



INTERMEDIATE STATE 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 here in.

Intermediate Operating Permit Number: OP2011-045
Expiration Date: SEP 26 2016
Installation ID: 117-0012
Project Number: 2010-11-073

Installation Name and Address

Donaldson Company, Inc.
400 Donaldson Drive
Chillicothe, MO 64601
Livingston County

Parent Company's Name and Address

Donaldson Company, Inc.
P.O. Box 1299
Minneapolis, MN 55440-1299

Installation Description:

Donaldson Company, Inc. manufactures engine air cleaners and filtration systems at their Chillicothe, Missouri location. The installation cuts and presses sheet and bar steel to form the air cleaners. The installation then welds, solders, grinds, washes, and paints the air cleaners. The installation performs both powder coating and liquid painting. Ovens dry/cure the painted air cleaners. The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

SEP 27 2011

Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Donaldson Company, Inc. manufactures engine air cleaners and filtration systems at their Chillicothe, Missouri location. The installation cuts and presses sheet and bar steel to form the air cleaners. The installation then welds, solders, grinds, washes, and paints the air cleaners. The installation performs both powder coating and liquid painting. Ovens dry/cure the painted air cleaners. The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter \leq Ten Microns (PM ₁₀)	0.11	0.07	0.81	0.34	1.82
Particulate Matter \leq 2.5 Microns (PM _{2.5})	0.005	0.005	0.10	0.02	0.17
Sulfur Oxides (SO _x)	0.0004	0.0003	0.01	0.002	0.01
Nitrogen Oxides (NO _x)	0.06	0.06	1.38	0.26	2.20
Volatile Organic Compounds (VOC)	6.47	3.67	2.88	7.19	7.31
Carbon Monoxide (CO)	0.05	0.05	1.16	0.22	1.85
Ammonia (NH ₃)	0.002	0.002	0.04	0.01	0.07
Hazardous Air Pollutants (HAPs)	4.34	2.56	2.35	2.10	0.80
Xylene (1330-20-7)	3.37	1.83	1.21	1.27	-
Ethylbenzene (100-41-4)	0.73	0.39	0.43	0.43	0.43
Hydrogen Chloride (7647-01-0)	-	-	0.37	0.37	0.37
Ethylene Glycol (107-21-1)	-	0.20	-	-	-
Methyl Isobutyl Ketone (108-10-1)	0.20	0.12	0.22	0.02	-
Manganese Compounds (20-12-2)	0.03	0.01	0.11	-	-
Cobalt Compounds (20-06-4)	0.003	0.0003	0.01	-	-

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description
EP-03	Electrostatic Solvent-Based Paint Booth
EP-04	Touch-Up Solvent-Based Paint Booth
EP-13	Conveyorized Spray Washer Stage 1
EP-14	Conveyorized Spray Washer Stage 4
EP-16	Conveyorized Spray Washer Stage 6
EP-19	Hook Burnoff Oven
EP-49	Heating Boiler I
EP-50	Heating Boiler II
EP-52A	Grinding Station
EP-53	Office Heat
EP-54	Space Heater/Makeup Air Unit I
EP-55	Space Heater/Makeup Air Unit II

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit	Description
EF-1	Body Seam Sealants
EF-19	Grinding Fugitives
EFs 2-18 and EF-20	18 Resistance Welding Stations
EF-21	1 Arc Welding Station
EP-01	520 Paint Vault
EP-02	504 Paint Vault
EP-05	Solvent/Liquid Paint Cure Oven 520
EP-11	1 Arc Welding Station
EP-12	Conveyorized Spray Washer Entrance
EP-17	Conveyorized Spray Washer
EP-18	Dryoff Oven
EP-25A	3 Electrostatic Powder Paint Spray Booths
EP-25B	Powder Paint Cure Oven
EP-30	1 Resistance Welding Station
EP-43	Powder Paint Cure Oven
EP-44	Powder Paint Cure Oven
EP-45	511 Tube Saw Grinding Booth
EP-46	511 Plasma Cutter
EP-47	Powder Paint Cure Oven
EP-52B	7 Arc Welding Stations
EP-52C	24 Resistance Welding Stations
EP-56	LP Storage Tank Valves
EP-57	LP Storage Tank Valves
EP-58A	3 Arc Welding Stations
EP-58B	15 Resistance Welding Stations

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 on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitations:

1. The permittee shall emit less than ten (10) tons of each individual Hazardous Air Pollutant (HAP) from the entire installation in any consecutive 12-month period.
2. The permittee shall emit less than twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall calculate the monthly and rolling 12-month HAP emissions from the entire installation for each individual HAP and for total combined HAP using Attachment D or an equivalent form generated by the permittee.
2. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all HAP containing materials at the installation.
3. Records may be kept in either written or electronic form.
4. All records shall be kept for no less than five years and be made available immediately to Missouri Department of Natural Resources' personnel upon request.

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 (10) days after the end of the month during which records indicate an exceedance of either of the HAP emission limitation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitations:

The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall calculate the monthly and rolling 12-month VOC emissions from the entire installation using Attachment D or an equivalent form generated by the permittee.
2. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all VOC containing materials at the installation.

3. Records may be kept in either written or electronic form.
4. All records shall be kept for no less than five years and be made available immediately to Missouri Department of Natural Resources' personnel upon request.

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 (10) days after the end of the month during which records indicate an exceedance of the VOC emission limitation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001				
Emission Points: 13, 14, 16, 49, 50, 53, 54, and 55				
10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating				
Emission Unit	Description	Fuel	Heat Input (MMBtu/hr)	Installation Date
EP-13	Conveyorized Spray Washer Stage 1	Natural Gas	7.2	1991
EP-14	Conveyorized Spray Washer Stage 4	Natural Gas	4.0	1991
EP-16	Conveyorized Spray Washer Stage 6	Natural Gas	2.0	1991
EP-49	Heating Boiler I	Natural Gas	9.8	1977
EP-50	Heating Boiler II	Natural Gas	9.8	1977
EP-53	Office Heat	Natural Gas	1.0	1982
EP-54	Space Heater/Makeup Air Unit I	Natural Gas	5.5	1991
EP-55	Space Heater/Makeup Air Unit II	Natural Gas	5.5	1972

Emission Limitations:

1. The permittee shall not emit particulate matter in excess of 0.36 pounds per million BTU of heat input from new indirect heating sources EP-13, EP-14, EP-16, EP-49, EP-50, EP-53, and EP-55.
2. The permittee shall not emit particulate matter in excess of 0.46 pounds per million BTU of heat input from existing indirect heating source EP-54.

Operational Limitation:

The permittee shall calibrate, maintain and operate the emission units according to the manufacturer’s specifications and recommendations.

Monitoring/Recordkeeping:

1. Maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment A or an equivalent form generated by the permittee.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to Department of Natural Resources’ personnel upon request.
4. All records shall be maintained for five years.
5. Attachment B contains calculations which demonstrate that these emission units will never exceed the emission limitation while burning the specified fuel.

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 (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002 Emission Point 19 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 0292-002, Issued February 4, 1992	
Emission Unit	Description
EP-19	Hook Burnoff Oven

Operational Limitations:

1. Special Condition 1: Absolutely no plastic or Teflon parts shall be processed in EP-19 Hook Burnoff Oven. A permit modification from the Air Pollution Control Program shall receive approval prior to any changes in the type and quantities of materials to be processed in the oven other than what is contained in the original permit application.
2. Special Condition 2: Operating personnel must have adequate training and knowledge of the operation of EP-19 Hook Burnoff Oven. Training shall include the manufacturer's instructions and guidelines of operation.
3. Special Condition 3: The burnoff oven shall be operated in accordance with the manufacturer's instructions and guidelines of operation at all times.

Monitoring/Recordkeeping:

1. Special Condition 4: The manufacturer's instructions and guidelines of operation for EP-19 Hook Burnoff Oven shall be retained at the installation.
2. Special Condition 5: A copy of this construction permit shall be kept at the facility.
3. The permittee shall maintain an employee training using Attachment C or an equivalent form generated by the permittee.
4. Records may be kept in either written or electronic form.
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:

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

PERMIT CONDITION 003		
Emission Points: 3 and 4		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants and 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes		
Emission Unit	Description	Control Device
EP-03	Electrostatic Solvent-Based Paint Booth	D4 Dry Filter
EP-04	Touch-Up Solvent-Based Paint Booth	D5 Dry Filter

Emission Limitations:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from these emission sources 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 aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.
3. The permittee shall not emit particulate matter in excess of 0.11 lbs/hr from EP-03 and 0.06 lbs/hr from EP-04.
4. 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.

Operational Limitations:

1. The permittee shall control particulate emissions from paint booths EP-03 and EP-04 using dry filters. The dry filters shall be equipped with a gauge or meter, which indicates the pressure drop across the filter. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The permittee shall maintain and operate the dry filters according to the manufacturer's specifications and recommendations.
3. The dry filters shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.1" of water column.
 - a) Exception: Due to a lack of cake on the filter, the permittee is not restricted to a minimum pressure drop across the control device for the first 24 hours after replacement of a filter.

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the dry filters at least once each operating day while the unit is operating. The operating pressure drop range shall be specified based on normal operation and manufacturer's recommendations.
2. The permittee shall maintain an operating and maintenance log for each control device using Attachment A or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all bag replacements.
3. The permittee shall retain a copy of the manufacturer's specifications.
4. Attachment E contains calculations documenting that the permittee is in compliance with the particulate matter emission limits while the dry filters are being properly maintained and operated.

5. Records may be kept in either written or electronic form.
6. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
7. All records shall be maintained for five years.

Reporting:

The permittee shall report any deviations from the emission limitations, operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004		
Emission Point 52A		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants and 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes		
Emission Unit	Description	Control Device
EP-52A	Grinding Station	ED-52 Torit Cartridge Filter

Emission Limitations:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from these emission sources 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 aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.
3. The permittee shall not emit particulate matter in excess of 2.22 lbs/hr from EP-52B Grinding Station.
4. 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.

Operational Limitations:

1. The permittee shall control particulate emissions from this emission unit using a cartridge filter. The cartridge filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. The gauge or meter shall be located such that Department of Natural Resources' employees may easily observe them. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The permittee shall maintain and operate the cartridge filter according to the manufacturer's specifications and recommendations.
3. The cartridge filter shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.2" of water column.
 - a) Exception: Due to a lack of cake on the filter, the permittee is not restricted to a minimum pressure drop across the control device for the first 24 hours after replacement of a filter.

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the cartridge filter at least once each operating day while the unit is operating. The operating pressure drop range shall be specified based on normal operation and manufacturer's recommendations.

2. The permittee shall maintain an operating and maintenance log for the control device using Attachment A or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all filter replacements.
3. The permittee shall retain a copy of the manufacturer's specifications.
4. Attachment E contains calculations documenting that the permittee is in compliance with the particulate matter emission limits while the cartridge filter is being properly maintained and operated.
5. Records may be kept in either written or electronic form.
6. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
7. All records shall be maintained for five years.

Reporting:

The permittee shall report any deviations from the emission limitations, operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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 on the date of permit issuance. 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 residential premises having not more than four dwelling units, provided that the refuse originates on the same premises.
 - b) Yard waste.
- 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) Donaldson Company, 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 Donaldson Company, 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(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(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 complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 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 submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) Full paper EIQs shall be submitted to the Air Pollution Control Program by no later than April 1st after the end of the reporting year. Full electronic EIQs shall be submitted via MoEIS by no later than May 1st after the end of the reporting year.
- 6) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 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.

Monitoring:

- 1) The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
- 2) The permittee shall 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 no violation of this regulation be observed 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.
 - c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall document all readings on Attachment C, or its equivalent, noting the following:
 - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
 - b) Whether the visible emissions were normal for the installation.
 - c) Whether equipment malfunctions contributed to an exceedance.
 - d) Any violations and any corrective actions undertaken to correct the violation.

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 10-6.250 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, §(5)(E)2 and §(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, §(5)(C)1 and §(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) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than 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.
 - 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 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 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 §(5)(C)1 and §(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(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

The permittee may at any time switch the liquid paints used within EP-03 and EP-04 provided that the new paint has a density less than or equal to 12 lbs/gallon, contains less than or equal to 100% solids, and has a transfer efficiency greater than or equal to 60%.

The permittee may at any time switch the powder paints used within EP-25A Electostatic Powder Paint Spray Booth provided that the new paint contains less than or equal to 100% solids, less than or equal to 0.70% PM_{2.5}, and has a transfer efficiency greater than or equal to 50%.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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 the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - 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 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; and
 - 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.

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

The application utilized in the preparation of this permit was signed by Mr. John Stafford, 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (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,
- 2) 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,
- 3) 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 §(5)(E)1.A and §(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 B
10 CSR 10-3.060 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*. The total heat input (Q) in MMBtu/hr of all fuel burning units at the installation: [10 CSR 10-3.060(3)(C)]

Emission Unit	Description	Heat Input (MMBtu/hr)
EP-13	Conveyorized Spray Washer Stage 1	7.2
EP-14	Conveyorized Spray Washer Stage 4	4.0
EP-16	Conveyorized Spray Washer Stage 6	2.0
EP-49	Heating Boiler I	9.8
EP-50	Heating Boiler II	9.8
EP-53	Office Heat	1.0
EP-54	Space Heater/Makeup Air Unit I	5.5
EP-55	Space Heater/Makeup Air Unit II	5.5
Total Q		44.8

The allowable PM emission limitation for existing indirect heating sources at an installation having a total heat input rate between 10 MMBtu/hr and 2,000 MMBtu/hr is determined by the following equation: [10 CSR 10-3.060(5)(B)]

$$E = 0.90(Q)^{-0.174}$$

$$E = 0.90(44.8)^{-0.174} = 0.46$$

Emission Unit	Emission Factor (lbs/MMscf)	Emission Factor (lbs/MMBtu)	Emission Limit (lbs/MMBtu)	Is the Emission unit in compliance?
EP-54	8.7	0.009	0.46	YES

The 8.7 lbs/MMscf emission factor comes from FIRE for Process SCC 10500106. The average heating value of 1,050 Btu/scf for natural gas was taken from AP-42 Appendix A. The calculations demonstrate that the emission unit has worst-case emissions far below the applicable emission limit while being properly maintained and operated; therefore, no further monitoring or recordkeeping is required while combusting natural gas. The emission unit is in compliance with the emission limit without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

Attachment B Continued
10 CSR 10-3.060 Compliance Demonstration

The allowable PM emission limitation for new indirect heating sources at an installation having a total heat input rate between 10 MMBtu/hr and 2,000 MMBtu/hr is determined by the following equation: [10 CSR 10-3.060(5)(B)]

$$E = 1.31(Q)^{-0.338}$$

$$E = 1.31(44.8)^{-0.338} = 0.36$$

Emission Unit	Emission Factor (lbs/MMscf)	Emission Factor (lbs/MMBtu)	Emission Limit (lbs/MMBtu)	Is the Emission unit in compliance?
EP-13	7.6	0.007	0.36	YES
EP-14	7.6	0.007	0.36	YES
EP-16	7.6	0.007	0.36	YES
EP-49	8.7	0.009	0.36	YES
EP-50	8.7	0.009	0.36	YES
EP-53	8.7	0.009	0.36	YES
EP-55	8.7	0.009	0.36	YES

The 7.6 lbs/MMscf emission factor comes from FIRE for Process SCC 10200602. The 8.7 lbs/MMscf emission factor comes from FIRE for Process SCC 10500106. The average heating value of 1,050 Btu/scf for natural gas was taken from AP-42 Appendix A. The calculations demonstrate that each emission unit has worst-case emissions far below the applicable emission limit while being properly maintained and operated; therefore, no further monitoring or recordkeeping is required while combusting natural gas. The emission units are in compliance with the emission limit without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

Attachment E
10 CSR 10-6.400 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*.

Allowable PM emission limitation for sources having a process weight rate (P) of 30 tons/hr or less:

$$E = 4.1(P)^{0.67}$$

Potential PM Emission Rate = P (tons/hr) x PM Emission Factor (lb/ton)

$$\text{Potential PM Concentration} = \frac{\text{Potential PM Emission Rate (lb/hr)} \times 7000 \text{ (gr/lb)}}{\text{Stack Flowrate (scf/min)} \times 60 \text{ (min/hr)}}$$

Uncontrolled Calculations

Emission Unit	P (tons/hr)	PM Emission Factor (lb/ton)	Potential PM Emission Rate (lb/hr)	PM Emission Rate Limit (lb/hr)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)	Potential PM Emissions (tons/yr)
3	0.005	800	4.0	0.11	0.04	0.3	16.43
4	0.002	800	1.6	0.06	0.01		4.93
52A	0.4	1500	600	2.22	1.84		2628

The particulate emission factor for the solvent-based paint booths, EP-03 and EP-04, is based upon the worst-case paint which has a density of 12 lbs/gallon and contains 100% solids. A transfer efficiency of 60% was assumed. Each paint booth has a stack flowrate of 12,338 scf/min. The paint booths are not in compliance with the PM emission rate limits without the aid of a control device.

The particulate emission factor for EP-52A Grinding Station was taken from the installation's previous operating permit OP2006-023 to be 1.5 lbs/piece – where each piece weighs 2 lbs. (The emission factor was converted to lbs/ton as the process rate is in tons/hr.) A stack flowrate of 37,968 scf/min was used within the above calculations.

The potential PM emissions from EP-03 and EP-04 paint booths are below 100 tons/yr; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

The potential PM emissions of EP-52A Grinding Station are above the major source threshold of 100 tons/yr; however, the installation has accepted plantwide emission limitations on HAPs and VOC to become an intermediate source. So long as the installation remains an intermediate, rather than a Part 70 source, they are not subject to 40 CFR Part 64 *Compliance Assurance Monitoring*.

Attachment E Continued
10 CSR 10-6.400 Compliance Demonstration

Controlled Calculations

Emission Unit	Control Device Efficiency	Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)
3	97	0.11	0.11	0.001	0.3
4	97	0.03	0.06	0.0004	
52A	99.7	1.8	2.22	0.006	

EP-03 and EP-04 were given 97% control efficiencies for dry filters. The permittee is in compliance with the PM emission rate limits while the dry filters are being properly maintained and operated.

EP-52A Grinding Station was given 99.7% control efficiency for a Torit cartridge filter.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

- To become a synthetic minor source of HAPs, the installation has taken a voluntary condition to limit plantwide emissions below the HAP major source thresholds (see Permit Condition PW001). Without this limit, the installation's potential yearly emissions are estimated to be 26.71 tons HAP and 12.46 tons Xylene (1330-20-7).
- To become a synthetic minor source of VOCs, the installation has taken a voluntary condition to limit plantwide emissions below the VOC major source threshold (see Permit Condition PW002). Without this limit, the installation's potential yearly emissions are estimated to be 233.90 tons VOC.

If the installation decides to become a Part 70 rather than an Intermediate installation they will need to submit a Compliance Assurance Monitoring (CAM) plan for EP-52A Grinding Station to comply with 40 CFR Part 64 *Compliance Assurance Monitoring*.

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) Intermediate Operating Permit Application, received November 30, 2010
- 2) 2009 Emissions Inventory Questionnaire
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable to the installation and has not been applied within this permit. The installation is in an ozone attainment area.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. The only sulfur emitting sources at the installation are natural gas combustion sources; however, these sources exclusively combusting pipeline grade natural gas are exempt from this regulation per 10 CSR 10-6.260(1)(A)2. Exempt natural gas combustion sources:

Emission Unit	Description
EP-05	Solvent/Liquid Paint Cure Oven 520
EP-13	Conveyorized Spray Washer Stage 1
EP-14	Conveyorized Spray Washer Stage 4
EP-16	Conveyorized Spray Washer Stage 6
EP-17	Conveyorized Spray Washer
EP-18	Dryoff Oven
EP-19	Hook Burnoff Oven
EP-25B	Powder Paint Cure Oven

Emission Unit	Description
EP-43	Powder Paint Cure Oven
EP-44	Powder Paint Cure Oven
EP-47	Powder Paint Cure Oven
EP-49	Heating Boiler I
EP-50	Heating Boiler II
EP-53	Office Heat
EP-54	Space Heater/Makeup Air Unit I
EP-55	Space Heater/Makeup Air Unit II

Construction Permits

Construction Permit No. 1291-006, Issued December 9, 1991:

- This construction permit is for the replacement of an existing high volume spray paint line with a new powder coating system.
- This construction permit was issued with no special conditions.

Construction Permit No. 0292-002, Issued February 4, 1992:

- This construction permit is for the installation of EP-19 Hook Burnoff Oven.
- Special Conditions 1 – 5 have been applied within this permit (see Permit Condition 002).

No Construction Permit Required Determination, Issued September 22, 1998:

- This no construction permit required determination is for the relocation of EP-19 Hook Burnoff Oven.

Construction Permit No. 1099-020, Issued October 18, 1999:

- This construction permit is for the installation of EP-87 Paint Booth.
- This construction permit was issued with special conditions.
- The installation never installed EP-87 Paint Booth; therefore, the special conditions of the construction permit were not included within this operating permit. The two year construction period has already passed; therefore, the construction permit is no longer effective. The installation cannot install EP-87 Paint Booth without applying for and receiving a new construction permit.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts D, Da, Db, and Dc – *Standards of Performance for Steam Generating Units* are not applicable to the installation and have not been applied within this permit. Subparts D and Da are only applicable to steam generating units with a heat input rate greater than 250 MMBtu/hr. [§60.40(a)]

and §60.40a(a)] Subpart Db is only applicable to steam generating units with a heat input rate greater than 100 MMBtu/hr. [§60.40b(a)] Subpart Dc is only applicable to steam generating units with a heat input rate greater than 10 MMBtu/hr. [§60.40c(a)] EP-49 Heating Boiler I and EP-50 Heating Boiler II are the installation's largest steam boilers each having a maximum heat input rate of 9.8 MMBtu/hr. 40 CFR Part 60, Subpart E – *Standards of Performance for Incinerators* is not applicable to the installation and has not been applied within this permit. Subpart E is applicable to incinerators with charging rates greater than 50 tons/day. [§60.50(a)] EP-19 Hook Burnoff Oven, constructed in 1988, is an industrial solid waste incinerator with a charging rate of 0.3 tons/day (based upon the maximum hourly solvent/paint/powder coating usage rates of the installation's liquid paint and powder coating operations).

40 CFR Part 60, Subpart DDDD – *Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units* is applicable to the installation; however, at this time there are no provisions for incorporation in this operating permit. The state of Missouri is required to submit a plan to EPA by March 21, 2012, including emission limitations for rack reclamation units. [§60.2505(d)] *Rack reclamation unit* means a unit that burns the coatings off racks used to hold small items for application of a coating. The unit burns the coating overspray off the rack so the rack can be reused. EP-19 Hook Burnoff Oven meets the definition of rack reclamation unit. Subject units will be required to meet the emission limitations by March 21, 2016, or three years after EPA accepts Missouri's plan, whichever date is earlier. [§60.2535(b)]

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart MMMM – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* is not applicable to the installation and has not been applied within this permit. This subpart is applicable to major HAP sources using 250 gallons per year, or more, of coatings that contain HAP in the surface coating of miscellaneous metal parts and products. [§63.3881(b)] The installation has been a synthetic minor source of HAPs since May 9, 2006 - prior to the existing affected source compliance date of January 2, 2007, listed within §63.3883(b). As a synthetic minor source of HAPs, the installation is not required to comply with this subpart.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to the installation and has not been applied within this permit. This subpart is applicable to industrial boilers and process heaters at major HAP sources. [§63.7485] The installation has been a synthetic minor source of HAPs since May 9, 2006 - prior to the existing affected source compliance date of March 21, 2014, listed within §63.7495(b). As a synthetic minor source of HAPs, the installation is not required to comply with this subpart.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation and has not been applied within this permit. This subpart is applicable to area HAP sources paint stripping operations using methylene chloride, autobody refinishing operations, and spray applications of coatings containing chromium, lead, manganese, nickel, or cadmium. [§63.11169(a)-(c)] The installation does emit chromium and manganese; however, these emissions come from welding operations rather than spray coating application.

40 CFR Part 63, Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* is not applicable to the installation and has not been applied within this permit. This subpart is applicable to sources listed under SIC codes 3621, 3699, 3499, 3443, 3441, 3433, 3531, 3533, 3561, 3462, 3399, and 3494 per EPA’s guidance document *SIC/NAICS Code Applicability Charts for Nine Metal Fabrication and Finishing Sources* available at: <http://www.epa.gov/ttn/atw/area/met-fab-6x-applicability.xls> The installation is not classified under any of the listed SIC codes but instead by SIC code 3714 Motor Vehicle Parts and Accessories.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 tons/year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 38,638.62 tons, classifying the installation as a minor source of GHGs. Please note that the potential emissions of greenhouse gases from this installation are only for stationary sources as §70.2 defines emission unit as “any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act.”

Other Regulatory Determinations

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Conditions 003 and 004). The following emissions sources are also subject to this regulation, but they emit less than 0.5 lbs PM/hr and are assumed to be in compliance; therefore, no conditions were included within the permit for these sources:

Emission Unit	Description
EF-1	Body Seal Sealants
EF-19	Grinding Fugitives
EFs 2-18 and EF-20	18 Resistance Welding Stations
EF-21	1 Arc Welding Station
EP-05	Solvent/Liquid Paint Cure Oven 520
EP-11	1 Arc Welding Station
EP-13	Conveyorized Spray Washer Stage 1
EP-14	Conveyorized Spray Washer Stage 4
EP-16	Conveyorized Spray Washer Stage 6
EP-17	Conveyorized Spray Washer

Emission Unit	Description
EP-30	1 Resistance Welding Station
EP-43	Powder Paint Cure Oven
EP-44	Powder Paint Cure Oven
EP-45	511 Tube Saw Grinding Booth
EP-46	511 Plasma Cutter
EP-47	Powder Paint Cure Oven
EP-49	Heating Boiler I
EP-50	Heating Boiler II
EP-52B	7 Arc Welding Stations
EP-52C	24 Resistance Welding Stations
EP-53	Office Heat

Emission Unit	Description
EP-18	Dryoff Oven
EP-19	Hook Burnoff Oven
EP-25A	3 Electrostatic Powder Paint Spray Booths
EP-25B	Powder Paint Cure Oven

Emission Unit	Description
EP-54	Space Heater/Makeup Air Unit I
EP-55	Space Heater/Makeup Air Unit II
EP-58A	3 Arc Welding Stations
EP-58B	15 Resistance Welding Stations

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* is applicable to the installation and has been applied within this permit (see Permit Conditions 003 and 004). The following particulate emission sources are exempt as indirect heating sources under 10 CSR 10-6.400(1)(B)6:

Emission Unit	Description
EP-13	Conveyorized Spray Washer Stage 1
EP-14	Conveyorized Spray Washer Stage 4
EP-16	Conveyorized Spray Washer Stage 6
EP-17	Conveyorized Spray Washer
EP-49	Heating Boiler I

Emission Unit	Description
EP-50	Heating Boiler II
EP-53	Office Heat
EP-54	Space Heater/Makeup Air Unit I
EP-55	Space Heater/Makeup Air Unit II

The following particulate emission sources are exempt per 10 CSR 10-6.400(1)(B)12 as they have potential particulate emissions below 0.5 lbs/hr:

Emission Unit	Description	MHDR	Inherent Control Device	PM Emission Factor	Potential PM Emission Rate (lb/hr)
EF-19	Grinding Fugitives	226 pieces/hr	3.75% Enclosure	0.0015 lbs/piece	0.33
EFs 2-18 and EF-20	18 Resistance Welding Stations	180 pieces/hr		0.0004 lbs/piece	0.07
EF-21	1 Arc Welding Station	0.02 1000 lbs/hr	-	5.2 lbs/1000 lbs	0.10
EP-11	1 Arc Welding Station	0.02 1000 lbs/hr	-	5.2 lbs/1000 lbs	0.10
EP-25A	3 Electrostatic Powder Paint Spray Booths	0.05 tons/hr each	98.959% Torit filter (powder paint recycle)	1000 lbs/ton	0.49 each
EP-30	1 Resistance Welding Station	10 pieces/hr	-	0.0004 lbs/piece	0.004
EP-45	511 Tube Saw Grinding Booth	50 pieces/hr	-	0.0015 lbs/piece	0.08
EP-46	511 Plasma Cutter	2.5 pieces/hr	-	0.005 lbs/piece	0.01
EP-52B	7 Arc Welding Stations	0.02 1000 lbs/hr each	-	5.2 lbs/1000 lbs	0.10 each
EP-52C	24 Resistance Welding Stations	240 pieces/hr	-	0.0004 lbs/piece	0.10
EP-58A	3 Arc Welding Stations	0.06 1000 lbs/hr	3.75% Enclosure	5.2 lbs/1000 lbs	0.30
EP-58B	15 Resistance Welding Stations	150 pieces/hr		0.0004 lbs/piece	0.06

Particulate emission source EF-1 Body Seams Sealant is exempt as a fugitive emission source per 10 CSR 10-6.400(1)(B)7.

The following emission sources combust natural gas which does not meet the definition of process weight within 10 CSR 10-6.400(2)(A):

Emission Unit	Description
EP-05	Solvent/Liquid Paint Cure Oven 520
EP-13	Conveyorized Spray Washer Stage 1
EP-14	Conveyorized Spray Washer Stage 4
EP-16	Conveyorized Spray Washer Stage 6
EP-17	Conveyorized Spray Washer
EP-18	Dryoff Oven
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Emission Unit	Description
EP-43	Powder Paint Cure Oven
EP-44	Powder Paint Cure Oven
EP-47	Powder Paint Cure Oven
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EP-53	Office Heat
EP-54	Space Heater/Makeup Air Unit I
EP-55	Space Heater/Makeup Air Unit II

An updated Potential to Emit for the installation is provided in the following table:

Pollutant	Potential to Emit (tons/year) ¹
CO	26.43
CO _{2e}	38,638.62
NH ₃	1.03
NO _x	32.12
PM ₁₀	29.32
PM ₂₅	2.59
SO _x	0.19
VOC	249.01
HAP	35.04
Xylene (1330-20-7)	16.99
Ethylene Glycol (107-21-1)	12.26
Methyl Isobutyl Ketone (108-10-1)	6.61
Toluene (108-88-3)	3.56
Ethylbenzene (100-41-4)	2.88
Antimony Compounds (20-00-8)	2.55
Isopropylbenzene (98-82-8)	2.24
Epichlorohydrin (106-89-8)	1.82
Hexane (110-54-3)	0.58
Acrylic Acid (79-10-7)	0.23
Hydroquinone (123-31-9)	0.17
Manganese Compounds (20-12-2)	0.16
Phthalic Anhydride (85-44-9)	0.11

¹Potential emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted. HAP and VOC emissions were estimated by scaling up the installations actual emissions by a factor of 8,760 potential hours of operation/3,120 actual hours of operation as the installation could not provide maximum hourly design rates for surface coating operations. EP-58A, EP-58B, and EFs 2-20 were given 3.75% inherent control efficiency for PM₁₀ for being totally enclosed. EP-03 and EP-04 Paint Booths were given 97% control efficiency for PM₁₀ and Cobalt Compounds (20-07-5) due to dry filters required by Permit Condition 003. EP-25A Electrostatic Powder Paint Spray Booth was given 98.959% inherent control efficiency for PM₁₀ and Antimony Compounds (20-00-8) due to a Torit cartridge filter used to capture non-transferred powder paint coating for reapplication/recycle. EP-52A Grinding Station was given a 99.7% control efficiency for PM₁₀, Chromium Compounds (20-06-4), Cobalt Compounds (20-07-5), Manganese Compounds (20-12-2), and Nickel Compounds (20-14-4) due to a baghouse required by Permit Condition 004. Paint emissions were calculated as being emitted directly from paint booths with curing/drying ovens only emitting combustion products.

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:

Alana L. Rugen
Environmental Engineer

CERTIFIED MAIL: 70093410000190188353
RETURN RECEIPT REQUESTED

Mr. John Stafford
Donaldson Company, Inc.
400 Donaldson Drive
Chillicothe, MO 64601

Re: Donaldson Company, Inc., 117-0012
Permit Number: **OP2011-046**

Dear Mr. Stafford:

Enclosed with this letter is your intermediate 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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at 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/ark

Enclosures

c: Northeast Regional Office
PAMS File: 2010-11-073