



Missouri Department of Natural Resources  
Air Pollution Control Program

## 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:** OP2010-032  
**Expiration Date:** APR 13 2015  
**Installation ID:** 091-0011  
**Project Number:** 2007-05-029

**Installation Name and Address**

DRS Sustainment Systems Inc.  
#1 McDaniel Street  
West Plains, MO 65775  
Howell County

**Parent Company's Name and Address**

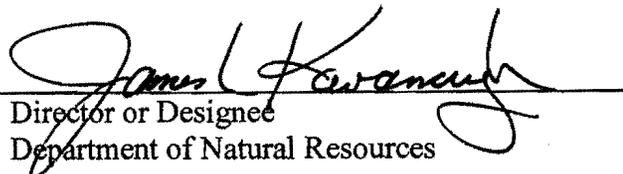
DRS Technologies  
5 Sylvan Way  
Parsippany, NJ 07054

**Installation Description:**

DRS Sustainment Systems Inc. is a manufacturing facility with the principal product being truck trailers for the military. The processes involved include shot blasting, welding, painting, drying, and engine testing. The facility occupies approximately 100 acres and operates thirteen paint booths as part of the manufacturing process. All painting and priming operations, except for minor touch-up operations, are performed in enclosed areas where filters are utilized to control particulate emissions.

APR 14 2010

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

DRS Sustainment Systems Inc. is a manufacturing facility with the principal product being truck trailers for the military. The processes involved include shot blasting, welding, painting, drying, and engine testing. The facility occupies approximately 100 acres and operates thirteen paint booths as part of the manufacturing process. All painting and priming operations, except for minor touch-up operations, are performed in enclosed areas where filters are utilized to control particulate emissions.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	0.63	0.02	0.02	0.74	46.22	0.15	-	3.18
2007	0.62	0.05	0.45	3.04	30.85	0.24	-	2.89
2006	0.56	0.32	3.92	22.75	36.12	1.26	-	8.05
2005	0.38	0.02	0.05	3.23	58.63	0.65	-	6.81
2004	0.39	0.34	-	2.88	61.35	0.59	-	14.91
2003	0.23	0.20	-	2.72	22.65	0.53	-	0.11

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	Homemade Paint Booth
EU0020	Binks Paint Booth
EU0030	Binks Paint Booth
EU0040	Binks Paint Booth
EU0050	Binks Paint Booth
EU0060	Binks Paint Booth
EU0070	Binks Paint Booth
EU0080	Binks Paint Booth
EU0090	Binks Paint Booth
EU0100	Devilbliss Paint Booth
EU0110	Paint Booth, Topcoat
EU0120	Paint Booth, Wash Primer
EU0130	Paint Booth, Primer
EU0140	Wheel-A-Brator Shot Blast Bag Tower
EU0150	One 0.5 MMbtu/hr Burnoff Oven
EU0160	Facility-Wide Welding Operations
EU0240	Internal Combustion Engine Testing - Diesel or Jet Fuel (JP-8) Each manufactured unit contains two diesel engines which are tested prior to shipment to the customer

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### **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.

#### Description of Emission Source

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EU0170	16 (<10 MMbtu/hr) Natural Gas Fired Paint Dryers & Ovens Two 3.85 MMbtu/hr Dryers Two 4.44 MMbtu/hr Dryers Four 5.64 MMbtu/hr Dryers Three 2.9 MMbtu/hr Dryers One 1.88 MMbtu/hr Drying Oven One 0.55 MMbtu/hr Drying Oven One 1.2 MMbtu/hr Infrared Oven One 0.96 MMbtu/hr Infrared Oven One 3.01 MMbtu/hr Convection Oven
EU0180	8 (<10 MMbtu/hr) Air Makeup Units 11.222 MMbtu/hr total
EU0190	3 (<10 MMbtu/hr) Cleaning Tank Heaters One 1.57 MMbtu/hr One 1.12 MMbtu/hr One 0.77 MMbtu/hr
EU0200	3 (0.55 MMbtu/hr) Power Washers 6 (0.35 MMbtu/hr) Power Washers
EU0210	5 (500 gallon) Above Ground Diesel Storage Tanks 3400 gallon Above Ground Kerosene Storage Tank 1800 gallon Above Ground Kerosene Storage Tank 1100 gallon Above Ground Kerosene Storage Tank 2700 gallon Above Ground Kerosene Storage Tank
EU0220	2 (500 gallon) Above Ground Gasoline Storage Tanks
EU0230	200+ (<1MMbtu/hr) Natural Gas Space Heaters 15.83 MMbtu/hr total

### **DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 1088-013A
- 2) Construction Permit 0197-027
- 3) Construction Permit 042009-007

## 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.

**PERMIT CONDITION PW001**  
**40 CFR Part 63 Subpart M**  
**National Emission Standards for Hazardous Air Pollutants for Surface Coating of**  
**Miscellaneous Metal Parts and Products**

### Emission Limitation:

1. The permittee shall limit organic HAP emissions to the atmosphere from the affected source to no more than 2.6 pounds organic HAP per gallon of coating solids used during each rolling 12-month compliance period (general use subcategory per 40 CFR 63.3890(b)(1)).
2. The affected source applies to the surface coating of any miscellaneous metal parts or products. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. These activities do not comprise surface coating if they are not directly related to the application of the coating.
3. All coatings (as defined in 40 CFR 63.3981), thinners and/or other additives, and cleaning materials used in the affected source must be included when determining whether the organic HAP emissions rate is equal to or less than the applicable emission limit.
4. The permittee must use at least one of the three compliance options listed in 40 CFR 63.3891. Currently, the permittee is using the “emission rate without add-on controls” compliance option. If the permittee switches between compliance options for any coating operation or group of coating operations, they must document this switch as required by 63.3930(c) and report it in the next semiannual compliance report required in 63.3920.

### Monitoring:

1. When using the “emission rate without add-on controls” compliance option, the permittee shall monitor the following.
  - a) Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in 40 CFR 63.3941(a).
  - b) Determine the volume fraction of coating solids per gallon of coating for each coating used during each month according to the requirements in 40 CFR 63.3941(b).
  - c) Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results, information from the supplier or manufacturer of the material, or reference sources providing density and specific gravity data for pure materials. If the permittee is using powder coatings in the compliance determination, determine the density of powder coatings using ASTM Method D5965-02, or information from the supplier. If the permittee purchases materials or monitors consumption by weight instead of volume, they do not need to determine material density.

- d) Determine the volume of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, they do not need to determine the volume of each material used.
  - e) Calculate the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of 40 CFR 63.3951(e).
  - f) Calculate the total volume of coating solids used using Equation 2 of 40 CFR 63.3951(f).
  - g) Calculate the organic HAP emission rate for the compliance period using Equation 3 of 40 CFR 63.3951(g).
2. The permittee must perform the calculations listed above on a monthly basis using data from the previous 12 months of operation.

**Record Keeping:**

1. A copy must be kept of each notification and report that the permittee submitted to comply with this subpart, and the documentation supporting each notification and report.
2. A current copy of information provided by materials suppliers or manufacturers must be kept, 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 addition, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine the mass fraction or organic HAP, density, or volume fraction of coating solids, a copy must be kept of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, a summary sheet of the provided by the manufacturer or supplier must be kept.
3. For each compliance period the following records must be kept.
  - a) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.
  - b) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and the cleaning materials used for each month using Equations 1, 1A through 1C, and 2 of for CFR 63.3951; and, if applicable, the calculation used to determine mass or organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.39451; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951.
4. A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
5. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
6. A record of the volume fraction of coating solids for each coating used during each compliance period.
7. If the permittee uses the emission rate without add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
8. If the permittee uses an allowance in Equation 1 of 63.3951 for organic HAP contained in waste materials sent or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4), they must keep records listed below.

- a) The name and address of each TSDf to which the permittee sent waste materials for which they use an allowance in Equation 1.
  - b) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1.
  - c) The methodology used in accordance with 40 CFR 63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDf each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring and supporting calculations and documentation, including the waste manifest for each shipment.
9. The permittee must keep records of the date, time, and duration of each deviation.
  10. All records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
  11. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  12. The permittee must keep each record on-site for at least 2 years. Records may be kept off-site for the remaining 3 years.

**Reporting:**

1. The permittee must submit semiannual compliance reports for each affected source to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
2. The information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
3. Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
4. Each semiannual compliance report must be postmarked or delivered no later than October 1 or April 1, whichever date is the first date following the end of the semiannual reporting period.
5. The semiannual compliance report must contain the information specified below.
  - a) Company name and address.
  - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - c) Date of report and beginning and ending dates of the reporting period.
  - d) Identification of the compliance option of options specified in 40 CFR 63.3891 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, they must report the beginning and ending dates for each option they used.
  - e) If the permittee used the emission rate without add-on controls compliance option, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period (see 40 CFR 63.3890 and 63.3891 for requirements if other compliance options are used).
  - f) If there no deviations from the emission limitations in 40 CFR 63.3890, 63.3892 and 63.3893 that apply to the permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.

- g) If the permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in 63.3890, the semiannual compliance report must contain the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit, the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, and a statement of the cause of each deviation.

**PERMIT CONDITION PW002**  
**10 CSR 10-6.060**  
**Construction Permits Required**  
**Construction Permit 042009-007**

**Emission Limitation:**

DRS Sustainment Systems, Inc. (DRS Sustainment Systems) shall emit less than 250.00 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period. For the purpose of the special conditions of this permit, entire installation includes all emission units and processes identified in the "DRS Emission Point Summary" dated April 24, 2007 and received by the Air Pollution Control Program as Attachment A of DRS Sustainment Systems' Part 70 operating permit renewal application on May 1, 2007. The diesel engine testing operations (EP-49) shall also be considered as part of the entire installation.

**Monitoring/Record Keeping:**

Attachment A, or equivalent forms approved by the Air Pollution Control Program, shall be used to demonstrate compliance with the emission limitation above. DRS Sustainment Systems shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all surface coating materials.

**Reporting:**

DRS Sustainment Systems 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 the records indicate that the source exceeds the limitations listed above.

### 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.

<b>EU0010 THROUGH EU0130 – PAINT BOOTHS</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>2007 EIQ Reference #</b>
EU0010	Homemade Paint Booth	Homemade End to End Draft	EP04
EU0020	Binks Paint Booth	Binks Downdraft	EP07
EU0030	Binks Paint Booth	Binks End to End Draft	EP08
EU0040	Binks Paint Booth	Binks End to End Draft	EP09
EU0050	Binks Paint Booth	Binks Downdraft	EP10
EU0060	Binks Paint Booth	Binks Downdraft	EP11
EU0070	Binks Paint Booth	Binks Downdraft	EP12
EU0080	Binks Paint Booth	Binks Downdraft	EP19
EU0090	Binks Paint Booth	Binks Downdraft	EP20
EU0100	Binks Paint Booth	Binks End to End Draft	EP24
EU0110	Topcoat Booth	Spray Equipment, RFDD1414-3	EP43
EU0120	Wash Primer Booth	Spray Equipment, RFDD1414-1	EP45
EU0130	Primer Booth	Spray Equipment, RFDD1414-2	EP46

**PERMIT CONDITION (EU0010 through EU0130)-001**  
**10 CSR 10-6.220**  
**Restriction of Emission of Visible Air Contaminants**

**Emission Limitation:**

1. 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%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

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

**Record Keeping:**

1. The permittee shall maintain records of all observation results (see Attachment B), 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 C)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment D)
4. Attachments B, C and D contain logs including these record keeping 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 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, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

**PERMIT CONDITION EU0020-001**  
**10 CSR 10-6.060**  
**Construction Permits Required**  
**Construction Permit 1088-013A**

**Emission Limitation:**

The permittee shall not emit volatile organic compounds (VOC) from emission unit EU0020 in excess of 40 tons during any calendar year.

**Monitoring:**

The permittee shall monitor monthly solvent use and quantity of solvents recycled. The difference between the quantity of solvent used and the quantity of solvent recycled is assumed to be emitted to the atmosphere.

**Record Keeping:**

1. The permittee shall maintain an accurate record of solvents used, solvents recycled and volatile organic compounds (VOC) emitted into the atmosphere from this unit. Attachment E contains a log to be used for these record keeping requirements. This log, or equivalent created by the permittee, must be used to certify compliance with this requirement.
2. All records shall be kept for a minimum of five (5) years and shall be made available immediately for inspection to the 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 15 days after any exceedance of the emission limitations set forth in the permit condition demonstrated by appropriate record keeping forms.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

<b>EU0140 – SHOT BLAST OPERATION</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>2007 EIQ Reference #</b>
EU0140	Shot Blast Bag Tower P1 (Steel)	Wheel-A-Brator, 4 Wheel	EP01

<p style="text-align: center;"><b>PERMIT CONDITION EU0140-001</b> <b>10 CSR 10-6.220</b> <b>Restriction of Emission of Visible Air Contaminants</b></p>
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**Emission Limitation:**

1. 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%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

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

**Record Keeping:**

- 1. The permittee shall maintain records of all observation results (see Attachment B), 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 C)
- 3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment D)
- 4. Attachments B, C and D contain logs including these record keeping 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 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, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

<b>EU0150 – BURNOFF OVEN</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>2007 EIQ Reference #</b>
EU0150	Pyrolysis Cleaning Furnace	Pollution Control Products/PRC1894174	EP41

<b>PERMIT CONDITION EU0150-001</b> <b>10 CSR 10-6.060</b> <b>Construction Permits Required</b> <b>Construction Permit 0197-027</b>
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**Emission Limitation:**

- 1. The permittee shall not operate the pyrolysis cleaning furnace if the afterburner temperature is below 1500 degrees Fahrenheit and in excess of 1800 degrees Fahrenheit.
- 2. The permittee is prohibited from burning Teflon<sup>TM</sup>, chlorinated plastics, chlorinated solvents, refuse, garbage or trash in the pyrolysis cleaning furnace.

**Monitoring:**

The permittee shall monitor the temperature in the afterburner of the pyrolysis cleaning furnace.

**Record Keeping:**

1. The permittee shall maintain records of the temperature in the afterburner of the pyrolysis cleaning furnace.
2. Attachment F contains a log to be used for these record keeping requirements. This log, or equivalent created by the permittee, must be used to certify compliance with this requirement.
3. All records shall be kept for a minimum of five (5) years and shall be made available immediately for inspection to the 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 15 days after any exceedance of the emission limitations set forth in the permit condition demonstrated by appropriate record keeping forms.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

<b>EU0160 – FACILITY-WIDE WELDING OPERATIONS</b>			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0160	Welding (GMAW, SAW, GTAW)	Not Applicable	EP35

<b>PERMIT CONDITION EU0160-001</b> <b>10 CSR 10-6.220</b> <b>Restriction of Emission of Visible Air Contaminants</b>
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**Emission Limitation:**

1. 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%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

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

**Record Keeping:**

- 1. The permittee shall maintain records of all observation results (see Attachment B), 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 C)
- 3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment D)
- 4. Attachments B, C and D contain logs including these record keeping 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 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, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

<b>EU0240– INTERNAL COMBUSTION ENGINE TESTING</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>2007 EIQ Reference #</b>
EU0240	Internal Combustion Engine Testing	Caterpillar 3456 (two per unit)	EP49

<b>PERMIT CONDITION EU0240-001</b> <b>10 CSR 10-6.260</b> <b>Restriction of Emission of Sulfur Compounds</b>
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**Emission Limitation:**

- 1. Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2. Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.
- 3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ))	Annual arithmetic mean
	0.14 ppm (365 $\mu\text{g}/\text{m}^3$ )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu\text{g}/\text{m}^3$ )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 $\mu\text{g}/\text{m}^3$ )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu\text{g}/\text{m}^3$ )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 $\mu\text{g}/\text{m}^3$	24-hour average not to be exceeded more than once in any 90 consecutive days

**Operational Limitation/Equipment Specifications:**

The emission unit shall be limited to burning No. 2 Fuel Oil or jet fuel (JP-6).

**Monitoring/Recordkeeping:**

1. The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**PERMIT CONDITION EU0240-002**  
**10 CSR 10-6.060**  
**Construction Permits Required**  
**Construction Permit 042009-007**

**Emission Limitation:**

DRS Sustainment Systems, Inc. (DRS Sustainment Systems) shall emit less than 40.0 tons of Nitrogen Oxides (NO<sub>x</sub>) from diesel engine testing operations (EP-49).

**Monitoring/Record Keeping:**

Attachment G, or equivalent forms approved by the Air Pollution Control Program, shall be used to demonstrate compliance with the emission limitation above. DRS Sustainment Systems shall maintain all records required by this permit for not less than five (5) years and shall make them available

immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all surface coating materials.

**Reporting:**

DRS Sustainment Systems 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 the records indicate that the source exceeds the limitations listed above.

## IV. Core Permit Requirements

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

### **10 CSR 10-6.045 Open Burning Requirements**

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  1. Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises;
  2. 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) DRS Sustainment Systems 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 DRS Sustainment Systems Inc. fails to comply with the provisions or any condition of the open burning permit.
  1. 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 Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

### **10 CSR 10-6.060 Construction Permits Required**

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

### **10 CSR 10-6.065 Operating Permits**

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

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

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) 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.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

### **10 CSR 10-6.150 Circumvention**

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

**10 CSR 10-6.170**

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

**Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

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

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

**10 CSR 10-3.090 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 record keeping 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*

<b>10 CSR 10-6.280 Compliance Monitoring Usage</b>
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- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

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

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

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

### **10 CSR 10-6.065(6)(C)1.C General 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, 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. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's 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)**

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

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

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

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

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

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

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable

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

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), 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'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, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

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

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

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

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

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

This permit may be reopened for cause if:

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

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

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

## **VI. Attachments**

Attachments follow.







**Attachment D**

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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







## STATEMENT OF BASIS

### Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received May 1, 2007;
- 2) 2007 Emissions Inventory Questionnaire, received May 27, 2008; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

### 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.

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

During the permit review, it was determined that 40 CFR Part 63 Subpart M – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products may be applicable to this facility. On December 4, 2008, the facility was notified by the review engineer of this possibility and a request was made for additional information to determine applicability. On July 7, 2009, the facility sent information to the review engineer indicating that the Subpart M regulation did apply to the facility based on PTE calculations. On July 2, 2009, a letter of self-disclosure of late initial notification and subsequent compliance reports was sent to the Enforcement Section of the Air Pollution Control Program.

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

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

#### 10 CSR 10-6.100, *Alternate Emission Limits*

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

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

All units potentially subject to this rule are combustion units less than ten (10) million British thermal units (BTUs) fired exclusively by natural gas. The Air Pollution Control Program has determined that units less than 10 MMBTU burning only natural gas will never exceed the limits set forth in the rule.

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

This rule was recently updated to exempt coating operations equipped with a control device with at least 95% control efficiency, provided the system is operated and maintained in accordance with manufacturer's specifications. Therefore, this rule was not applied to the paint booths at this facility.

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

This rule also exempts emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter. According to the following calculations, Emission Unit EU0140 has the potential to emit 0.35 pounds of particulate matter per hour (lb PM/hr) and Emission Unit EU0160 has the potential to emit 0.35 lb PM/hr, therefore they are not subject to this rule.

##### EU0140

MHDR = 28.5 ton/hr

Emission Factor = 0.01242 lb/ton

Potential Emissions (lb/hr) =  $28.5 \times 0.01242 = 0.35 < 0.5$  lb/hr

##### EU0160

MHDR = 0.0335 ton/hr

Emission Factor = 10.4 lb/ton

Potential Emissions (lb/hr) =  $0.335 \times 10.4 = 0.35 < 0.5$  lb/hr

### **Construction Permit Revisions**

Three construction permits exist that contain conditions that were incorporated into the operating permit. They are Construction Permit 0197-027, 1088-013A, and 042009-007.

Brief summaries of construction permits issued to this installation are listed below. Any conditions incorporated into the operating permit and any revisions made to the construction permits for this installation are listed in the summary below.

1. Construction Permit 0787-006 was issued for the construction of an incinerator. However, the incinerator was never installed and therefore the conditions from this permit have not been included in the operating permit. If the permittee decides to construct a plant incinerator in the future, a new construction permit application would need to be submitted.
2. Construction Permit 1088-013A was issued for the construction of three paint spray booths. Two of the three booths have since been removed from operation. The operating permit specifically limits the VOC emissions from the remaining emission unit (EU0020) to the 40 ton per year limit established in the construction permit. Records showing the quantities of solvent used and recycled each month as described in the construction permit have been incorporated into this operating permit.
3. Construction Permit 0990-005 was issued for the construction of five dry paint booths, four steam boilers and two drying ovens. One of the paint booths was never constructed. The four steam boilers were determined to be exempt from regulation (insignificant sources) because they are indirect heating sources with a heat input of less than 1.0 MMbtu/hr. There were no special conditions included in this permit and the permit has only been mentioned here for clarification purposes

4. Construction Permit 0395-014 was issued for the conversion of a spray wash booth to a closed abrasive blast booth. This abrasive blast booth has since been removed from service and therefore the conditions from this permit have not been included in the operating permit.
5. Construction Permit 0896-001 was issued for the construction of a dust removal system to a plasma arc cutting operation. The plasma arc cutting operation has since been removed from service and therefore the conditions from this permit have not been included in the operating permit.
6. Construction Permit 0197-027 was issued for the construction of a controlled pyrolysis cleaning furnace with afterburner. Special conditions with respect to the operating temperature of the afterburner and a condition prohibiting the types of materials to be burned have been incorporated into this operating permit. Additionally, the special condition regarding nuisance odors was located in the core permit requirements of the operating permit.
7. Construction Permit 1198-016 was issued for the construction of one cleaning tank, three paint booths, two infrared ovens and one convection oven. There were no special conditions included in this permit and this permit has been mentioned only for completeness.
8. Permit number 042009-007 has been issued for a diesel engine testing process. The permittee manufactures mobile power generation systems for military applications. The new and re-conditioned engines that are mounted to the trailers at the facility are not manufactured by the permittee but are tested for up to 25 hours by the permittee prior to shipment to the customer. The engines can use diesel fuel or jet fuel (JP-8) at a maximum fuel consumption of 30 gallons per hour per engine. The following regulations are listed as applicable requirements in the construction permit, but have been determined to be not applicable.

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

This regulation is not applicable to internal combustion engines operated outside of the Kansas City or St. Louis metropolitan areas.

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

This regulation is not applicable because the definition of process weight excludes liquid fuels.

10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

This regulation is not applicable because internal combustion engines are not considered indirect heating.

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

Subparts K, Ka and Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)*

EU0210 and EU0220 represent eleven (11) above ground storage tanks each with a storage capacity of between 500 and 3400 gallons storing gasoline, kerosene or diesel fuel. The tanks are not subject to any NSPS subpart due to the small size of the tanks. Both Subparts K and Ka apply to tanks greater than 40,000 gallons. Subpart Kb applies to tanks greater than 40 cubic meters (m<sup>3</sup>) which is approximately equal to 10,561 gallons.

Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This regulation is not applicable because it does not apply to engine testing or mobile units.

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

Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

It was determined that this regulation does apply to this facility.

Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This regulation is not applicable because it does not apply to engine testing or mobile units.

**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**

10 CSR 10-6.065(3)(D), *Operating Permits*

EU0170, EU0180, EU0190, EU0200 and EU0230 are all combustion units of varying size. All of these combustion units emit only combustion products, produce less than one hundred fifty (150) pounds per day of any air contaminant and have a maximum rated capacity of less than ten (10) million British thermal units (BTUs) per hour heat input by using exclusively natural gas. The Air Pollution Control Program has determined that units such as these are not necessary to include in the operating permit.

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

It was determined that the installation was not required to develop and maintain a Risk Management Plan (RMP) under 112(r) and therefore the requirements for a RMP have not been included in this permit.

**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:

---

Jill Wade, P.E.  
Environmental Engineer

CERTIFIED MAIL: 70073020000315697343  
RETURN RECEIPT REQUESTED

Mr. Eddie Kimes  
DRS Sustainment Systems Inc.  
#1 McDaniel Street  
West Plains, MO 65775

Re: DRS Sustainment Systems Inc., 091-0011  
Permit Number: **OP2010-032**

Dear Mr. Kimes:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Jill Wade at the Departments' 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:jwk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII  
Southeast Regional Office  
PAMS File: 2007-05-029