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: OP2017-010
Expiration Date: FEB 22 2022
Installation ID: 201-0110
Project Number: 2013-06-015

Installation Name and Address
Construction Trailer Specialists, Inc.
2535 Rose Parkway
Sikeston, MO 63801
Scott County

Installation Description:
Construction Trailer Specialists, Inc. manufactures hopper trailers, bottom dump trailers, end dump trailers, and van trailers that weigh between 11,000 lbs. and 15,000 lbs. (5.5 tons – 7.5 tons). Hazardous air pollutant (HAP) emissions: Methyl isobutyl ketone, ethylene glycol, monobutyl ether, xylene, ethylbenzene, toluene, and methyl ethyl ketone will be emitted from this source.

Parent Company's Name and Address
THI, Inc.
2535 Rose Parkway
Sikeston MO, 63801

Prepared by
David Buttig
Operating Permit Unit

Director or Designee
Department of Natural Resources

FEB 22 2017
Effective Date
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I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-03</td>
<td>Prime/Paint Spray Booth</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Description of Emission Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Fired Dryer (2.0 MMBtu/hr) (EP-04)</td>
</tr>
<tr>
<td>Finish Assembly</td>
</tr>
<tr>
<td>Fabricating</td>
</tr>
<tr>
<td>Welding (EP-01)</td>
</tr>
<tr>
<td>Sand Blasting (EP-02)</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

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

None
### III. Emission Unit Specific Emission Limitations

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

<table>
<thead>
<tr>
<th>EIQ Reference #</th>
<th>Description (Service Date)</th>
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<tr>
<td>EP-03</td>
<td>Paint/Primer Spray Booth: MHDR = 13 gal/hr; Controlled by a fabric filter; Construction date 1999.</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Emission Limitation & Work Practice Standards:**

1) Maximum Volatile Organic Content (VOC) Content – the permittee shall not use any new paint, gun wash, and/or thinner in the paint booth (EP-03) that has a higher VOC content than those listed in the Application for Authority to Construct. (See Attachment F)

2) Solvent Cloths – the permittee shall keep the solvents and cleaning solutions in sealed containers whenever the materials are not in use. Construction Trailer Specialists Inc. shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.

3) Control Device – The fabric filter in the paint booth (EP-03) must be in use at all times when the paint booth is in operation. The filter shall be operated and maintained in accordance with the manufacturer’s specifications.

**Monitoring:**

1) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.

2) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.

3) The manufacturer’s recommendations shall be followed with regard to installation and frequency of replacement of the filters.

**Recordkeeping:**

1) The permittee shall maintain records of the inspections of the filter including when they occur. Attachment G contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.

2) All records shall be maintained for five (5) years.

3) These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
Reporting:
The permittee shall report any deviations of this permit condition to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

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Permit Condition 2
10 CSR 10-6.075 Maximum Achievable Control Technology
40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

Emission Limitations:
1) The permittee must limit organic HAP emissions to the atmosphere from the affected source to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period determined according to the requirements in §§63.3941, 63.3951, or 63.3961. [§63.3890(b) and §63.3890(b)(1)]
2) Any coating operation(s) for which the permittee uses the compliant material option as specified in §63.3891(a), must be in compliance with the applicable emission limit in §63.3890 at all times. [§63.3900(a)(1)]

Compliance Demonstration:
1) For each compliance period to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. [§63.3942(a)]
2) If the permittee uses any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in §63.3942(a), it is a considered a deviation from the emission limitations and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5). [§63.3942(b)]
3) As part of each semi-annual compliance report required by §63.3920, the permittee shall identify the coating operation(s) in which used the compliant material option. If there were no deviations from the applicable emission limit in §63.3890, the permittee shall submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890 were used, and no thinner and/or other additive, or cleaning material that contained organic HAP were used, according to §63.3941(a). [§63.3942(c)]
4) The permittee shall maintain records as specified in §§63.3930 and 63.3931. [§63.3942(d)]

Test Methods and Calculations:
The permittee shall determine the mass fraction of organic HAP for each coating, thinner, and/or other additive, and cleaning material used during the compliance period by using one of the options in §63.3941(a)(1) through (5). [§63.3941(a)]
**Monitoring:**
The permittee shall operate and maintain the affected source, according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]

**Recordkeeping:**
1) The permittee shall collect and keep records of the data and information specified in §63.3930. Failure to collect and keep these records is a deviation from the applicable standard. [§63.3930]
2) The permittee shall keep a copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart MMMM, and the documentation supporting each notification and report. [§63.3930(a)]
3) The permittee shall keep a current copy of information provided by materials suppliers or manufacturers, such as manufacturer’s formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducts testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee use information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
4) The permittee shall keep a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee uses the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. (see Attachment A) [§63.3930(d)]
5) The permittee shall keep 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. (see Attachment A) [§63.3930(e)]
6) The permittee shall keep a record of the volume fraction of coating solids for each coating used during each compliance period. (see Attachment A) [§63.3930(f)]
7) The permittee must keep records of the date, time, and duration of each deviation. [§63.3930(j)]
8) All records must be in the 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)]
9) As specified in §63.10(b)(1), the permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
10) The permittee shall keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining three years.

**Reporting:**
1) The permittee shall submit semi-annual compliance reports for each affected source according to the requirements of §63.3920(a)(1) through (5). 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). [§63.3920(a)]
2) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

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**Emission Limitations:**
1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any source installed or constructed after February 24, 1971, any visible emissions with an opacity greater than 20%.
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 of air contaminants with an opacity up to 60%.

**Monitoring:**
1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be 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 following monitoring schedule must be maintained:
   a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
   b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
   c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or once per month, the permittee may continue from that point forward in the established monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
4) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**
1) The permittee shall maintain records of all observation results (See Attachments C or C1), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2) The permittee shall maintain records of any equipment malfunctions. (See Attachment D)
3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment E)

4) Attachments C or C1, D, and E contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.

6) All records shall be maintained for five years.

**Reporting:**

1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.

2) Reports of any deviations from monitoring, 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 10 CSR 10-6.065(6)(C)1.C.(III).
IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

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

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

### 10 CSR 10-6.060 Construction Permits Required

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

### 10 CSR 10-6.065 Operating Permits

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


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

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

1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

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

**10 CSR 10-6.165 Restriction of Emission of Odors**

This is a State Only permit requirement.

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

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

**Emission Limitation:**

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

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

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

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

Emission Limitation:
The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 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 USEPA 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 B (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 USEPA Method 9 opacity tests performed.

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.
10 CSR 10-6.280 Compliance Monitoring Usage

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

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

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

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 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

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

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

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

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

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

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

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

**10 CSR 10-6.065(6)(C)1.B Permit Duration**

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

**10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits**

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

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

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

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

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

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

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

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

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

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

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

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

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

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.
10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

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

10 CSR 10-6.065(6)(C)1.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 semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

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

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

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

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

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd.,
Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.

a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.

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

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

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:

a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

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

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

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

**Coating, Thinner and/or other Additive and Cleaning Materials**

**Compliance Period:** ______________

<table>
<thead>
<tr>
<th>Name of each coating, thinner and/or additive and cleaning materials used</th>
<th>Volume of material used (gallons)</th>
<th>Mass fraction of organic HAP (%)</th>
<th>Coating Solids Volume fraction (%)</th>
<th>Material Density (lbs/gallon)</th>
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Volume – Volume of each coating, thinner and/or other additive and cleaning material used in gallons.
Mass Fraction – Mass fraction of organic HAP for each coating, thinner, and/or other additive and cleaning material used (unless material is tracked by weight).
Volume Fraction – Volume fraction of coating solids for each coating used.
Density of each coating, thinner and/or other additive and cleaning material used in lbs/gallon.
Attachment B
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

EP-05 Welding Processes

\[ Process \text{ Weight Rate} = 0.065 \frac{\text{tons}}{\text{hr}} \]

\[ Allowable \text{ Emission Rate} = 4.10 \times (Process \text{ Weight Rate})^{0.67} \]

\[ Allowable \text{ Emission Rate} = 4.10 \times 0.065^{0.67} = 0.657 \frac{\text{lbs}}{\text{hour}} PM_{10} \]

\[ Maximum \text{ Emission Rate at MHDR} = 0.655 \frac{\text{lb}}{\text{hr}} < 0.657 \frac{\text{lbs}}{\text{hour}} PM_{10} \]

Emission rate will always be less than the allowable emission rate contained in this rule.
## Attachment C

### Method 22 (Outdoor Observation Log)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Observer</td>
<td>Date</td>
</tr>
<tr>
<td>Sky Conditions</td>
<td></td>
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<tr>
<td>Precipitation</td>
<td></td>
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<tr>
<td>Wind Direction</td>
<td>Wind Speed</td>
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</tbody>
</table>

Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.

<table>
<thead>
<tr>
<th>Observation Clock Time</th>
<th>Observation Period Duration (minute:second)</th>
<th>Accumulative Emission Time (minute:second)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Begin Observation</td>
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<td>End Observation</td>
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</tbody>
</table>
### Attachment C1

<table>
<thead>
<tr>
<th>Date</th>
<th>Method 22 Test Observer</th>
<th>Visible Emissions (Yes/No)</th>
<th>Emissions Normal (Yes/No)</th>
<th>IF Visible Emissions, was a Method 9 done?</th>
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### Attachment D

**Inspection/Maintenance/Repair/Malfunction Log**

Emission Unit # ________________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
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</table>
# Method 9 Opacity Emissions Observations

<table>
<thead>
<tr>
<th>Hour</th>
<th>Minute</th>
<th>Seconds</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
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<td>0</td>
<td>Attached</td>
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<td>0</td>
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<td>15</td>
<td>Attached</td>
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<td>Detached</td>
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## SUMMARY OF AVERAGE OPACITY

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

Readings ranged from ________ to ________ % opacity.

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

YES  NO  Signature of Observer
## Attachment F

### Emission Information for Air Construction Permit Application

#### Form 2.3 Uncontrolled VOC Emissions Information (duplicate this form as needed)

<table>
<thead>
<tr>
<th>INSTALLATION NAME:</th>
<th>FIPS COUNTY NO.</th>
<th>PLANT NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>(A.) Construction Trailer Specialists, Inc.</td>
<td>(B.) 201</td>
<td>(C.) 0110</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>POINT NO.</th>
<th>SCC CODE</th>
</tr>
</thead>
<tbody>
<tr>
<td>(D.) EP-3</td>
<td>(E.) 4-02-001-10</td>
</tr>
</tbody>
</table>

#### Application Rate

<table>
<thead>
<tr>
<th>APPLICATION METHOD</th>
<th>MATERIAL TYPE</th>
<th>APPLICATION RATE (GALLONS/HOUR) (H.)</th>
<th>% BY WEIGHT OF VOC IN MATERIAL (L.)</th>
<th>DENSITY (LBS/GAL) (J.)</th>
<th>LBS. OF VOC PER UNIT (K.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gun Cleaner</td>
<td>Gun Wash</td>
<td>2,640 Gal.</td>
<td>100</td>
<td>6.87</td>
<td>6.87</td>
</tr>
<tr>
<td>Spray</td>
<td>Paint 139</td>
<td>55 Gal.</td>
<td>36</td>
<td>9.1</td>
<td>3.28</td>
</tr>
<tr>
<td>Spray</td>
<td>Primer 8404</td>
<td>5,800 Gal.</td>
<td>27</td>
<td>12.5</td>
<td>3.38</td>
</tr>
<tr>
<td>Spray</td>
<td>Paint 8800</td>
<td>3,650 Gal.</td>
<td>39</td>
<td>8.3</td>
<td>3.23</td>
</tr>
<tr>
<td>Spray</td>
<td>Paint 8815A</td>
<td>11,857 Gal.</td>
<td>34</td>
<td>9.7</td>
<td>3.29</td>
</tr>
<tr>
<td>Spray</td>
<td>Paint F75BC6</td>
<td>159 Gal.</td>
<td>61</td>
<td>7.56</td>
<td>4.61</td>
</tr>
<tr>
<td>Spray</td>
<td>Thinner 33</td>
<td>590 Gal.</td>
<td>100</td>
<td>7.4</td>
<td>7.4</td>
</tr>
</tbody>
</table>

**TOTAL (SCC Units) (L.)** 24,751

**NOTE:** Attach Material Safety Data Sheets (MSDS) for Verification

Enter Total amount calculated above in Estimated Annual Throughput under Operating Rate/Schedule on Form 2.0, Emission Point Information

**Comments:**

VOC Emission Vactor:

- Average VOC content of waste = 93,910 lb VOC/24,751 gal mix = 3.79 lb/gal
- Gallons of waste shipped off-site = 22,172 gal
- VOC shipped off-site = 22,172 gal x 3.79 lb/gal = 71,526 lb VOC
- VOC emission factor = (93,910 lb – 71,526 lb)/24,751 gal = 2.89 lb/gal
## Attachment G

**Inspection/Maintenance/Repair/Malfunction Log**

Emission Unit # _____________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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</tbody>
</table>
STATEMENT OF BASIS

Installation Description
Construction Trailer Specialists, Inc. manufactures hopper trailers, bottom dump trailers, and van trailers that weigh between 11,000 lbs. and 15,000 lbs. (5.5 tons – 7.5 tons). Hazardous air pollutant (HAP) emissions: Methyl isobutyl ketone, ethylene glycol monobutyl ether, xylene, ethylbenzene, toluene, and methyl ethyl ketone will be emitted from this source.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>0.72</td>
</tr>
<tr>
<td>HAP</td>
<td>Total Xylenes: 54.68</td>
</tr>
<tr>
<td></td>
<td>Ethylbenzene: 17.5</td>
</tr>
<tr>
<td>NO₂</td>
<td>0.85</td>
</tr>
<tr>
<td>PM_{10}</td>
<td>8.12</td>
</tr>
<tr>
<td>PM_{2.5}</td>
<td>0.18</td>
</tr>
<tr>
<td>SO₂</td>
<td>0.005</td>
</tr>
<tr>
<td>VOC</td>
<td>198.95</td>
</tr>
<tr>
<td>CO₂e</td>
<td>1,060</td>
</tr>
</tbody>
</table>

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

Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM_{10})</td>
<td>0.95</td>
<td>1.24</td>
<td>1.13</td>
<td>0.47</td>
<td>--</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM_{2.5})</td>
<td>0.35</td>
<td>0.39</td>
<td>0.41</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO₂)</td>
<td>--</td>
<td>0.02</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>--</td>
<td>0.02</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>0.17</td>
<td>0.17</td>
<td>--</td>
<td>0.38</td>
<td>0.38</td>
</tr>
</tbody>
</table>

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

1) Part 70 Operating Permit Application, received June 04, 2013;
2) 2015 Emissions Inventory Questionnaire, received May 03, 2016;
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
4) Construction Permit #012000-010, Issued December 02, 1999.
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.

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.

### Construction Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>012000-010</td>
<td>Installation of a semi-trailer manufacturing facility.</td>
</tr>
<tr>
<td>052007-001</td>
<td>Removal of the annual installation-wide 40 ton volatile organic compound (VOC) limit established in Permit No. 012000-010.</td>
</tr>
</tbody>
</table>

### Construction Permit Revisions
The following revisions were made to construction permits for this installation:

**Construction Permit #012000-010;**
The special conditions in the construction permit were superseded by construction permit #52007-001.

**Construction Permit #052007-001;**
Special Condition Number 1 was not included in this operating permit because it is a superseding condition. The remaining special conditions were included in this operating permit, but subsequently renumbered.

### New Source Performance Standards (NSPS) Applicability
None.

### Maximum Achievable Control Technology (MACT) Applicability
This facility is an existing source that became subject to Subpart MMMM upon the removal of the 40 ton VOC limitation (in Construction Permit #012000-010) with the issuance of Construction Permit #052007-001 on May 03, 2007. There was no equipment added at this time.

§63.3890(c)(1) – If the general use or magnet wire surface coating operations subject to only one of the emission limits specified in paragraphs (a)(1), (3), (b)(1), or (3) of this section account for 90 percent or more of the surface coating activity at your facility (i.e., it is the predominant activity at your facility), then compliance with that one emission limitations in this subpart for all surface coating operations constitutes compliance with the other applicable emission limits.

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
None.
Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, Compliance Assurance Monitoring (CAM)
The CAM rule applies to each pollutant specific emission unit that:
- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulatory Determinations

The following information and calculations were taken from Construction Permit #052007-001:

The welding operation (EP-1) generates small amounts of particulate matter and HAPS, specifically chromium, nickel and manganese. Two different electrodes are used in the welding area: ERNiCrMO and ER70S. Based on maximum historical usage, the maximum amount of weldment for each electrode-type is 16 and 114 pounds per hour, respectively. The abrasive blasting operation (EP-2) has a maximum blasting rate of 22 pounds per hour which is also based on maximum historical usage. The maximum hourly design rate for the paint booth (EP-3) is based on a maximum of five (5) trailers being able to be painted in a 10-hour period at this facility. The facility utilizes a maximum of 4.5 gallons of primer, 0.5 gallon of thinner, 2 gallons of fun wash, and 12.2 gallons of paint per trailer. Painted trailers will be dried either by forced heat or by air-drying. With forced heat, a two (2) MMBtu/hr burner that utilizes natural gas is be used. The only control device at the installation consists of a fabric filter located in the paint booth (EP-3) for controlling PM$_{10}$ emissions. The potential to emit (PTE) is based on the maximum production capacity of 5 trailers in an 8-hour shift.

The emissions determined for the spray booth (EP-3) were estimated using information obtained from the Material Safety Data Sheets and painting requirements for each semi-trailer as provided by the applicant. A mass balance approach was used and 100% of the VOC and HAP content of the paints, gun wash, and thinner are assumed to be emitted into the atmosphere. PM$_{10}$ emissions for the spray booth were evaluated based on the solids content of the paint and transfer efficiency from the spray gun (50%). If not specifically stated, the solids content of the material was estimated by taking the density of the paint and subtracting the VOC content and assuming that 50% of remainder to be PM$_{10}$. PM$_{10}$ emissions are controlled through the use of a high efficiency filter having a minimum control efficiency of 95%.

10 CSR 10-6.405 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

The only combustion unit at this installation is a 2.0 MMBtu natural gas fired dryer (EP-04). The dryer is a direct heating unit and therefore not subject to this rule.

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

§6.260(3)(A) limits emissions to five hundred parts per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/m$^3$) of sulfuric acid or sulfur trioxide or any combination of those gases. As demonstrated by the calculations below, the natural gas fired dryer (EP-04) is highly unlikely to exceed the standard.
Natural gas SO\textsuperscript{2} emission factor \( \left( \frac{\text{lbs}}{\text{MMBtu}} \right) = \frac{0.6 \, \frac{\text{lbs}}{10^6 \, \text{scf}}}{1020 \, \frac{\text{MMBtu}}{10^6 \, \text{scf}}} = 5.88 \times 10^{-4} \, \frac{\text{lb}}{\text{MMBtu}} \)

(AP – 42 Table 1.4 – 2(7/98)

\[ \text{ppmv SO}_2 = \left( \frac{5.88 \times 10^{-4} \, \text{lb}}{\text{MMBtu}} \right) \times \left( \frac{\text{MMBtu}}{10610 \, \text{wscf}} \right) \times \left( \frac{\text{ppmw}}{1.667 \times 10^{-7} \, \text{lb}} \text{scf} \right) \times \left( \frac{0.45 \, \text{ppmw}}{\text{ppmw}} \right) = 153.3 \, \text{ppmv} \]

(Appendix A – 7 to Part 60)

For this reason, there were no provisions for this rule put into the permit.

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

<table>
<thead>
<tr>
<th>Emission Point Number</th>
<th>Description</th>
<th>MHDR (lb/hr)</th>
<th>Emission Factor (lb/1000 lb)</th>
<th>PM\textsubscript{10} Emission Rate (lb/hr)</th>
<th>PM\textsubscript{10} Emission Rate (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-02</td>
<td>Sand Blasting</td>
<td>22.00</td>
<td>13.00</td>
<td>0.286</td>
<td>1.253</td>
</tr>
</tbody>
</table>

Source: AP-42 – Sand Blasting of Mild Steel Panels, Table 13.2.6-1. This is a conservative estimate because the facility uses slag as a media, and AP-42 Section 13.2 states that the emissions from slag usage is less than sand, but provided no emission factor.

As shown in the above table, the abrasive blasting operation is an insignificant (<0.5 lbs/hr) source of fugitive particulate matter. Since emissions from the unit are considered fugitive, this rule does not apply per §6.400(1)(B)(7).

EP-03 has a fabric filter that must be used at all times, therefore, per 10 CSR 10-6.400(1)(B)14, “Coating operations equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers’ specifications or comparable maintenance procedures that meet or exceed manufacturers’ specifications” this rule does not apply to EP-03.

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).
Response to Public Comments

A draft of the Construction Trailer Specialists, Inc.’s Part 70 Operating Permit was placed on public notice on June 27, 2014, by the Missouri Department of Natural Resources (MDNR). Comments were received on July 21, 2014 from Mark Smith, Air Permitting and Compliance Branch Chief at Environmental Protection Agency Region 7. The six (6) comments are presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following.

EPA Comment #1:

Emission limitation and work practice standards #1, in Permit Condition 1, limits the permittee to materials with a volatile organic compound (VOC) content no higher than those listed in the "Application for Authority to Construct." In accordance with EPA policy, permit conditions must impose practically enforceable emission limits and practically enforceable production or operational limits. Emission limitation #1 does not appear to be practically enforceable and therefore EPA recommends MDNR include a numerical limitation, as given on Form 2.3 of EP-3 in Application for Authority to Construct #2006-03-080, and include this Form 2.3 as an attachment to the operating permit with clear reference to the form in emission limitation #1. EPA would also recommend that MDNR include the Application for Authority to Construct #2006-03-080 and the subsequent Permit to Construct # 052007-001 as permit reference documents in the operating permit statement of basis.

Missouri Air Pollution Control Program Response to EPA Comment #1:

Form 2.3 of EP-3 in the Application for Authority to Construct #2006-03-080 has been added to the permit as Attachment F and has been referenced to in Permit Condition 1 in order to have the maximum VOC content for the materials.

EPA Comment #2:

Permit Condition 1 includes three (3) emission limitations and work practice standards, however, Permit Condition 1 does not include any equivalent compliance verification monitoring or recordkeeping. There is no record being kept of whether or not the control device is working, and there are no records being maintained to verify the permittee remains below the VOC limitation. The Missouri Department of Natural Resources operating permit contents requirements at 10 CSR 10 6.065(c)IC(1)(b) require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), where the applicable requirement does not require periodic monitoring. This periodic monitoring shall be sufficient to yield reliable data for the relevant time period representative of the permittee's compliance. Permit Condition 1 incorporates the applicable requirements from construction permit #052007-001 in which there are no periodic monitoring requirements associated with the limitations. Therefore, it appears that Missouri regulations would require the operating permit to add periodic monitoring and EPA recommends MDNR add a section of periodic monitoring to Permit Condition 1 which tracks verification of compliance with the emission limitations and work practice standards.
Missouri Air Pollution Control Program Response to EPA Comment #2:

Monitoring, Recordkeeping, and Reporting requirements have been added to Permit Condition 1. Attachment G has been added to keep record of maintenance/inspection of the paint booth.

EPA Comment #3:

The customary practice, when incorporating applicable requirements into the operating permit, is to present the requirements in the form of "who" shall do "what" and "how" and by "when." The "who" is most often identified as the "permittee." Permit Condition 2 incorporates the applicable requirements associated with 40 CFR Part 63, subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (MACT). The draft operating permit does a good job of incorporating the applicable requirements, however, with the exception of emission limitation #1, none of the requirements are presented in the form of "who" is required to do "what" and "how" and by "when." The incorporated requirements are worded almost exactly as in the MACT. Incorporating applicable requirements does not necessarily mean "word-for-word," therefore, EPA recommends MDNR consider rewording the incorporated applicable MACT MMMM requirements indicating the "permittee shall" do what the applicable requirement requires.

Missouri Air Pollution Control Program Response to EPA Comment #3:

Permit Condition 2 has been modified to indicate the “permittee shall” to the applicable requirements included in the permit condition.

EPA Comment #4:

Permit Condition 3 Emission Limitation #1 says: "no owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%." EPA provides the following suggestion for MDNR's consideration:

a) Replace "No owner or other person shall" with the words "Permittee shall not;" and
b) Replace the "from any new source" with the words "any source installed or constructed after February 24, 1971."

Missouri Air Pollution Control Program Response to EPA Comment #4:

The suggested changes have been made.

EPA Comment #5:

Core Permit Requirements Section IV incorporates the applicable requirements associated with open burning from 10 CSR 10-6.045. Construction Trailer Specialists, Inc. is located in Scott County, which is not part of the definition of the Kansas City metropolitan area; Springfield-Greene County area; and the St Louis metropolitan area nor would Scott County be considered in the St. Joseph area. Therefore, the draft operating permit appears to include requirements that are not applicable to Construction Trailer Specialists, Inc. and EPA recommends MDNR remove the non-applicable requirements.
Missouri Air Pollution Control Program Response to EPA Comment #5:

The location specific requirements for the Kansas City metropolitan area, Springfield-Greene County area, St. Louis metropolitan area, and the St. Joseph’s area have been removed from Section IV Core Permit Requirements.

EPA Comment #6:

The Statement of Basis, included with this draft operating permit, has no mention of greenhouse gases (GHG); except within the updated potential to emit table for the installation. The table includes CO2e as a pollutant; and a potential to emit of 1,060 tons per year. The statement of basis included with all Part 70 operating permits issued by MDNR, have included a section describing the permitted facility greenhouse gases (GHG) status. Therefore MDNR should consider including their following standard language for sources that are not major for greenhouse gases but are subject to the mandatory reporting rule; in the Statement of Basis.

a) "This installation is not a major source for greenhouse gases. While Part 70 Permits generally do not establish new emission limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020 (2)(A)23, into a comprehensive air permit. This source is subject to 40 CFR Part 98- Mandatory 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 CO2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's actual CO2 emissions were not included within this permit. The applicant is required to report actual CO2 emissions data directly to EPA."

Missouri Air Pollution Control Program Response to EPA Comment #6:

In order for a facility to be required to report CO2e emissions, the following conditions must be met according to 40 CFR Part 98:

1) The facility does not meet the requirements of either (a)(1) or (a)(2) of §98.2. [§98.2(a)(3)(i)]
2) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hr or greater. [§98.2(a)(3)(ii)]
3) The facility emits 25,000 metric tons CO2e or more per year in combined emissions from all stationary fuel combustion sources. [§98.2(a)(3)(iii)]

All three of these conditions are not met by the facility; therefore, the suggested paragraph was not added to the operating permit.
Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:dbj

Enclosures

Southeast Regional Office
PAMS File: 2013-06-015

Recycled paper