PERMIT TO OPERATE
INTERMEDIATE STATE

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.

Intermediate Operating Permit Number: OP2018-081
Expiration Date: OCT 01 2023
Installation ID: 097-0058
Project Number: 2015-06-043

Installation Name and Address
Justin Boot Plant 417
2236 Missouri Ave
Carthage, MO 64836
Jasper County

Parent Company’s Name and Address
Justin Brands, Inc.
610 W Daggett Ave
Fort Worth, TX 76104

Installation Description:
Justin Boot Company - Plant 417 manufactures leather boots. The manufacturing processes include gluing, sanding, trimming, dyeing, staining, chlorination, and cleaning. The permittee has accepted voluntary limitations on VOC and HAPs for this intermediate operating permit.

OCT 01 2018
Effective Date

[Signature]
Director or Designee
Department of Natural Resources
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I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP02</td>
<td>Leather Sanding</td>
</tr>
<tr>
<td>EP03</td>
<td>Inseam Trim</td>
</tr>
<tr>
<td>EP08</td>
<td>Final Touch up</td>
</tr>
<tr>
<td>EP13</td>
<td>Edge Spray</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Prefit Glue</td>
</tr>
<tr>
<td>EP04</td>
<td>Bottom Cement</td>
</tr>
<tr>
<td>EP05</td>
<td>Edge Dye</td>
</tr>
<tr>
<td>EP06</td>
<td>Cleaning</td>
</tr>
<tr>
<td>EP07</td>
<td>Bottom Stain</td>
</tr>
<tr>
<td>EP09</td>
<td>Maintenance</td>
</tr>
<tr>
<td>EP10</td>
<td>Chlorination/Cement</td>
</tr>
<tr>
<td>EP12</td>
<td>Stock Fitting</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001
10 CSR 10-6.020(2)(l)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

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

Monitoring/Recordkeeping:
The permittee shall use Attachment A, or its equivalent, to demonstrate compliance with this condition.

Reporting:
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov no later than ten (10) days after the end of the month during which the records indicate that an emission limitation has been exceeded.
2) The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002
10 CSR 10-6.020(2)(l)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:
The permittee shall emit less than ten (10) tons in any consecutive 12-month period of any single hazardous air pollutant (HAP), and less than twenty-five (25) tons in any consecutive 12-month period of all HAPs combined, from the entire installation.

Monitoring/Recordkeeping:
The permittee shall use Attachments B and C, or their equivalent, to demonstrate compliance with this condition. The permittee shall maintain records of the Safety Data Sheets (SDS) for all materials used at the installation for which there are SDS available.

Reporting:
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 179, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov no later than ten (10) days after the end of the month during which the records indicate that an emission limitation has been exceeded.
2) The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring and compliance certification required by Section V of this permit.
III. Emission Unit Specific Emission Limitations

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

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</tbody>
</table>

**Emission Limitation:**

1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]

2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]

3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

**Monitoring:**

1) Monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
         (1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
   2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
   3) Observations are only required when the emission units are operating and when the weather conditions allow.
   4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
   5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
   6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego
Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

**Record Keeping:**
1) The permittee shall maintain records of all observation results for each emission unit using Attachments C1 and C2 or equivalent forms.
2) The permittee shall make these records available immediately for inspection to the Department of Natural Resources’ personnel upon request.
3) The permittee shall retain all records for five years.

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring and compliance certification required by Section V of this permit.
IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

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

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

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

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

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

**10 CSR 10-6.065 Operating Permits**

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

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

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

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

3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation’s emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

**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 a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

**Emission Limitation:**

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

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

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:

   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

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

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

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

3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.
10 CSR 10-6.280 Compliance Monitoring Usage

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

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

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

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

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

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

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

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

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

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

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

**10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C Permit Duration**

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

**10 CSR 10-6.065, §(5)(C)1 and §(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) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
   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.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)
If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(5)(C)1.A General Requirements
1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

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

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

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

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.

6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios
None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements
1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted 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, §(5)(C)1 and §(6)(C)7 Emergency Provisions

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

d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

### 10 CSR 10-6.065(5)(C)5 Off-Permit Changes

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

a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.

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 written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and

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

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

The application utilized in the preparation of this permit was signed by Randy Watson, Chairman/CEO. On March 30, 2017, the Air Pollution Control Program was informed that Robert G Crouchley, Jr., Executive Vice President and General Manager is now the responsible official. 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.
**Attachment A**  
**VOC Tracking Log**

This attachment is for showing compliance for Permit Condition PW001.

This sheet covers the month of ____________ in the year ____________.

<table>
<thead>
<tr>
<th>Material Used (Name, Type)</th>
<th>Amount Used (gal)</th>
<th>Density(^1) (lb/gal)</th>
<th>VOC Content(^2) (Weight %)</th>
<th>Monthly VOC Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

**Monthly VOC Emissions\(^3\) (tons):**

**12-Month Rolling Total VOC Emissions\(^4\) (tons):**

---

\(^1\) From the SDS for the material. If specific gravity is provided instead, the density can be obtained by multiplying the specific gravity by 8.33.

\(^2\) From the SDS for the material. If a range of VOC contents is provided, the highest value in the range shall be used to demonstrate compliance.

\(^3\) Sum of this month’s VOC Emissions. Includes Startup, Shutdown, and Malfunction (SSM) Emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement Section per 10 CSR 10-6.050.

\(^4\) 12-Month Rolling VOC Emissions = the sum of the 12 most recent Monthly VOC Emissions. 12-Month Rolling Total VOC Emissions of less than 100.0 tons indicates compliance.
10 CSR 10-6.065, §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit shall be reopened for cause if:

1) The Missouri Department of Natural Resources (MoDNR) or the Environmental Protection Agency (EPA) determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.
**Attachment B1**
Combined HAP Tracking Log

This attachment is to show compliance with Permit Condition PW002.

This sheet covers the month of _______ in the year _________.

<table>
<thead>
<tr>
<th>Material Used (Name, HAP, CAS#)</th>
<th>Monthly Amount of Material Used (including units)</th>
<th>Density (lb/gal)</th>
<th>Combined HAP Content^5 (Weight%)</th>
<th>Monthly Combined HAP Emissions^8 (tons)</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

**Monthly Combined HAP Emissions (tons)^7:**

**12-Month Rolling Total Combined HAP Emissions (tons)^8:**

---

5 Combined HAP content should be obtained from the SDS sheet as the sum of all individual HAP contents. If a range of individual HAP contents is given, use the largest value in the range.

6 If usage is in tons: \([\text{Amount of Material Used}] \times [\text{HAP Content}] = [\text{HAP Emissions}]\)

   If usage is in pounds: \([\text{Amount of Material Used}] \times [\text{HAP Content}] / [2000 \text{ lb/ton}] = [\text{HAP Emissions}]\)

   If usage is in gallons: \([\text{Amount of Material Used}] \times [\text{Density}] \times [\text{HAP Content}] / [2000 \text{ lb/ton}] = [\text{HAP Emissions}]\)

7 Monthly Combined HAP emissions (tons) = the sum of each emission source’s Monthly Combined HAP emissions (tons). The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

8 12-Month Rolling Total Combined HAP Emissions = the sum of the 12 most recent Monthly Combined HAP Emissions. 12-Month Rolling Total Combined HAP Emissions of less than 25.0 tons indicates compliance.
Attachment B2
Individual HAP Tracking Log

This attachment is to show compliance with Permit Condition PW002.

This sheet covers the month of ___________ in the year ___________.

HAP Name and CAS #:

<table>
<thead>
<tr>
<th>List Materials Used that contain this HAP (Name)</th>
<th>Monthly Amount of Material Used (include units)</th>
<th>Density (lb/gal)</th>
<th>Individual HAP Content^2 (weight %)</th>
<th>Monthly Individual HAP Emissions^10 (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

9 Individual HAP content should be obtained from the SDS. If a range of individual HAP contents is given, use the largest value in the range.

10 If usage is in tons: [Amount of Material Used] \times [HAP Content] = [HAP Emissions]
If usage is in pounds: [Amount of Material Used] \times [HAP Content] / [2000 lb/ton] = [HAP Emissions]
If usage is in gallons: [Amount of Material Used] \times [Density] \times [HAP Content] / [2000 lb/ton] = [HAP Emissions]
The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

11 Monthly Individual HAP emissions (tons) = the sum of each emission source’s Monthly Individual HAP emissions (tons). The installation is required to include start-up, shutdown, and malfunction (SSM) combined HAP emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

12 12-Month Rolling Total Individual HAP Emissions = the sum of the 12 most recent Monthly Individual HAP Emissions. 12-Month Rolling Total Individual HAP Emissions of less than 10.0 tons indicates compliance.
## Method 22 Visible Emissions Observations

<table>
<thead>
<tr>
<th>Installation Name</th>
<th>Observer Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Date</td>
</tr>
<tr>
<td>Sky Conditions</td>
<td>Wind Direction</td>
</tr>
<tr>
<td>Precipitation</td>
<td>Wind Speed</td>
</tr>
<tr>
<td>Time</td>
<td>Emission unit</td>
</tr>
</tbody>
</table>

Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.

<table>
<thead>
<tr>
<th>Minute</th>
<th>0</th>
<th>15</th>
<th>30</th>
<th>45</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Visible Emissions Yes (Y) or No (N)</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
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<td>3</td>
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<td>5</td>
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<tr>
<td>6</td>
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</tr>
</tbody>
</table>

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.
## Attachment C2

### Method 9 Opacity Observations

<table>
<thead>
<tr>
<th>Installation Name:</th>
<th>Sketch of the observer’s position relative to the emission unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Emission Unit:</td>
<td></td>
</tr>
<tr>
<td>Observer Name and Affiliation:</td>
<td></td>
</tr>
<tr>
<td>Observer Certification Date:</td>
<td></td>
</tr>
<tr>
<td>Method 9 Observation Date:</td>
<td></td>
</tr>
<tr>
<td>Height of Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Time:</td>
<td>Start of observations</td>
</tr>
<tr>
<td>Distance of Observer from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Observer Direction from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Approximate Wind Direction:</td>
<td></td>
</tr>
<tr>
<td>Estimated Wind Speed:</td>
<td></td>
</tr>
<tr>
<td>Ambient Temperature:</td>
<td></td>
</tr>
<tr>
<td>Description of Sky Conditions (Presence and color of clouds):</td>
<td></td>
</tr>
<tr>
<td>Plume Color:</td>
<td></td>
</tr>
<tr>
<td>Approximate Distance Plume is Visible from Emission Point:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Minute</th>
<th>0</th>
<th>15</th>
<th>30</th>
<th>45</th>
<th>1-minute Avg. % Opacity</th>
<th>6-minute Avg. % Opacity</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
<td>Attached</td>
<td>Detached</td>
</tr>
<tr>
<td>0</td>
<td></td>
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<td></td>
<td></td>
<td>N/A</td>
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<td>1</td>
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<td>N/A</td>
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<td>N/A</td>
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<td>3</td>
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<td>N/A</td>
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<td>N/A</td>
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<td>N/A</td>
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<td>N/A</td>
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<td>8</td>
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<td>N/A</td>
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<td>N/A</td>
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<td>10</td>
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<td>N/A</td>
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<tr>
<td>11</td>
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<td></td>
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<td>N/A</td>
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<tr>
<td>12</td>
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<td></td>
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<td>N/A</td>
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</tbody>
</table>

13 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
14 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
15 Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.
The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%.
Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 60%.

Was the emission unit in compliance at the time of evaluation (yes or no)?

________________________

Signature of Observer
**STATEMENT OF BASIS**

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

**INSTALLATION DESCRIPTION**
Justin Boot Company - Plant 417 manufactures leather boots. The manufacturing processes include gluing, sanding, trimming, dyeing, staining, chlorination, and cleaning. The permittee has accepted voluntary limitations on VOC and HAPs for this intermediate operating permit. It is not a named source as defined in 10 CSR 10-6.020 so fugitive emissions not included in the potential to emit (PTE) calculations.

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>PTE 17</th>
<th>2017</th>
<th>2014</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter</td>
<td>1.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>≤ Ten Microns (PM₁₀)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Particulate Matter</td>
<td>1.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>≤ 2.5 Microns (PM₂₅)</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Volatile Organic Compounds</td>
<td>&lt; 100</td>
<td>11.05</td>
<td>20.21</td>
<td>11.82</td>
</tr>
<tr>
<td>VOC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazardous Air Pollutants</td>
<td>&lt; 10/25</td>
<td>3.85</td>
<td>5.70</td>
<td>3.49</td>
</tr>
<tr>
<td>(HAPs)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Isomers of Xylene</td>
<td>&lt; 10</td>
<td>0.06</td>
<td>0.16</td>
<td></td>
</tr>
<tr>
<td>(1330-20-7)</td>
<td></td>
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</tr>
<tr>
<td>Toluene</td>
<td>&lt; 10</td>
<td>2.50</td>
<td>4.39</td>
<td></td>
</tr>
<tr>
<td>(108-88-3)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N-Hexane</td>
<td>&lt; 10</td>
<td>0.79</td>
<td>1.14</td>
<td></td>
</tr>
<tr>
<td>(110-54-3)</td>
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</tbody>
</table>

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

1) Intermediate Operating Permit Application, received June 12, 2015, revised March 30, 2017;
2) 2017 Emissions Inventory Questionnaire, received March 2, 2018; and

---

16 Reported HAPs below 0.1 tons/year not listed. The installation submitted a reduced EIQ for 2015 and 2016.
17 Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

**Construction Permit History**

No construction permits have been issued to this facility

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

No New Source Performance Standards apply to this facility.

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

40 CFR Part 63, Subpart OOOO – *National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles*

This subpart does not apply. This subpart applies to installations that are a major source of HAPs that conduct printing, coating, slashing, dyeing, or finishing of fabric and other textiles as defined by this subpart. This installation is not a major source of HAPs, thus this subpart is not applicable. If the installation becomes a major source of HAPs, this installation may need to be reevaluated for Subpart OOOO applicability.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

**Missouri Code of State Regulations (CSR) Applicability**

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 10-6.080, *Emission Standards for Hazardous Air Pollutants*

10 CSR 10-6.250, *Asbestos Projects – Certification, Accreditation and Business Exemption Requirements*

Not applicable. See discussion under National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.
10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
While this rule applies, this operating permit does not require monitoring and recordkeeping to demonstrate compliance with the rule. The emission points at this installation all have a potential to emit below 0.5 lb/hr of particulate matter. No visible emissions are expected from these sources. As a result, monitoring and recordkeeping is not required.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
This rule applies and has been incorporated into the operating permit.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This rule does not apply. The following units apply coatings and dyes through brushing, dipping, etc., where the paint is not aerosolized in the air as it would if it were sprayed. Particulate matter (PM) is not expected to release in the air from coatings and dyes if they are not spray-applied. As a result, the rule is not applicable to the following units:

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Prefit Glue</td>
</tr>
<tr>
<td>EP04</td>
<td>Bottom Cement</td>
</tr>
<tr>
<td>EP05</td>
<td>Edge Dye</td>
</tr>
<tr>
<td>EP06</td>
<td>Cleaning</td>
</tr>
<tr>
<td>EP07</td>
<td>Bottom Stain</td>
</tr>
<tr>
<td>EP08</td>
<td>Final Touch up</td>
</tr>
<tr>
<td>EP09</td>
<td>Maintenance</td>
</tr>
<tr>
<td>EP10</td>
<td>Chlorination / Cement</td>
</tr>
<tr>
<td>EP12</td>
<td>Stock Fitting</td>
</tr>
</tbody>
</table>

The following units meet exemption (1)(B)12 for having the potential to emit below 0.5 lb/hr:

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>MHDR</th>
<th>EF</th>
<th>Source</th>
<th>PTE (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP02</td>
<td>Leather Sanding</td>
<td>0.0043 ton/hr</td>
<td>2.8575 lb/ton</td>
<td>2017 EIQ</td>
<td>0.01</td>
</tr>
<tr>
<td>EP03</td>
<td>Inseam Trim</td>
<td>0.0021 ton/hr</td>
<td>2.8575 lb/ton</td>
<td>2017 EIQ</td>
<td>&lt; 0.01</td>
</tr>
<tr>
<td>EP08</td>
<td>Final Touch up</td>
<td>0.019 gal/hr</td>
<td>8.97 lb/gal 19</td>
<td>Eng. Calc.</td>
<td>0.17</td>
</tr>
<tr>
<td>EP13</td>
<td>Edge Spray</td>
<td>0.005 gal/hr</td>
<td>8.33 lb/gal 20</td>
<td>Eng. Calc.</td>
<td>0.04</td>
</tr>
</tbody>
</table>

**Greenhouse Gas Emissions**
This installation is likely a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO2e

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18 Based off of 2017 EIQ reported throughput with a 10% safety factor.
19 Assumes conservative assumption of 100% solids content in the solvents used. An assumed specific gravity of 1.0766 was obtained from 2014 usage data for EP22 Final Touch-up Spray of Justin Boots Plant 414 (ID: 009-0052), an identical process.
20 Assumes conservative assumption of 100% solids content in the solvents used. An assumed specific gravity of 1.0 was obtained from 2014 usage data for EP01 Edge Spray of Justin Boots Plant 414 (ID: 009-0052), an identical process.
emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂e emissions were not included within this permit.

**Other Regulatory Determinations**

None.

**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**

A draft permit was put up on public notice on August 10, 2018 for 30 days. During this period no public comments were received.
OCT 01 2018

Mr. Herb Beckwith
Justin Boot Plant 417
2236 Missouri Ave
Carthage, MO 64836

Re: Justin Boot Plant 417, 097-0058
Permit Number: OP2018-081

Dear Mr. Beckwith:

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

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:kwj

Enclosures

c: PAMS File: 2015-06-043