



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **022016-003** Project Number: 2015-09-056
Installation Number: 091-0011

Parent Company: DRS Sustainment Systems, Inc.

Parent Company Address: 201 Evans Lake, St. Louis, MO 63121

Installation Name: DRS Sustainment Systems, Inc. West Plains

Installation Address: #1 McDaniel Street, West Plains, MO 65775

Location Information: Howell County, S20, T24N, R8W

Application for Authority to Construct was made for:
Abrasive Blasting. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Chad Stephenson

Prepared by
Chad Stephenson
New Source Review Unit

Kyra L. Moore

Director or Designee
Department of Natural Resources

FEB - 5 2016

Effective Date

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources' regional office responsible for the area within which you are located within 15 days after the actual start up of these air contaminant sources.

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions 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 30 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

DRS Sustainment Systems, Inc. West Plains
Howell County, S20, T24N, R8W

1. Control Device Requirement- Dust Collector
 - A. DRS Sustainment Systems, Inc. West Plains shall control emissions from the abrasive blasting process (EP-51) using a dust collector as specified in the permit application.
 - B. The dust collector shall be operated and maintained in accordance with the manufacturer's specifications. The dust collector shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them.
 - C. Replacement cartridges for the dust collector shall be kept on hand at all times. The cartridges shall be made of materials appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. DRS Sustainment Systems, Inc. West Plains shall monitor and record the operating pressure drop across the dust collector at least once every 24 hours when in operation. The operating pressure drop shall be maintained within the design conditions specified by the filter manufacturer's performance warranty.
 - E. DRS Sustainment Systems, Inc. West Plains shall maintain a copy of the dust collector manufacturer's performance warranty on site.
 - F. DRS Sustainment Systems, Inc. West Plains shall maintain an operating and maintenance log for the dust collector which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

2. Capture Device Requirement – Abrasive Blasting Enclosure (EP-51)
 - A. DRS Sustainment Systems, Inc. West Plains shall use abrasive blasting enclosures to capture emissions from the abrasive blasting activities. Emissions from the blasting enclosures shall be routed through the dust collector as stated in Special Condition 1.
 - B. DRS Sustainment Systems, Inc. West Plains shall design and construct each abrasive blasting enclosure according to the Occupational Safety and Health Administration (OSHA) requirements, 29 CFR 1910.94(a)(3) *Blast-cleaning enclosures*.
 - C. DRS Sustainment Systems, Inc. West Plains shall demonstrate that each abrasive blasting enclosure was constructed according to Special Condition 2.B. by keeping a record of the following design parameters:
 - 1) the minimum recommended face velocity
 - 2) engineering drawings which demonstrate that the enclosure was designed to meet the minimum face velocity
 - D. DRS Sustainment Systems, Inc. West Plains shall verify the proper operation of each abrasive blasting enclosure by checking the face velocity of the enclosure every 24 hours of operation.
3. Abrasive Blasting of Alternative Coating Materials
 - A. When considering blasting alternative parts that are coated with a material that contains particulate HAPs in the abrasive blasting process (EP-51) that are different than the materials listed in the Application for Authority to Construct, DRS Sustainment Systems, Inc. West Plains shall calculate the potential emissions of all individual particulate HAPs in the alternative material.
 - B. DRS Sustainment Systems, Inc. West Plains shall seek approval from the Air Pollution Control Program before blasting the alternative material if the potential individual particulate HAP emissions of blasting the alternative material are equal to or greater than the screening model action level (SMAL) for any chemical listed in Appendix B
4. Record Keeping and Reporting Requirements
 - A. DRS Sustainment Systems, Inc. West Plains shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- B. DRS Sustainment Systems, Inc. West Plains shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2015-09-056
Installation ID Number: 091-0011
Permit Number:

Installation Address:

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

Parent Company:

DRS Sustainment Systems, Inc.
201 Evans Lake
St. Louis, MO 63121

Howell County, S20, T24N, R8W

REVIEW SUMMARY

- DRS Sustainment Systems, Inc. West Plains has applied for authority to construct abrasive blasting processes consisting of two blast booths and two glove-box type units.
- The application was deemed complete on October 2, 2015.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are Chromium VI compounds from the paint that is being blasted off the metal parts.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- Blast enclosures with fabric filters are being used to control the particulate matter emissions from the equipment in this permit
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are conditioned below de minimis levels.
- This installation is located in Howell County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- A Part 70 Operating Permit application is required for this installation within one year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

DRS Sustaining Systems (DRS) is a manufacturing installation with four core product areas: electronic systems; battlefield systems; fuel and water systems; and mobility and armor systems. They are located at #1 McDaniel Street, West Plains, MO 65775, in Howell County. The processes at the approximately 100 acre installation include thirteen paint booths, shot blasting, welding and engine testing. The installation operates in accordance with Operating Permit OP2010-032, a Part 70 permit, which was effective on April 14, 2010, and expired on April 14, 2015. The installation has submitted for a Part 70 operating permit renewal under project # 2014-09-053. An update to the application will be required to include the equipment of this project. The installation has an equipment limit imposed in Permit 1088-013A on EU 0020 (solvent usage from Brinks paint spray operation) of 40 tons of VOC and a limit of less than 250 tons installation wide for VOC in Permit 042009-007. The 40 ton VOC limit in Permit 1088-013A is not added to the 250 ton limit, but included under the 250 ton installation wide limit. It has a NO_x limit of 40 tons applied in Permit 042009-007 for EP-49 diesel engine testing. The source has a MACT applied Title 40 Part 63 Subpart M, *National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* and is considered a major source for HAPs. It is a minor source for all other pollutants.

The parent company, DRS Technologies, headquartered in Parsippany, New Jersey, is a leading supplier of integrated products, services and support to military forces, intelligence agencies and prime contractors worldwide. Focused on defense technology, the company develops, manufactures and supports a broad range of systems for mission critical and military requirements, as well as homeland security.

The following permits have been issued to DRS-Sustainment Systems Inc. from the Air Pollution Control Program. This installation name was changed several times. It was Esco Electronics Corp. and then was changed to Systems & Electronics Incorporated and then became DRS.

Table 1: Permit History

Permit Number	Description
0787-006	Incinerator
1088-013	Paint spray operation
0990-005	Three paint booths and a natural gas boiler
0395-014	Abrasive blast booth
0896-001	Install a dust filter for plasma arc cutter
0197-027	Pyrolysis cleaning oven with afterburner
OP2002-033	Part 70 Operating Permit
1088-013A	Amendment
1198-016	Replace painting and cleaning system
OP2010-032	Part 70 Operating Permit
042009-007	Diesel Engine Testing
012011-005	Equipment Testing

PROJECT DESCRIPTION

DRS Sustainment Systems, Inc West Plains operates a manufacturing facility whose principal product is truck trailers for the military. Current processes at the facility include blasting, welding, painting, drying, and engine testing. Multiple buildings at the facility house these different processes. DRS designates each building at their facility by assigning it a plant number. DRS is adding a new building that is referred to as Plant 10. The Plant 10 building is being constructed between Plants 1 and 3. DRS intends to add Abrasive Blasting Processes (EP-51) to Plant 10. These processes will include two blast booths and two glove-box type units. One blast booth will use steel grit and the other will use aluminum oxide as the blast media. The two glove-box units will use plastic beads as the blast media. The abrasive blast booths and units that will be installed in Plant 10 will be used to remove paint and primer from various metal parts from military vehicles. Emissions from both blast booths and both glove-box type units are controlled using dust collectors with filters. The blast booths are completely enclosed. The glove box units are also completely enclosed; however they are not located inside a booth.

Pollutants expected from the abrasive blasting will be PM, PM₁₀, PM_{2.5}, and hexavalent chromium. The blast booths and glove-box units will primarily remove paint systems from military equipment, specifically the Tunner and Halverson. The pre-treatment and primer layers on this equipment contain chromium compounds. The total amount of chromium in the pre-treatment and primer layers is being conservatively assumed to be all Chromium VI even though it is likely a mixture of Chromium VI and Chromium III. Additionally, Hexamethylene Diisocyanate, Xylene, Ethyl Benzene, Toluene, and Methyl Isobutyl Ketone are also ingredients in the topcoat that is being removed from the metal parts; however they are not particulate matter HAPs and were not calculated for the blasting operation.

The maximum hourly design rate (MHDR) of 21.13 pounds per hour of blast media usage was calculated using historical usages for the blast media at the facility. EU-0140 is the shot blast operation that currently exists at the facility. The maximum usage from the past five years was used and then scaled from the current operating hours of the abrasive blasting to 8,760 hours. DRS Sustainment Systems, Inc chose to use a 20 percent safety factor to apply to the MHDR.

EMISSIONS/CONTROLS EVALUATION

Potential emissions from the abrasive blasting processes (EP-51) were estimated using the emission factors and control efficiencies obtained from EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 13.2.6 Abrasive Blasting, 10/97. The controlled PM emission factor was used to account for the use of a fabric filter. The particle size distribution of the particulate emissions was determined using the California Emission Inventory Development and Reporting System (CEIDARS) Appendix A: Table A – Abrasive Blasting.

The potential emissions of hexavalent chromium from abrasive blasting is based on blasting a coating consisting of 36.19% MIL-PRF-23377J – 2 – Component Epoxy primer, 8.94 % DOD-P-15328D – 2 Component Wash Primer and 54.87 % MIL-PRF-85284C – 2 Component Topcoat. Chromium is in both the MIL_PRF-23377J and DOD-P-15328D primers. The total amount of chromium in the coating has been assumed to be all hexavalent chromium. The amount of chromium in the coating was determined based off the material safety data sheets provided with the application.

The following table provides an emissions summary for this project. Existing potential emissions were taken from permit numbers 042009-007 and 012011-005. Existing actual emissions were taken from the installation's 2014 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2014 EIQ)	Potential Emissions of the Application
PM	25.0	N/D	N/D	0.064
PM ₁₀	15.0	11.18	0.34	0.055
PM _{2.5}	10.0	3.49	0.33	0.050
SO _x	40.0	<40.0	0.18	N/A
NO _x	40.0	<40.0	4.92	N/A
VOC	40.0	<250.0	12.01	N/A
CO	100.0	35.42	1.86	N/A
HAPs	10.0/25.0	N/D	1.15	0.00096
Chromium VI	¹ 0.002	N/D	N/D	0.00096

N/A = Not Applicable; N/D = Not Determined

¹SMAL = Screening Model Action Level

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

DRS Sustainment Systems, Inc. West Plains shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

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

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 23, 2015, received September 23, 2015, designating DRS Sustainment Systems, Inc. as the owner and operator of the installation.
- Email from Gayle Lee of Midwest Environmental Consultants, received November 9, 2015, containing updated potential to emit calculations and material safety data sheets.

APPENDIX A

Abbreviations and Acronyms

%	percent	m/s	meters per second
°F	degrees Fahrenheit	Mgal	1,000 gallons
acfm	actual cubic feet per minute	MW	megawatt
BACT	Best Available Control Technology	MHDR	maximum hourly design rate
BMPs	Best Management Practices	MMBtu	Million British thermal units
Btu	British thermal unit	MMCF	million cubic feet
CAM	Compliance Assurance Monitoring	MSDS	Material Safety Data Sheet
CAS	Chemical Abstracts Service	NAAQS ...	National Ambient Air Quality Standards
CEMS	Continuous Emission Monitor System	NESHAPs	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	NO_x	nitrogen oxides
CO	carbon monoxide	NSPS	New Source Performance Standards
CO₂	carbon dioxide	NSR	New Source Review
CO_{2e}	carbon dioxide equivalent	PM	particulate matter
COMS	Continuous Opacity Monitoring System	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
CSR	Code of State Regulations	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter
dscf	dry standard cubic feet	ppm	parts per million
EQ	Emission Inventory Questionnaire	PSD	Prevention of Significant Deterioration
EP	Emission Point	PTE	potential to emit
EPA	Environmental Protection Agency	RACT	Reasonable Available Control Technology
EU	Emission Unit	RAL	Risk Assessment Level
fps	feet per second	SCC	Source Classification Code
ft	feet	scfm	standard cubic feet per minute
GACT	Generally Available Control Technology	SDS	Safety Data Sheet
GHG	Greenhouse Gas	SIC	Standard Industrial Classification
gpm	gallons per minute	SIP	State Implementation Plan
gr	grains	SMAL	Screening Model Action Levels
GWP	Global Warming Potential	SO_x	sulfur oxides
HAP	Hazardous Air Pollutant	SO₂	sulfur dioxide
hr	hour	tph	tons per hour
hp	horsepower	tpy	tons per year
lb	pound	VMT	vehicle miles traveled
lbs/hr	pounds per hour	VOC	Volatile Organic Compound
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		

APPENDIX B: Table of Hazardous Air Pollutants and Screening Model Action Levels (May 3, 2012 Revision 10)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CARBARYL	63-25-2	10	V	Y	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
ACETOPHENONE	98-86-2	1		Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CATECHOL	120-80-9	5		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
ACROLEIN	107-02-8	0.04		Y	N	CHLORAMBEN	133-90-4	1		Y	Y	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
ACRYLAMIDE	79-06-1	0.02		Y	N	CHLORDANE	57-74-9	0.01		Y	Y	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
ACRYLIC ACID	79-10-7	0.6		Y	N	CHLORINE	7782-50-5	0.1		N	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
ACRYLONITRILE	107-13-1	0.3		Y	N	CHLOROACETIC ACID	79-11-8	0.1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
AMINOBIHENYL, [4-]	92-67-1	1	V	Y	N	CHLOROBENZENE	108-90-7	10		Y	N	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
ANILINE	62-53-3	1		Y	N	CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	DIMETHYL PHTHALATE	131-11-3	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLOROFORM	67-66-3	0.9		Y	N	DIMETHYL SULFATE	77-78-1	0.1		Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
ANTIMONY COMPOUNDS		5	H	N	Y	CHLOROPRENE	126-99-8	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHROMIUM COMPOUNDS		5	L	N	Y	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	CHRYSENE	218-01-9	0.01	V	Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	COBALT COMPOUNDS		0.1	M	N	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
ASBESTOS	1332-21-4	0	A	N	Y	CRESOL, [META-]	108-39-4	1	B	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
BENZENE	71-43-2	2		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
BENZIDINE	92-87-5	0.0003	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CUMENE	98-82-8	10		Y	N	ETHYL ACRYLATE	140-88-5	1		Y	N
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N	ETHYL BENZENE	100-41-4	10		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y	ETHYL CHLORIDE	75-00-3	10		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N	ETHYLENE GLYCOL	107-21-1	10		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2				
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DIAZOMETHANE	334-88-3	1		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N
BERYLLIUM SALTS		2E-05	J	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DIOXINS/FURANS		6E-07	D,V	Y	N	ETHYLENE OXIDE	75-21-8	0.1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DIBENZOFURAN	132-64-9	5	V	Y	N	ETHYLENE THIOUREA	96-45-7	0.6		Y	Y
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	FORMALDEHYDE	50-00-0	2		Y	N
BROMOFORM	75-25-2	10		Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y	GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	HEPTACHLOR	76-44-8	0.02		Y	N
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y	HEXACHLOROBENZENE	118-74-1	0.01		Y	N
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N	HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N
CAPROLACTAM (Delisted)	105-60-2					DICHLOROMETHANE	75-09-2	10		N	N	HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N
CAPTAN	133-06-2	10		Y	Y	DICHLOROPHOENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N

APPENDIX B: Table of Hazardous Air Pollutants and Screening Model Action Levels (May 3, 2012 Revision 10)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5			Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8			Y	N
HEXAMETHYLENE,-1,6-DIISOCYANATE	822-06-0	0.02		Y	N	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N	VINYL ACETATE	108-05-4	1			Y	N
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6			Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PARATHION	56-38-2	0.1		Y	Y	VINYL CHLORIDE	75-01-4	0.2			Y	N
HYDRAZINE	302-01-2	0.004		N	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y	XYLENE, [META-]	108-38-3	10	G		Y	N
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N	XYLENE, [ORTHO-]	95-47-6	10	G		Y	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N	XYLENE, [PARA-]	106-42-3	10	G		Y	N
HYDROQUINONE	123-31-9	1		Y	N	PHENOL	108-95-2	0.1		Y	N	XYLENES (MIXED ISOMERS)	1330-20-7	10	G		Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N							
ISOPHORONE	78-59-1	10		Y	N	PHOSGENE	75-44-5	0.1		Y	N							
LEAD COMPOUNDS		0.01	Q	N	Y	PHOSPHINE	7803-51-2	5		N	N							
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N	Legend						
MALEIC ANHYDRIDE	108-31-6	1		Y	N	PHTHALIC ANHYDRIDE	85-44-9	5		Y	N	Group ID	Aggregate Group Name					
MANGANESE COMPOUNDS		0.8	R	N	Y	POLYCYLIC ORGANIC MATTER		0.01	V	Y	N	A	Asbestos					
MERCURY COMPOUNDS		0.01	S	N	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y	B	Cresols/Cresylic Acid (isomers and mixtures)					
METHANOL	67-56-1	10		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N	C	2,4 - D, Salts and Esters					
METHOXYCHLOR	72-43-5	10	V	Y	Y	PROPIONALDEHYDE	123-38-6	5		Y	N	D	Dibenzofurans, Dibenzodioxins					
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y	E	4, 6 Dinitro-o-cresol, and Salts					
METHYL CHLORIDE	74-87-3	10		Y	N	PROPYLENE OXIDE	75-56-9	5		Y	N	F	Lindane (all isomers)					
METHYL ETHYL KETONE (Delisted)	78-93-3					PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N	G	Xylenes (all isomers and mixtures)					
METHYL HYDRAZINE	60-34-4	0.06		Y	N	QUINOLINE	91-22-5	0.006		Y	N	H	Antimony Compounds					
METHYL IODIDE	74-88-4	1		Y	N	QUINONE	106-51-4	5		Y	N	I	Arsenic Compounds					
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y	J	Beryllium Compounds					
METHYL ISOCYANATE	624-83-9	0.1		Y	N	SELENIUM COMPOUNDS		0.1	W	N	Y	K	Cadmium Compounds					
METHYL METHACRYLATE	80-62-6	10		Y	N	STYRENE	100-42-5	1		Y	N	L	Chromium Compounds					
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	STYRENE OXIDE	96-09-3	1		Y	N	M	Cobalt Compounds					
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN [2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y	N	Coke Oven Emissions					
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N	O	Cyanide Compounds					
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N	P	Glycol Ethers					
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N	Q	Lead Compounds (except elemental Lead)					
MINERAL FIBERS		0	T	N	Y	TOLUENE	108-88-3	10		Y	N	R	Manganese Compounds					
NAPHTHALENE	91-20-3	10	V	Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N	S	Mercury Compounds					
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N	T	Fine Mineral Fibers					
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	TOXAPHENE	8001-35-2	0.01		Y	N	U	Nickel Compounds					
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	TRICHLOROEBENZENE, [1,2,4-]	120-82-1	10		Y	N	V	Polycyclic Organic Matter					
NICKEL COMPOUNDS		1	U	N	Y	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N	W	Selenium Compounds					
NICKEL REFINERY DUST		0.08	U	N	Y	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N	X	Polychlorinated Biphenyls (Aroclors)					
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y	TRICHLOROETHYLENE	79-01-6	10		Y	N	Y	Radionuclides					
NITROBENZENE	98-95-3	1		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N							
NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N							
NITROPHENOL, [4-]	100-02-7	5		Y	N	TRIETHYLAMINE	121-44-8	10		Y	N	Note 1	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million					
NITROPROPANE, [2-]	79-46-9	1		Y	N	TRIFLURALIN	1582-09-8	9		Y	Y							

Ms. Tammy Hampton
Environmental Specialist
DRS Sustainment Systems, Inc. West Plains
#1 McDaniel Street, PO Box 196
West Plains, MO 65775

RE: New Source Review Permit - Project Number: 2015-09-056

Dear Ms. Hampton:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 Administrative Hearing Commission, Truman State Office Building, P.O. Box 1557, Jefferson City, Missouri 65102, www.oa.mo.gov/ahc. If you have any questions regarding this permit, please do not hesitate to contact Chad Stephenson, at the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:csl

Enclosures

c: Southeast Regional Office
PAMS File: 2015-09-056
Permit Number: