas fired oven (EP34) with two (2) chambers. In January of 2008, a fire destroyed both of the spray coating chambers. Only one of the spray coating chambers will be replaced with a like kind replacement. In addition to the change in equipment, Buckhorn Rubber has changed the raw materials used with the chain-on-edge line. They are now using an aqueous adhesive with emissions below insignificance levels. This

permit has been amended to reflect these changes in their chain-on-edge process. Due to the raw material change in the process, the special conditions and emission rates listed in the original Construction Permit 102001-001 for the chain-on-edge line no longer apply.

5) Air Pollution Control Program Construction Permit #052001-017

Construction Permit 052001-017, issued on May 9, 2001 for five plastic blow molders with five pneumatic transfer systems and a plastic grinder. Only three of the plastic molders (with the pneumatic transfer systems) and the plastic grinder were installed. Therefore, the special conditions of this permit apply only to the units that are currently existing and being operated.

6) 10 CSR 10-6.060, Construction Permits Required

When a Construction Permit is incorporated into the Operating Permit, all aspects of the Construction Permit relating to emissions are to be maintained for an installation to be in compliance. According to 10 CSR 10-6.060, Construction Permits Required the Construction Permit consists of both the issued permit and Construction Permit application.

10 CSR 10-6.060 (6)(E)3. – “Any owner or operator who constructs, modifies or operates an installation not in accordance with the application submitted and the permit issued, including any terms and conditions made a part of the permit, or any owner or operator of an installation who commences construction or modification after May 13, 1982, without meeting the requirements of this rule, is in violation of this rule;”

Any installation that does not comply with the issued permit and Construction Permit application as it relates to emissions would be considered to be in violation of 10 CSR 10-6.060.

The Construction Permit application consists of numerous parameters that are not included in either the Construction Permit or the Operating Permit. Some examples of the criteria necessary for the application are site information; descriptions; plans; control efficiencies; flow parameters; design specifications; and drawings showing the design of the installation, the nature and amount of emission of each pollutant, and the manner in which emission units will be operated and controlled. These values submitted in the Construction Permit application define the criteria the regulatory agencies use to evaluate potential emissions and determine the ambient air quality of the surrounding area. It is essential the installation operate and construct the emission units according to the criteria related to emissions in the Construction Permit application, since the criteria are the basis behind the limitations established in the Construction Permit. If any of the parameters relating to emissions should change, the installation would be required to request and obtain a modification to their Construction Permit.

While an installation must adhere to their Construction Permit application, it is not necessary for the installation to certify and monitor each application parameter to show compliance. The installation is only required to monitor those parameters defined in specific State or Federal requirements or identified as Special Conditions in the Construction Permit. When construction permits are placed in Plant-wide and Emission Unit permit conditions in the Operating Permit, the installation is required to certify compliance with the parameters (monitoring, performance testing, recordkeeping and reporting) identified in the Plant-wide and Emission Unit permit conditions of the Operating Permit. However, the various parameters detailed in the Construction Permit application are still applicable to the installation, even though the criteria are not specifically listed in the Operating Permit.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After June 11, 1973*

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After May 18, 1978, and Prior to July 23, 1984*

40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.*

These standards are not applicable to the raw material storage tanks. The raw material stored in these tanks is not defined as either a petroleum liquid or a volatile organic liquid, which exempts each tank from any of these regulations.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart M, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products*

The final rule applies to a facility that owns or operates a miscellaneous metal parts and products surface coating operation that is a major source, or is located at a major source, or is part of a major source of HAP emissions. Buckhorn Rubber Products is a major source of HAP emissions and operates surface coatings that are performed using coatings that meet the definition of rubber-to-metal coatings in §63.3981, therefore the installation is subject to this rule.

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

The cleaning solvents covered by the MACT standard are solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

This standard does not apply because the cleaning solvent used by the installation contain potassium hydroxide (CAS#1310-58-3), sodium metasilicate (CAS#6834-92-0) and potassium carbonate (CAS#584-08-7), which are not included in the list of applicable solvents for subpart T.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

Banbury Mixer (Unit ID EU0010) utilizes a control device to limit PM emissions from the process and has a potential to emit 244.85 tons of PM pre-control, which exceeds the major source threshold

(applicability item c). The Banbury Mixer has a process weight limit of 8.56 pounds of PM per hour and uses fabric filters to achieve this limit. Therefore, Buckhorn Rubber Products has submitted CAM Plan as required by the CAM rule. The only other control devices at Buckhorn Rubber Products are fabric filters. The potential to emit pre-control emissions for the associated units are below the Title V trigger levels, and are therefore not subject to CAM.

Greenhouse Gas Emissions

This installation is a major source for greenhouse gases. Major stationary sources are required by the Clean Air Act (CAA) to obtain Part 70 operating permits. While Part 70 permits generally do not establish new emissions limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020(2)(A)23, into a comprehensive air permit. At the time of permit issuance, there were no applicable GHG requirements for this source.

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 operating permits at this time. In addition, Missouri regulations do not require the installation to report carbon dioxide (CO₂) emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. The applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting EPA’s Clean Air Markets website at: <http://camddataandmaps.epa.gov/gdm/index.cfm>

Other Regulatory Determinations

1) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule limits the amount of opacity of a source, and the allowed opacity is different for existing sources (defined as those sources installed or under construction in the outstate Missouri area on February 24, 1971) versus new sources. Accordingly, the emission units that are subject to this rule and their corresponding visible emission limitations are listed below.

Emission Unit#	EIQ Ref. #	Description	Installation Year	Visible Emission Limitation
EU0010	EP-01	Banbury Mixer	2005	20%
EU0020	EP-07	Mold and Casting Blast Room	1998	20%
EU0030	EP-10	Adhesive Spray Booth	1998	20%
EU0150	EP-33	Chain-on Edge Paint Booth #2	2000	20%
EU0160	EP-34	Chain-on Edge Paint Oven	2000	20%
EU0170	EP-35	Pneumatic Transfer System #1	2003	20%
EU0180	EP-35	Pneumatic Transfer System #2	2003	20%
EU0190	EP-35	Pneumatic Transfer System #3	2003	20%
EU0220	EP-35	Plastic Grinder	2002	20%
EU0240	EP-19	Abrasive Blast Line	1996	20%

2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight rate material processed. The emission units to which this rule applies are listed below. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate including particulate emission

control equipment. Process information and data used in these calculations are from the P70 Operating Permit Renewal Application, 2007 EIQ, and AP-42 and FIRE factors.

Also, one of the following equations from 10 CSR 10-6.400 is used to calculate the PM allowable limit:

$E = 4.10P^{0.67}$ for process weight rates up to 30 tons (60,000 lbs) per hour, and

$E = 55.0P^{0.11} - 40$ for process weight rates greater than 30 tons (60,000 lbs) per hour

Where: E = rate of emission in lb/hr; and

P = process weight rate in tons/hr (maximum hourly design rate)

Emission Unit #	PM Control Device & Efficiency	Maximum Design Rate	PM Emission Factor	Uncontrolled Emissions Sent to Control Device	Fugitive Emissions	PM Controlled/ Stack Emissions	PM Allowable Emission Rate
EU0010	Fabric Filter with 90% control efficiency and 70% capture efficiency	3.00 tons/hr	26.62 lbs/ton	55.90 lbs/hr	23.96 lbs/hr	5.59 lbs/hr	8.56 lbs/hr
EU0020	Fabric Filter with 99% control efficiency and 100 % capture efficiency	2.70 x 10 ³ lbs/hr	7.72 lbs/10 ³ lb	20.84 lbs/hr	—	0.21 lbs/hr	5.01 lbs/hr
EU0030	None (50 % fugitive & 50 % stack)	0.002 tons/hr	74.89 lbs/ton	—	0.07 lbs/hr	0.07 lbs/hr	N/A
EU0170	Fabric Filter with 99% control efficiency and 100 % capture efficiency	1.24 tons/hr	3.75 lbs/ton	4.65 lbs/hr	—	0.05 lbs/hr	4.74 lbs/hr
EU0180	Fabric Filter with 99% control efficiency and 100 % capture efficiency	1.24 tons/hr	3.75 lbs/ton	4.65 lbs/hr	—	0.05 lbs/hr	4.74 lbs/hr
EU0190	Fabric Filter with 99% control efficiency and 100 % capture efficiency	1.24 tons/hr	3.75 lbs/ton	4.65 lbs/hr	—	0.05 lbs/hr	4.74 lbs/hr
EU0220	Fabric Filter with 99% control efficiency and 100 % capture efficiency	1.24 tons/hr	3.75 lbs/ton	4.65 lbs/hr	—	0.05 lbs/hr	4.74 lbs/hr
EU0240	Fabric Filter with 99% control efficiency and 100 % capture efficiency	2.93 x 10 ³ lbs/hr	12.46 lbs/10 ³ lb	36.51 lbs/hr	—	0.37 lbs/hr	5.30 lbs/hr

EU0030 - Adhesive Spray Booth (EP-10)

At the maximum hourly design rate (0.002 tons/hr), the uncontrolled PM emission rate (0.14 lb/hr) is less than the allowed exemption level of 10 CSR 10-6.400(1)(B)11. (i.e., 0.5 lbs/hr), therefore this unit is not subject to the provisions of this rule.

EU0150 and EU0160 – Chain-on Edge Coating Line

According to Construction Permit 102001-010A, the chain-on-edge line applies an aqueous based adhesive at a maximum hourly design rate of 5.63 gallons per hour. It is equipped with a fabric filter designed to control particulate matter. Based on mass balance and material safety data sheets (MSDS), the PM potential emission from the chain-on-edge coating line (including emissions from natural gas fired drying oven) is 0.49 pounds per hour. Since the PM emission is less than the allowed exemption level of 10 CSR 10-6.400(1)(B)11, (i.e., 0.5 lbs/hr), this unit is not subject to the provisions of this rule.

Aqueous Adhesive Application by Spraying, Material Name = Chemlock 8560S

Density = 10 lb/gal; (wt %) Solids = 40.12%; (wt %) VOC = 0.1%

Transfer Efficiency = 60% (40% overspray)

Controls: PM Fabric Filter Efficiency = 94.6%

PM Emission: = (5.63 gal/hr)x(10 lb/gal)x(40.12 wt %)x(40% overspray)x(1-0.946)

EU0220 – Plastic Grinder (EP-35)

The potential uncontrolled PM emissions is significantly less than the allowable rate (limit), therefore no monitoring/recordkeeping or reporting is required.

According to 10 CSR 10-6.400(1)(B)7., the following fugitive sources are not subject to this rule.

- a) EU0040 through EU0130 - Ten (10) rubber injection molding machines (EP-18)
 - b) EU0150 and EU0160 – According to Construction Permit 102001-010, the maximum application rates of primer with adhesive topcoat and Lord Chemlock 8560D are 5.63 gallons per hour. All three (3) coatings are water-based coatings. Based on mass balance and material safety data sheets (MSDS), PM-10 potential emissions from the chain-on-edge coating line (including emissions from natural gas fired drying oven) is 0.05 tons/yr (0.01 lbs/hr)
- 3) The units listed in the “Emission Units Without Limitations” section in the front of this permit either have no applicable regulations associated with them or are considered insignificant activities.
- a) The sources in the table below listed as units without limitation are fugitive sources that do not emit regulated pollutants from a discrete stack or vent. These sources emit particulate matter directly into the ambient air. These sources do not have any type of capture/control devices and are not covered or required to control their emissions based on any past or current regulations. These sources are not subject to any specific rule except the core permit requirement of 10 CSR 10-6.170 and must comply with this requirement.

EQ Reference #	Description of Emission Unit
EP-08 & EP-23	Metal-prep Blasters (Sand)
EP-24	Metal-prep Blasters (Steel Shot)
EP-27	Grinder

EQ Reference #	Description of Emission Unit
EP-11	Mold Pre-Heat Oven
EP-12	Roof Exhaust Fans
EP-13	Small mold blaster (Plastic bead)
EP-20	Maintenance Blaster (Sand)
EP-29	Compression Mill
EP-16 & EP-21	Dip Tank Ovens
	Part Tumbler
	Lab Mill
	Machining Equipment

- b) The following is the list of equipment not subject to an applicable requirement identified as insignificant activities at the time of permit issuance. However, the installation is not limited to those activities listed, below.
- Large RES 1500HT Storage Tanks
 - Small SUNDEX8125 Storage Tanks
 - Degreaser MP
 - Automated Blast Line (Parts Washer)
 - Maintenance parts washer
 - Cryogenic Deflasher
 - Extruder
 - Infrared Light Ovens
 - Splice Presses (4)
 - Battery Chargers
 - Lab Presses
 - Lab Mixer
- c) The installation operates combustion units of varying size listed in the table below as units without limitation. All of these combustion units emit only combustion products, produce less than one hundred fifty (150) pounds per day of any air contaminant and have a maximum rated capacity of less than ten (10) million British thermal units (Btus) per hour heat input by using exclusively natural gas and/or propane. The Air Pollution Control Program has determined that units such as these are not necessary to include in the operating permit.
- Mold Pre-Heat Oven
 - Four (4)- Space heaters (Main Building)
 - Three (3)- Space Heaters (North Building)
 - Space Heater (Mix plant)

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

- 1) The specific pollutant regulated by that rule is not emitted by the installation;
- 2) The installation is not in the source category regulated by that rule;
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule;
- 4) The installation does not contain the type of emission unit which is regulated by that rule;
- 5) The rule is only for administrative purposes.

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

Prepared by:

Berhanu A. Getahun
Environmental Engineer

CERTIFIED MAIL: 70093410000190189060
RETURN RECEIPT REQUESTED

Mr. Larry Spilker
Buckhorn Rubber Products, Inc.
5151 Industrial Drive
Hannibal, MO 63401

Re: Buckhorn Rubber Products, Inc., 173-0037
Permit Number: **OP2011-034**

Dear Mr. Spilker:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 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 do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bgk

Enclosures

c: Northeast Regional Office
PAMS File: 2007-05-141