



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: OP2016-034

Expiration Date: OCT 04 2021

Installation ID: 159-0056

Project Number: 2015-12-041

Installation Name and Address

Edwards Fiberglass, Inc.
1415 East Boonville
Sedalia, MO 65302
Pettis County

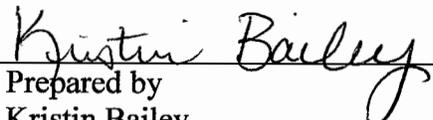
Parent Company's Name and Address

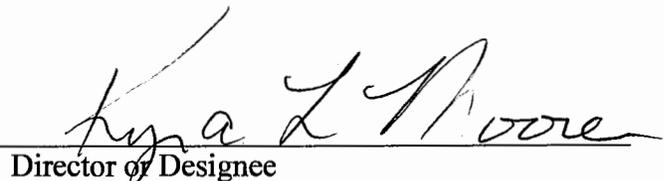
Edwards Fiberglass, Inc.
P.O. Box 1252
Sedalia, MO 65032

Installation Description:

Edwards Fiberglass, Inc. manufactures a wide range of custom tank designs in various sizes for businesses, industries, and personal use worldwide for the storage of water, chemicals, food products, pharmaceuticals, specialized processes, and government projects in Sedalia, Missouri. The tanks are formed within open molds using filament winding on mandrels, mechanical chopper spray guns, and manual lay-up techniques. The installation is a major source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

This is a renewal of the Part 70 Operating Permit.


Prepared by
Kristin Bailey
Operating Permit Unit


Director of Designee
Department of Natural Resources

OCT 04 2016

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EP-01	Filament Winding with Resin Process
EP-02	Mechanical Spray with Resin Process
EP-03	Manual Application with Resin Process
EP-04	Gel Coat Mechanical Spray Process
EP-05	Cleaning Tools

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

None

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations and
40 CFR Part 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants:
Reinforced Plastic Composites Production

Applicability:

- 1) The affected source consists of all parts of the facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts the permittee also manufactures. [§63.5790(b)]
- 2) The following operations are specifically excluded from any requirements in 40 CFR Part 63, Subpart WWWW: application of mold sealing and release agents; mold stripping and cleaning; repair of parts that the permittee did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of

putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply. [§63.5790(c)]

Open Molding Organic HAP Emission Factors:

Emissions factors are used in 40 CFR Part 63, Subpart WWWW to determine compliance with certain organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW. The permittee may use the equations in Table 1 of 40 CFR Part 63, Subpart WWWW to calculate emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, the permittee can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. The permittee may also use the organic HAP emissions factors calculated using the equations in Table 1 of 40 CFR Part 63, Subpart WWWW, combined with resin and gel coat use data, to calculate the organic HAP emissions. [§63.5796]

Table 1 — Equations To Calculate Organic HAP Emissions Factors for Specific Open Molding Process Streams

Operation	Type of Coating Application	Process Description	Organic HAP Emission Factor Equation (lb/ton resin/gel coat applied) ^{1,2}	
			Materials Containing < 33% HAPs	Materials Containing ≥ 33% HAPs
Open Molding	Manual resin application	Nonvapor-suppressed resin	$EF = 0.126 \times \%HAP \times 2000$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000$
		Vapor-suppressed resin	$EF = 0.126 \times \%HAP \times 2000 \times (1 - (0.5 \times VSE \text{ factor}))$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times (1 - (0.5 \times VSE \text{ factor}))$
	Atomized mechanical resin application	Nonvapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000$
		Vapor-suppressed resin	$EF = 0.169 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$
	Nonatomized mechanical resin application	Nonvapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000$
		Vapor-suppressed resin	$EF = 0.107 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$
	Filament application ³	Nonvapor-suppressed resin	$EF = 0.184 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000$
		Vapor-suppressed resin	$EF = 0.12 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000 \times 0.65$
	Atomized spray gel coat application	Nonvapor-suppressed gel coat	$EF = 0.445 \times \%HAP \times 2000$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000$
	Nonatomized spray gel coat application		$EF = 0.185 \times \%HAP \times 2000$	$EF = ((0.4506 \times \%HAP) - 0.0505) \times 2000$
	Atomized spray gel coat application using robotic or automated spray		$EF = 0.445 \times \%HAP \times 2000 \times 0.73$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000 \times 0.73$

¹Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

²The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of Appendix A to this subpart.

³Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

Table 3 — Organic HAP Emissions Limits for Open Molding Sources

As specified in §63.5805, the permittee shall meet the following organic HAP emissions limits:

Operation	Type of Coating Application	Organic HAP emissions limit (lb/ton) ¹
Open molding — corrosion-resistant and/or high strength (CR/HS)	Mechanical resin application	113
	Filament application	171
	Manual resin application	123
Open molding — non-CR/HS	Mechanical resin application	88
	Filament application	188
	Manual resin application	87
Open molding — low-flame spread/low-smoke products	Mechanical resin application	497
	Filament application	270
	Manual resin application	238
Open molding — gel coat ²	Tooling gel coating	440
	White/off white pigmented gel coating	267
	All other pigmented gel coating	377
	CR/HS or high performance gel coat	605
	Fire retardant gel coat	854
	Clear production gel coat	522

¹The permittee shall be at or below these values based on a 12-month rolling average.

²If the permittee only applies gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If the permittee uses multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the permittee may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

Organic HAP Content:

- 1) In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c), as applicable. [§63.5797]
 - a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
 - b) If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance.
 - c) If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may still use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee must use the measured organic HAP content to determine compliance. [§63.5797(c)]

Standards:

- 1) The permittee shall meet the following requirements (The permittee may elect to comply using any options to meet the standards described in §63.5810. [§63.5805]
 - a) The permittee shall meet the organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW and the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW that apply, regardless of the quantity of HAP emitted. [§63.5805(b)]
 - b) If the permittee performs repair operations subject to 40 CFR Part 63, Subpart WWWW as defined in §63.5935, these repair operations must meet the requirements in Tables 3 and 4 of 40 CFR Part 63, Subpart WWWW . [§63.5805(g)]

Table 4 — Work Practice Standards

As specified in §63.5805, the permittee shall meet the work practice standards in the following table:

Operation	Work Practice Standards
Cleaning	The permittee shall not use cleaning solvents that contain HAP, except organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
HAP-containing materials storage	The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.

Open Molding Compliance Options:

- 1) The permittee shall use one of the methods in §63.5810 to meet the standards for open molding or centrifugal casting operations in Table 3 of 40 CFR Part 63, Subpart WWWW. [§63.5810]. The facility has chosen to utilize the weighted average emission limit option.

- a) *Demonstrate compliance with a weighted average emission limit.* The permittee shall demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW that apply. When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations. [§63.5810(c)]
- i) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emissions limit. To do this, multiply the individual organic HAP emissions limits in Table 3 of 40 CFR Part 63, Subpart WWWW for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 3.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (\text{EL}_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad \text{Equation No. 3}$$

Where:

EL_i = organic HAP emissions limit for operation type i , lbs/ton from Table 3 of 40 CFR Part 63, Subpart WWWW;

Material_i = neat resin plus or neat gel coat plus used during the last 12 month period for operation type i , tons;

n = number of operations. [§63.5810(c)(1)]

- ii) Each month the permittee shall calculate the weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors calculated in paragraph (b)(1) and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4.

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation EF}_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad \text{Equation No. 4}$$

Where:

Actual Individual EF_i = Actual organic HAP emissions limit for operation type i , lbs/ton from Table 3 of 40 CFR Part 63, Subpart WWWW;

Material_i = neat resin plus or neat gel coat plus used during the last 12 month period for operation type i , tons;

n = number of operations. [§63.5810(c)(2)]

- iii) Compare the values calculated in paragraphs (c)(1) and (2). If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the permittee is in compliance. [§63.5810(c)(3)]

Table 7 — *Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type*

As specified in §63.5810(d), when electing to use the same resin(s) for multiple resin application methods, the permittee may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

Resin Type	Application Method	Type of Coating Application	Maximum Allowable Percent Organic HAP Content
CR/HS resins	Nonatomized mechanical	Filament application	46.4
		Manual	46.4
	Filament application	Manual	42.0
Non-CR/HS resins	Filament application	Mechanical	45.0 ¹
		Manual	45.0
	Nonatomized mechanical	Manual	38.5

¹Nonatomized mechanical application shall be used.

General Requirements:

- 1) The permittee must be in compliance at all times with the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, as well as the organic HAP emissions limits in Table 3 or the organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW, as applicable, that the permittee is meeting without the use of add-on controls. [§63.5835(a)]
- 2) The permittee must be in compliance with all organic HAP emissions limits in 40 CFR Part 63, Subpart WWWW that the permittee meets using add-on controls, except during periods of startup, shutdown, and malfunction. [§63.5835(b)]
- 3) The permittee must always operate and maintain affected sources, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i). [§63.5835(c)]

Continuous Compliance:

- 1) The permittee shall demonstrate continuous compliance with each standard in §63.5805 that applies according to the following methods: [§63.5900(a)]
 - a) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(2)]
 - b) Compliance with organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW is demonstrated by maintaining an average organic HAP content value less than or equal to the

appropriate organic HAP contents listed in Table 7 of 40 CFR Part 63, Subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW, as discussed in §63.5895(d). [§63.5900(a)(3)]

- c) Compliance with the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW is demonstrated by performing the work practice required for the operation. [§63.5900(a)(4)]
- 2) The permittee must report each deviation from each applicable standard in §63.5805. The deviations must be reported according to the requirements in §63.5910. [§63.5900(b)]
- 3) During periods of startup, shutdown or malfunction, the permittee must meet the applicable organic HAP emissions limits and work practice standards. [§63.5900(c)]
- 4) Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in paragraph (d) are not violations if the permittee demonstrates to the Director's satisfaction that the permittee was operating in accordance with §63.6(e)(1). The Director will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e).

Monitoring/Recordkeeping:

- 1) The permittee shall retain records of resin and gel coat use, organic HAP content, and operation where the resin is used to meet any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 of 40 CFR Part 63, Subpart WWWW. The permittee shall retain records of resin and gel coat use, organic HAP content, and operation where the resin is used to meet any organic HAP content limits in Table 7 of 40 CFR Part 63, Subpart WWWW when averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [§63.5895(c)]
- 2) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, the permittee shall retain the records of resin and gel coat organic HAP content, and the permittee shall include the list of these resins and gel coats and identify their application methods in each semi-annual compliance report. If after having initially demonstrated that a specific combination of an individual resin or gel coat and application method meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the permittee changes the application method, then the permittee shall again demonstrate that the individual resin or gel coat meets its emission limit as specified in Paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 of 40 CFR Part 63, Subpart WWWW, the permittee shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average. [§63.5895(d)]
- 3) The permittee shall retain the following records: [§63.5915(a)]
 - a) A copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.5915(a)(1)]
 - b) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [§63.5915(a)(2)]

- 4) The permittee shall retain all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7n of 40 CFR Part 63, Subpart WWWW. [§63.5915(c)]
- 5) The permittee shall retain a certified statement that the permittee is in compliance with the work practice requirements in Table 4, as applicable. [§63.5915(d)]
- 6) The permittee shall retain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]
- 7) As specified in §63.10(b)(1), the permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]
- 8) The permittee shall retain each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years. [§63.5920(c)]
- 9) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

Notifications:

- 1) The permittee shall submit all of the notifications in Table 13 of 40 CFR Part 63, Subpart WWWW that apply by the dates specified in Table 13 of 40 CFR Part 63, Subpart WWWW. The notifications are described more fully in 40 CFR Part 63, Subpart A, referenced in Table 13 of 40 CFR Part 63, Subpart WWWW. [§63.5905(a)]
- 2) If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the Administrator within 15 calendar days after the change. [§63.5900(b)]

Table 13 — Applicability and Timing of Notifications

As required in §63.5905(a), the permittee shall determine the applicable notifications and submit them by the dates shown in the following table:

Compliance Method being switched to	Notification Required	Notification Timing
Organic HAP emissions limit averaging provisions	A Notification of Compliance Status as specified in §63.9(h)	No later than 1 year plus 30 days after switching compliance methods.
Organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging		

Reporting:

- 1) The permittee shall submit each report in Table 14 of 40 CFR Part 63, Subpart WWWW that applies. [§63.5910(a)]
- 2) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee shall submit each report by the date specified in Table 14 of 40 CFR Part 63, Subpart WWWW and according to the following requirements: [§63.5910(b)]
 - a) Compliance reports shall cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.5910(b)(3)]
 - b) Compliance reports shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.5910(b)(4)]

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- c) As the permittee is subject to permitting requirements under 40 CFR Part 70, the permittee may submit their 40 CFR Part 63, Subpart WWWW compliance reports in conjunction with their 40 CFR Part 70 semi-annual monitoring reports. [§63.5910(b)(5)]
 - 3) The compliance report shall contain the information in following: [§63.5910(c)]
 - a) Company name and address. [§63.5910(c)(1)]
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
 - c) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
 - d) If the permittee had a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with their startup, shutdown, and malfunction plan, the compliance report shall include the information in §63.10(d)(5)(i). [§63.5910(c)(4)]
 - e) If there are no deviations from any organic HAP emissions limitations, and there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]
 - 4) For each deviation from an organic HAP emissions limitation and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report shall contain the information in Paragraphs (c)(1) through (4) and in Paragraphs (d)(1) and (2). This includes periods of startup, shutdown, and malfunction. [§63.5910(d)]
 - a) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]
 - 5) Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 shall report all deviations as defined in 40 CFR Part 70 in the semi-annual monitoring report required by §70.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 of 40 CFR Part 63, Subpart WWWW along with, or as part of, the semi-annual monitoring report required by §70.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation or work practice requirement in 40 CFR Part 63, Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.5910(g)]
 - 6) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 of 40 CFR Part 63, Subpart WWWW, and not based on the requirements in §63.999. [§63.5910(h)]
 - 7) Where multiple compliance options are available, the permittee shall state in each compliance report if the permittee has changed compliance options since their last compliance report. [§63.5910(i)]
 - 8) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
 - 9) The permittee shall report any deviations from the open molding organic HAP emission factors, organic HAP content, standards, open molding compliance options, general requirements, initial compliance, continuous compliance, monitoring/recordkeeping, notification, and reporting

requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

Table 14 — *Requirements for Reports*

As required in §63.5910(a), (b), (g), and (h), the permittee shall submit reports on the schedule shown in the following table:

Report	Report Contents	Report Timing
Compliance report	A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply.	Semi-annually according to the requirements in §63.5910(b).
	The information in §63.5910(d) if the permittee had a deviation from any emission limitation (emission limit or work practice standard) during the reporting period.	
	The information in §63.10(d)(5)(i) if the permittee had a startup, shutdown or malfunction during the reporting period, and the permittee took actions consistent with their startup, shutdown, and malfunction plan	
An immediate startup, shutdown, and malfunction report if the permittee had a startup, shutdown, or malfunction during the reporting period that is not consistent with their startup, shutdown, and malfunction plan	Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless the permittee has made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii)).

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.

None

IV. Core Permit Requirements

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

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

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

- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants

from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.250 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.

10 CSR 10-6.280 Compliance Monitoring Usage

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

- iii) 10 CSR 10-6.070, "New Source Performance Standards";
- iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone
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- 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*

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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semiannually 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. 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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:

- a) The identification of each term or condition of the permit that is the basis of the certification;
- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and

- d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Shane Edwards, President. 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) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon

approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
or

- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Edwards Fiberglass, Inc., located in Sedalia, Missouri, manufactures a wide range of custom tank designs in various sizes for businesses, industries, and personal use worldwide for the storage of water, chemicals, food products, pharmaceuticals, specialized processes, and government projects. Tanks are formed by first waxing the tank mandrel, and then wrapped with Mylar. Edwards Fiberglass then applies a top coat of Resin with a chopper gun, and applies the C-Veil or Nexus Veil by hand. Then the veil is rolled out and 1/8 inch of Resin & Glass is applied. After the glass hardens, the balance of the tank is then wound with filament with a Resin bath by applying 60 strands of mat through the bath. Then the tank is left to dry and then pulled off the mold. The process currently utilizes a total of five spray guns, with three in use and two that are being repaired, but will be put back in use once repairs are completed. The installation is not a named source on the list of installations listed in 10 CSR 10-6.020 but the installation is a major source of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs).

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)
Volatile Organic Compounds ¹	183.17
Hazardous Air Pollutants ²	> 10/25

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The emission factors used to calculate the Volatile Organic Compounds are from the 2014 and 2015 Emission Inventory Questionnaires and from WebFIRE, EPA’s online emission factors repository, retrieval and development tool.

²The Hazardous Air Pollutants PTE was not calculated as the reported emissions for Styrene are above the major source thresholds of 10 tons per year for an individual HAP and 25 tons per year in total HAP emissions as shown in the Reported Air Pollutant Emissions Table below.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
Volatile Organic Compounds ^{1,2} (VOCs)	30.98	24.92	25.76	31.17	28.11
Hazardous Air Pollutants ^{2,3} (HAPs)	28.11	28.11	28.11	28.11	28.11
Styrene 100-42-5 ³ (Hazardous Air Pollutant)	28.11	28.11	28.11	28.11	28.11

¹The installation does emit HAPS; however, the installation reports their HAP emissions as VOCs. as explained in

10 CSR 10-6.110 - *Reporting Emission Data, Emission Fees, and Process Information.*

²The HAP emissions are reported as VOC’s. Because the reported VOC Emissions are lower than the reported HAP emissions, the EIQ Unit is working with the installation to resolve the discrepancy.

³The HAP emissions shown in the table above were taken from the installations EIQ, form 2.T, and converted to tons/year.

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 December 23, 2015
- 2) 2015 Emissions Inventory Questionnaire, received March 17, 2016
- 3) 2014 Emissions Inventory Questionnaire, received April 7, 2015
- 4) Part 70 Operating Permit Number: OP2011-029, issued July 5, 2011 and
- 5) 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.

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

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

Construction Permit History

No Construction Permit Required, Issued January 24, 2008

This letter allowed the like-kind replacement involving the replacement of five existing spray guns with five new low emission spray guns which utilize Fluid Impingement Technology (FIT[®]).

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart VVV – *Standard of Performance for Polymeric Coating of Supporting Substrates Facilities* is not applicable to the installation and has not been applied within this permit. The installation does not perform polymeric coating of supporting substrates as defined within §60.741(a). [§60.740(a)]

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart NNN – *National Emission Standards for Hazardous Air Pollutants for Wool Fiberglass Manufacturing* is not applicable to the installation and has not been applied within this permit. The installation does not meet the definition of wool fiberglass manufacturing facility within §63.1381. [§63.1380(a)]

40 CFR Part 63, Subpart HHHH – *National Emission Standards for Hazardous Air Pollutants for Wet-Formed Fiberglass Mat Production* is not applicable to the installation and has not been applied within this permit. The installation does not meet the applicability criteria within §63.2981 as the installation does not operate a drying or curing oven.

40 CFR Part 63, Subpart WWWW – *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production* is applicable to all emission processes at the installation and has been applied within this permit (see Permit Condition PW001). The installation meets the applicability criteria within §63.5785 as the installation is a major source of HAPs and the installation molds plastics using resins and gel coats containing styrene (110-42-5). In order for the facility to meet the standards for open molding or centrifugal casting operations in Table 3 of 40 CFR Part 63, Subpart WWWW the facility has four compliance options that they must use to demonstrate compliance. The facility can choose to switch to another option. When the permittee changes to an option based on a 12-month rolling average, the permittee shall base the average on the previous 12 months of data calculated using the compliance option the permittee is changing to, unless the permittee was previously using an option that did not require the permittee to maintain records of resin and gel coat use. In this case, the permittee shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. [§63.5810] The options include the following:

- a) The permittee shall demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 to subpart 40 CFR Part 63, Subpart WWWW.
- b) The permittee shall demonstrate that, on average, the permittee meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type as shown in Table 3.
- c) Demonstrate compliance with a weighted average emission limit.
- d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.

The facility has stated that they will demonstrate compliance with a weighted average emission limit.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

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 10-6.170 - *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is not applicable to the installation as they do not have Potential to Emit particulate matter or opacity.

10 CSR 10-6.220 - *Restriction of Emission of Visible Air Contaminants* is not applicable to the installation as they do not have Potential to Emit particulate matter or opacity.

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 APCP'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 APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

Three public comments were received from Mr. Mark A. Smith with the Environmental Protection Agency, Region 7 on July 29, 2016.

Comment 1: The open molding compliance option requirements from 40 CFR Part 63, Subpart WWWW (§63.5810), provides four (4) separate options:

- a) The permittee shall demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 to subpart 40 CFR Part 63, Subpart WWWW.
- b) The permittee shall demonstrate that, on average, the permittee meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type as shown in Table 3.
- c) Demonstrate compliance with a weighted average emission limit.
- d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.

The draft operating permit includes all of the individual specific requirements for all four (4) of these options. However, EPA's records indicate that Edwards Fiberglass, Inc. has selected the weighted average emission limit option; option c). Therefore, EPA suggests that the requirements of option c) be the only requirements detailed in Permit Condition PW001 and suggests MDNR either remove the other options completely or move the requirements for the other options to either Section V; General Permit Requirements under 10 CSR 10-6.065(6)(C)1.I "*Reasonably Anticipated Operating Scenarios*"; or to the Statement of Basis.

Response to Comment: The three other options have been removed from PW001 and moved to the Statement of Basis.

Comment 2: There are several references to Table One in 40 CFR Part 63, Subpart WWWW; Table Three in 40 CFR Part 63, Subpart WWWW; Table Four 40 CFR Part 63, Subpart WWWW; and Table Seven in 40 CFR Part 63, Subpart WWWW. It is customary practice to reference tables with their numerical numbers (1,3,4,7) and not through the use of letters (One, Three, Four, Seven). Also, the reference to 40 CFR Part 63, Subpart WWWW is certainly accurate, however it is apparent that the appropriate portions of these referenced tables have been included in Permit Condition PW001 and therefore, EPA suggests the stated reference to 40 CFR Part 63, Subpart WWWW should be deleted.

Response to Comment: Corrected.

Comment 3: There are multiple references to "of this section" and "in this section" throughout Permit Condition PW001. These applicable requirements are incorporated into an operating permit and operating permits do not contain section. In many, if not all cases, removal of the words "in this section" and "of this section" will require no additional information be added into Permit Condition PW001 and EPA suggests elimination of these phrases.

Response to Comment: The phrases have been eliminated.

Mr. Shane Edwards
Edwards Fiberglass, Inc.
1415 East Boonville Street
Sedalia, MO 65301

RE: Part 70 Operating Permit, Project:
Response to Comments

Dear Mr. Edwards:

The Missouri Air Pollution Control Program (APCP) has received comments submitted during the public comment period on the draft Part 70 Operating Permit for Edwards Fiberglass. The APCP has revised your draft operating permit in response to all comments received. Enclosed is the APCP's response to these comments and a copy of the revised operating permit which is being submitted to the Environmental Protection Agency (EPA) for their review.

The EPA has 45 days from the receipt of this operating permit to notify the Missouri APCP of any objections. If the EPA has no objections, your operating permit will be issued shortly after this period. If the EPA does have objections, additional changes or revisions may be required to the operating permit to respond to the EPA's comments.

If you have any questions or additional comments, please contact Kristin Bailey 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.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield
Environmental Engineer

MJS/kb

Enclosure: Proposed Final Title V Operating Permit
Response to Public Comments

c: PAMS File 2015-12-041
Kansas City Regional Office



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

OCT 04 2016

Mr. Shane Edwards
Edwards Fiberglass, Inc.
1415 East Boonville Street
Sedalia, MO 65301

Re: Edwards Fiberglass, Inc., 159-0056
Permit Number: OP2016-034

Dear Mr. Edwards:

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

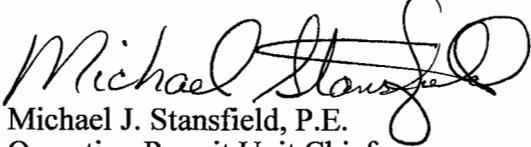
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS:kbj

Enclosures

c: PAMS File: 2015-12-041

