

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2017-083  
**Expiration Date:** NOV 29 2022  
**Installation ID:** 145-0005  
**Project Number:** 2014-12-061

**Installation Name and Address**

La-Z-Boy Midwest  
4301 Howard Bush Drive  
Neosho, MO 64850  
Newton County

**Parent Company's Name and Address**

La-Z-Boy Incorporated  
One La-Z-Boy Drive  
Monroe, MI 48162

**Installation Description:**

La-Z-Boy Midwest operates a furniture manufacturing plant in Neosho, Missouri. The installation manufactures upholstered furniture on wood frames. The installation also supplies other La-Z-Boy plants with the finished metal parts that are assembled into recliner mechanisms. Operations include one spray adhesive booth, an aqueous degreaser tank, an electro deposition paint machine, and a paint oven.

The installation has the potential to emit above major levels of HAPs.

Prepared by  
Kasia Wasescha  
Operating Permit Unit

Director or Designee  
Department of Natural Resources

**NOV 29 2017**

Effective Date

## Table of Contents

<b>I. INSTALLATION EQUIPMENT LISTING .....</b>	<b>3</b>
EMISSION UNITS WITH LIMITATIONS .....	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS .....	3
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>4</b>
PERMIT CONDITION PW001 .....	4
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations .....	4
40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations	4
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>8</b>
PERMIT CONDITION 001 .....	8
10 CSR 10-6.060 Construction Permits Required.....	8
Construction Permit 072002-011, issued July 2, 2002 .....	8
PERMIT CONDITION 002.....	8
10 CSR 10-6.060 Construction Permits Required.....	8
Construction Permit 072002-011A, issued March 13, 2015 .....	8
PERMIT CONDITION 003.....	9
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants .....	9
PERMIT CONDITION 004.....	10
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions .....	10
PERMIT CONDITION 005.....	12
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations .....	12
40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines .....	12
PERMIT CONDITION 006.....	14
10 CSR 10-6.065 Voluntary Limitation(s).....	14
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>16</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>21</b>
<b>VI. ATTACHMENTS .....</b>	<b>26</b>
ATTACHMENT A .....	27
Monthly VOC Tracking Record.....	27
ATTACHMENT B1.....	28
Combined HAP Compliance Worksheet.....	28
ATTACHMENT B2.....	29
Individual HAP Compliance Worksheet .....	29
ATTACHMENT C.....	30
10 CSR 10-6.400 Demonstration .....	30
ATTACHMENT D .....	31
OSHA Chemicals .....	31
ATTACHMENT E.....	34
Pressure Drop Monitoring .....	34
ATTACHMENT F.....	35
Inspection/Maintenance/Repair/Malfunction Log.....	35
ATTACHMENT G .....	36
Visible Emission Observations.....	36
ATTACHMENT H .....	37
Method 9 Opacity Emissions Observations .....	37

## 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.

<b>Emission Unit</b>	<b>Description</b>
EP-01	Poly Adhesive (water base) Spray Booth; 1.17 gal/hr; controlled with dry filter, installed ca. 1996
EP-02	Aqueous Degreaser Tank, 1 gal/hr
EP-02B	Electro Deposition Paint Machine; 2 gal/hr, installed 1993
EP-20	Firefighting water pump engine, 175-hp diesel-fired; installed 1971
EP-22	Lochinvar Low Pressure Boiler #1; natural gas-fired; 1.5 MMBtu/hr; installed 2012
EP-23	Lochinvar Low Pressure Boiler #2; natural gas-fired; 1.5 MMBtu/hr; installed 2012
EP-24	Lochinvar Low Pressure Boiler #3; natural gas-fired; 1.5 MMBtu/hr; installed 2012

### 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.

<b>Emission Unit</b>	<b>Description</b>
EP-03	Electro deposition paint oven, 1.2 MMBtu/hr, natural gas-fired, installed 1993
EP-12	Storage tank, 600-gal diesel fuel, prior to 1985
EP-13	Storage tank, 600-gal unleaded gasoline, prior to 1985
EP-14	Storage tank, 300-gal diesel fuel for fire pump engine, prior to 1985
EP-15	Misc. Combustion Unit (space heaters); natural gas-fired; 6.3 MMBtu/hr
EP-17	Fugitive Emissions Adhesives; 1.62 gal/hr
-	Non-spray adhesive application
-	Wax application booth; installed 1999

## 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 10-6.075 Maximum Achievable Control Technology Regulations  
40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations

#### **Operational Limitations:**

At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.802(c)]

#### **Work Practice Standards:**

1. *Work practice implementation plan.* [§63.803(a)]
  - a) The permittee shall continue to maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation<sup>1</sup> and addresses each of the work practice standards presented in paragraphs §63.803(b) through (k). [§63.803(a)(1)]
  - b) The written work practice implementation plan shall be available for inspection by the Administrator (or delegated State, local or Tribal authority) upon request. If the Administrator (or delegated State, local, or Tribal authority) determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implanted, the Administrator (or delegated State, local, or Tribal authority) may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit. [§63.803(a)(2)]
  - c) The inspection and maintenance plan required by §63.803(c) are also reviewable by the Administrator (or delegated State, local, or Tribal authority). [§63.803(a)(3)]
2. *Operator training course.* [§63.803(b)]
  - a) The permittee shall train all new and existing personnel, including contract personnel, who are involved in gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of MACT JJ. All new personnel shall be trained upon hiring. All personnel shall be given refresher training annually. The affected source shall maintain a

---

<sup>1</sup> *Wood furniture manufacturing operations* means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.

- copy of the training program with the work practice implementation plan. The training program shall include, at minimum, the following: [§63.803(b)]
- i) A list of all current personnel by name and job description that are required to be trained; [§63.803(b)(1)]
  - ii) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel; [§63.803(b)(2)]
  - iii) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and [§63.803(b)(3)]
  - iv) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion. [§63.803(b)(4)]
3. *Inspection and maintenance plan.* [§63.803(c)]
- a) The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies: [§63.803(c)]
    - i) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents; [§63.803(c)(1)]
    - ii) An inspection schedule; [§63.803(c)(2)]
    - iii) Methods for documenting the date and results of each inspection and any repairs that were made; [§63.803(c)(3)]
    - iv) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule: [§63.803(c)(4)]
      - (1) A first attempt at repair (e.g. tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and [§63.803(c)(4)(i)]
      - (2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months. [§63.803(c)(4)(ii)]
4. *Cleaning and washoff solvent accounting system.* [§63.803(d)]
- a) The permittee shall develop an organic HAP solvent account form to record: [§63.803(d)]
    - i) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 or this subpart; [§63.803(d)(1)]
    - ii) The number of pieces washed off, and the reason for the washoff; and [§63.803(d)(2)]
    - iii) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite. [§63.803(d)(3)]
5. *Chemical composition of cleaning and washoff solvents.* For each affected source, the permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of MACT JJ (see Attachment D), in concentrations subject to MSDS reporting as required by OSHA. [§63.803(e)]
6. *Spray booth cleaning.* The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters, and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating. [§63.803(f)]

7. *Storage requirements.* The permittee shall use normally closed containers for storing gluing, cleaning, and washoff materials. [§63.803(g)]
8. *Application equipment requirements.* The permittee shall not use conventional air spray guns except when all emission from the finishing application station are routed to a functioning control device. [§63.803(h)]
9. *Line cleaning.* The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container. [§63.803(i)]
10. *Gun cleaning.* The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container. [§63.803(j)]
11. *Washoff operations.* The permittee shall control emissions from a washoff operations by:  
[§63.803(k)]
  - a) Using normally closed tanks for washoff; and [§63.803(k)(1)]
  - b) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible. [§63.803(k)(2)]

**Compliance Procedures:**

1. *Continuous Compliance Demonstrations.* [§63.804(g)]
  - a) The permittee shall submit a compliance certification with the semiannual report required by §63.807(c). [§63.804(g)(8)]
    - i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation. [§63.804(g)(8)(i)]
    - ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source. [§63.804(g)(8)(ii)]

**General Provisions:**

The permittee shall comply with the General Provisions that apply to the installation as listed in Table 1 of MACT JJ. [§63.800(e)]

**Recordkeeping:**

1. The permittee shall fulfill all recordkeeping requirements of §63.10 of MACT A, according to the applicability criteria in §63.800(d) of MACT JJ. [§63.806(a)]
2. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of the plan, including, but not limited to: [§63.806(e)]
  - a) Records demonstrating that the operator training program required by §63.803(b) is in place; [§63.806(e)(1)]
  - b) Records collected in accordance with the inspection and maintenance plan required by §63.803(c); [§63.806(e)(2)]
  - c) Records associated with the cleaning solvent accounting system required by §63.803(d); [§63.806(e)(3)]
  - d) Records associated with the formulation assessment plan required by §63.803(1); and [§63.806(e)(5)]

- e) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed. [§63.806(e)(6)]
- 3. The permittee shall maintain records of all other information submitted with the compliance status report required by §63.9(h) and the semiannual reports required by §63.807(c). [§63.806(i)]
- 4. The permittee shall maintain all records in accordance with the requirements of §6.10(b)(1). [§63.806(j)]
- 5. The permittee shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment. The permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.802(c), including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation. [§63.806(k)]

**Reporting:**

- 1. The permittee shall fulfill all reporting requirements of §63.7 through §63.10 of MACT A (General Provisions) according to the applicability criteria in §63.800(d) of MACT JJ. [§63.807(a)]
- 2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
- 3. 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 (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.

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 072002-011, issued July 2, 2002	
<b>Emission Unit</b>	<b>Description</b>
EP-02	Aqueous Degreaser Tank
EP-02B	Electro Deposition Paint Machine

**Emission Limitation:**

The permittee shall not emit more than 40.0 tons of VOC in any consecutive 12-month period from the electrodeposition coating operation (EP-02 and EP-02B). [Special Condition 2A]

**Monitoring/Recordkeeping:**

1. The permittee shall maintain an accurate record of VOC emitted into the atmosphere from the equipment of this condition. Attachment A or an equivalent form shall be used for this purpose. [Special Condition 2B]
2. The permittee shall maintain all records required by this condition for no less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 2B]

**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 (10) days after the end of the month during which the records indicate that the emission limit has been exceeded. [Special Condition 3C]
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 072002-011A, issued March 13, 2015	
<b>Emission Unit</b>	<b>Description</b>
EP-02	Aqueous Degreaser Tank
EP-02B	Electro Deposition Paint Machine

**Emission Limitation:**

1. The permittee shall emit less than 25.0 tons of combined HAP in any consecutive 12-month period from the electrodeposition coating operation (EP-02 and EP-02B). [Special Condition 3A]



2. The permittee shall emit less than the respective SMAL for each individual HAP in any consecutive 12-month period from the electrodeposition coating operation (EP-02 and EP-02B). [Special Condition 3B]

**Monitoring/Recordkeeping:**

1. The permittee shall maintain a copy of the most recent version of Missouri's SMALs. The most recent version of Missouri's SMALs is available at: <http://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf> or can be requested from the Air Pollution Control Program's Permit Section, P.O. Box 176, Jefferson City, MO 65102. [Special Condition 3C]
2. The permittee shall maintain records of actual monthly and 12-month rolling total emissions of individual HAP and combined HAP that are being used for EP-02 and EP-02B using Attachments B1 and B2 or equivalent forms approved by the Air Pollution Control Program. [Special Condition 3D]
3. The permittee shall maintain all records required by this permit for no less than five (5) years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS or other coating specification sheets indicating the density and HAP content of each coating used. [Special Condition 3E]

**Reporting:**

1. 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 the end of the month during which the records indicate an exceedance of either of the HAP limitations. [Special Condition 3F]
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
<b>Emission Unit</b>	<b>Description</b>	<b>Stack ID</b>
EP-01	Poly Adhesive (water base) Spray Booth; 1.17 gal/hr; controlled with dry filter, installed ca. 1996	1

**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20%.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for one continuous six minute period in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

1. The permittee shall conduct visible emission observations on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to make observations when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed

the applicable opacity standard, the source representative would then conduct a Method 9 observation.

2. The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachments F, G, and H (or equivalents), noting:

1. Whether any air emissions (except for water vapor) were visible from the emission units;
2. All emission units from which visible emissions occurred;
3. Whether the visible emissions were normal for the process;
4. The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
5. The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

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

<b>PERMIT CONDITION 004</b>	
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions	
<b>Emission Unit</b>	<b>Description</b>
EP-20	Firefighting water pump engine, 175-hp diesel-fired, installed 1971

*Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement<sup>2</sup>*

**Operational Limitation:**

Fuel sulfur content will not contain more than 8,812 parts per million (ppm<sub>v</sub>) of sulfur for distillate fuel.

---

<sup>2</sup> This regulation has not yet been adopted into Missouri’s SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri’s SIP this regulation will be both a state and federal requirement. No action on the part of the permittee is needed to revise the operating permit.

**Monitoring/Recordkeeping:**

1. The permittee shall determine compliance using fuel delivery records, fuel sampling and analysis, performance tests, continuous emission monitoring, or other compliance methods approved by the staff director and the U.S. Environmental Protection agency and incorporated into the state implementation plan.
2. The permittee must maintain a record of data, calculations, results, records and reports from any performance test, continuous emission monitoring, fuel deliveries, and/or fuel sampling tests.
3. The permittee must maintain a record of any applicable monitoring data, performance evaluations, calibration checks, monitoring system and device performance tests, and any adjustments and maintenance performed on these systems or devices.
4. If the permittee is using fuel delivery records for compliance they must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
  - a) The name, address, and contact information of the fuel supplier;
  - b) The type of fuel;
  - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
  - d) The heating value of the fuel.
5. The permittee shall maintain records for a minimum of five (5) years on-site.
6. The permittee shall make all records immediately available to Missouri Department of Natural Resources personnel upon request.

**Reporting:**

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. 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 (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.

<b>PERMIT CONDITION 005</b>	
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds <sup>3</sup>	
Emission Unit	Description
EP-20	Firefighting water pump engine, 175-hp diesel-fired, installed 1971

**Emission Limitation:**

1. The permittee shall not allow the emission in the atmosphere gases containing more than five hundred parts per million by volume (500 ppm<sub>v</sub>) of sulfur dioxide from the engines.

---

<sup>3</sup> This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, Permit Condition 005 shall no longer be enforceable.

2. Stack gases from the engines shall not contain more than thirty five milligrams per cubic meter (35 mg/m<sup>3</sup>) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period.

**Monitoring/Recordkeeping:**

As required by Permit Condition 004.

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

<b>PERMIT CONDITION 006</b>	
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
<b>Emission Point</b>	<b>Description</b>
EP-20	Firefighting water pump engine, 175 hp diesel-fired; installed 1971

**Operational Limitation:**

1. The permittee must comply with the requirements in Table 2d of MACT ZZZZ. [§63.6603(a) & Table 2d of MACT ZZZZ]
  - a) Change oil and filter every 1,000 hours of operation or annually, whichever comes first;<sup>4</sup>
  - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

**General Compliance Requirements:**

1. The permittee must be in compliance with the operational limitations and other requirements in this permit condition at all times. [§63.6605(a)]
2. The permittee must at all times operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may

<sup>4</sup> The permittee has the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of MACT ZZZZ.

include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

3. The permittee must operate and maintain EP-20 according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]

**General Provisions:**

The permittee shall comply with the applicable General Provisions as listed in Table 8 of MACT ZZZZ. [§63.6665]

**Continuous Compliance Requirements:**

1. The permittee shall demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
  - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
  - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2. The emergency generator shall be operated according to the following requirements: [§63.6640(f)]
  - a) There is no time limit on the use of the emergency generator in emergency situations. [§63.6640(f)(1)]
  - b) The permittee may operate the emergency generator for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
    - i) The emergency generator may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency generator beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
  - c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(3)]

**Notifications:**

The permittee shall submit required notifications are specified in §63.6645.

**Recordkeeping:**

1. The permittee shall keep the following records: [§63.6655(a)]
  - a) A copy of each notification and report that they submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
  - b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
  - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
  - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
  - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
2. The permittee must keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that they operated and maintained the stationary RICE according to their own maintenance plan. [§63.6655(e)]
4. The permittee shall keep all fuel records which indicate sulfur content, cetane index, and aromatic content of fuel used.
5. Records may be kept in either written or electronic form and maintained for at least five years. [§63.6660(c)]
6. These records shall be made available immediately for inspection to any Missouri Department of Natural Resources' personnel upon request. [§63.6660(a)]

**Reporting:**

1. The permittee shall report each instance in which they did not meet the requirements of this permit condition or Table 2d of MACT ZZZZ according to the requirements in §63.6650. [§63.6640(b)]
2. The permittee must also report each instance in which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
3. The permittee shall submit applicable reports to the Missouri Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
4. The permittee shall report any deviations from the operational limitation, compliance requirements, notifications, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 007</b>	
10 CSR 10-6.065 Voluntary Limitation(s)	
Emission Point	Description
EP-01	Poly Adhesive (water base) Spray Booth; 1.17 gal/hr; controlled with dry filter, installed ca. 1996

**Operational Limitation:**

1. The permittee shall use a fabric filter at all times during operation of EP-01.
2. The permittee shall maintain the fabric filter in accordance with the manufacturer's specifications.
3. The permittee shall keep replacement filters on hand at all times.

**Monitoring/Recordkeeping:**

1. The permittee shall monitor and record the operating pressure drop across the fabric filter at least once daily using Attachment E or an equivalent. The operating pressure drop shall be maintained within the range specified by the manufacturer.
2. The permittee shall maintain an operating and maintenance log (Attachment F or an equivalent) for the filter, which shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause, and corrective actions;
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc., and
  - c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection.
3. The permittee shall keep all records on-site for a minimum of five (5) years.
4. The permittee shall make these records immediately available to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

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

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

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.

#### **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 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.

#### **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 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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

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

**This requirement is a State Only Requirement.**

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.

**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”;
  - 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(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.
  - 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)**

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(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 permit, 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 Bill Snow, VP of Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control

Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) 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**

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 A**  
 Monthly VOC Tracking Record

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

Material Used <sup>5</sup> (Name, Type)	Amount of Material Used (include units)	Density <sup>6</sup> (lb/gal)	VOC Content <sup>7</sup> (wt%)	VOC Emissions <sup>8</sup> (tons)
<b>Total VOC Emissions Calculated for this Month<sup>9</sup> (tons):</b>				
<b>Monthly Start-Up, Shutdown, and Malfunction (SSM) VOC Emissions for EP-02 and EP-02B<sup>10</sup> (tons):</b>				
<b>12-Month Rolling Total VOC Emissions<sup>11</sup> (tons):</b>				

<sup>5</sup> List all materials used by EP-02 Aqueous Degreaser Tank and EP-02B Electro Deposition Paint Machine  
<sup>6</sup> Obtained from the SDS sheet. If a range is given, use the highest density in the range. If only specific gravity is given, multiply it by 8.33 to convert it to the density unit of lb/gal  
<sup>7</sup> Obtained from the SDS sheet. If a range is given, use the highest VOC content in the range.  
<sup>8</sup> VOC Emissions (tons) = Material Usage (tons) x VOC Content (wt%) = Material Usage (gallons) x Density (lb/gal) x VOC Content (wt%) x 0.0005 (ton/lb) = Material Usage (lbs) x VOC Content (wt%) x 0.0005 (ton/lb).  
<sup>9</sup> Total VOC Emissions Calculated for this Month (tons) = the sum of the VOC Emissions (tons) for each material used by EP-02 and EP-02B.  
<sup>10</sup> Monthly Start-Up, Shutdown, and Malfunction (SSM) Emissions. As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.  
<sup>11</sup> The sum of the most recent 12 months of Monthly VOC Emissions (ton/month). The permittee is in compliance if the 12-Month Rolling Total VOC Emissions are less than 40 tons/year.

**Attachment B1**  
 Combined HAP Compliance Worksheet

This tracking sheet is for the period of \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

Materials Used (Name, Type: Solvent / Ink / Extender)	Amount Used Monthly (gal)	Density <sup>12</sup> (lb/gal)	HAP <sup>13</sup> (Name, CAS)	HAP Content <sup>14</sup> (wt%)	Monthly HAP Emissions <sup>15</sup> (tons)
<b>Sum of Monthly Start-Up, Shutdown, and Malfunction (SSM) Total HAP Emissions from EP-02 and EP-02B (tons/month):</b>					
<b>Sum of Monthly Total HAP Emissions<sup>16</sup> (ton/month):</b>					
<b>12 Month Rolling Total HAP Emissions<sup>17</sup> (tons/year):</b>					

<sup>12</sup> 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.  
<sup>13</sup> Refer to the list of HAPs at <http://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf> to determine if a given chemical is a HAP. List all HAPs contained within the material on this sheet.  
<sup>14</sup> From the SDS for the material. If a range of HAP contents is provided, the highest values in the ranges shall be used to demonstrate compliance.  
<sup>15</sup> Monthly HAP Emissions (tons) = Amount Used Monthly (gallons) x Density (lb/gal) x HAP Content (wt%) x 0.0005 (ton/lb).  
<sup>16</sup> The sum of Monthly HAP Emissions (tons) for each material used by EP-02 and EP-02B and all Monthly SSM Total HAP Emissions (tons) from EP-02 and EP-02B.  
<sup>17</sup> The sum of the most recent 12 months of Monthly Total HAP Emissions (ton/month). The permittee is in compliance if the 12-Month Rolling Total HAP Emissions are less than 25 tons/year.

**Attachment B2**  
Individual HAP Compliance Worksheet

Take the HAP emissions calculated from each material used in Attachment B1 (including SSM emissions) and sum up each individual HAP below.

This tracking sheet is for the period of \_\_\_\_\_ to \_\_\_\_\_.  
(month, year) (month, year)

<b>Individual HAP (Name, CAS)</b>	<b>Monthly Individual HAP Emissions (tons/month)</b>	<b>12-Month Rolling for Individual HAP Emissions<sup>18</sup> (tons/year)</b>	<b>SMAL Threshold</b>

<sup>18</sup> The sum of the most recent 12 months Monthly Individual HAP Emissions (ton/month). The permittee is in compliance if the 12-Month Rolling Individual HAP Emissions are less than the SMAL.

**Attachment C**  
10 CSR 10-6.400 Demonstration

This attachment demonstrates compliance with 10 CSR 10-6.400.

<b>Emission Unit</b>	<b>Description</b>	<b>MHDR (gal/hr)</b>	<b>Density (lb/gal)</b>	<b>Solids (%)</b>	<b>Source<sup>19</sup></b>	<b>Transfer Efficiency (%)</b>	<b>Uncontrolled PM Rate (lb/hr)</b>	<b>Control Efficiency (%)</b>	<b>Compliance</b>
EP-01	Poly Adhesive (water base) Spray Booth	1.17	7.89	59.0	Aquagrip	15	4.08	99	Exempt, control > 90%

<sup>19</sup> Uses the material with the most conservative values for solids % and density that results in the largest PM rate.

**Attachment D**  
**OSHA Chemicals**

Table 4 to Subpart JJ of Part 63—Pollutants Excluded From Use in Cleaning and Washoff Solvents

Chemical Name	CAS No.
4-Aminobiphenyl	92671
Styrene oxide	96093
Diethyl sulfate	64675
N-Nitrosomorpholine	59892
Dimethyl formamide	68122
Hexamethylphosphoramide	680319
Acetamide	60355
4,4'-Methylenedianiline	101779
o-Anisidine	90040
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746016
Beryllium salts	
Benzidine	92875
N-Nitroso-N-methylurea	684935
Bis (chloromethyl) ether	542881
Dimethyl carbamoyl chloride	79447
Chromium compounds (hexavalent)	
1,2-Propylenimine (2-Methyl aziridine)	75558
Arsenic and inorganic arsenic compounds	99999904
Hydrazine	302012
1,1-Dimethyl hydrazine	57147
Beryllium compounds	7440417
1,2-Dibromo-3-chloropropane	96128
N-Nitrosodimethylamine	62759
Cadmium compounds	
Benzo (a) pyrene	50328
Polychlorinated biphenyls (Aroclors)	1336363
Heptachlor	76448
3,3'-Dimethyl benzidine	119937
Nickel subsulfide	12035722
Acrylamide	79061
Hexachlorobenzene	118741

Chemical Name	CAS No.
Chlordane	57749
1,3-Propane sultone	1120714
1,3-Butadiene	106990
Nickel refinery dust	
2-Acetylaminoflourine	53963
3,3'-Dichlorobenzidine	53963
Lindane (hexachlorcyclohexane, gamma)	58899
2,4-Toluene diamine	95807
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444
1,2-Diphenylhydrazine	122667
Toxaphene (chlorinated camphene)	8001352
2,4-Dinitrotoluene	121142
3,3'-Dimethoxybenzidine	119904
Formaldehyde	50000
4,4'-Methylene bis (2-chloroaniline)	101144
Acrylonitrile	107131
Ethylene dibromide (1,2-Dibromoethane)	106934
DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	72559
Chlorobenzilate	510156
Dichlorvos	62737
Vinyl chloride	75014
Coke Oven Emissions	
Ethylene oxide	75218
Ethylene thiourea	96457
Vinyl bromide (bromoethene)	593602
Selenium sulfide (mono and di)	7488564
Chloroform	67663
Pentachlorophenol	87865
Ethyl carbamate (Urethane)	51796
Ethylene dichloride (1,2-Dichloroethane)	107062
Propylene dichloride (1,2-Dichloropropane)	78875
Carbon tetrachloride	56235
Benzene	71432
Methyl hydrazine	60344



Chemical Name	CAS No.
Ethyl acrylate	140885
Propylene oxide	75569
Aniline	62533
1,4-Dichlorobenzene(p)	106467
2,4,6-Trichlorophenol	88062
Bis (2-ethylhexyl) phthalate (DEHP)	117817
o-Toluidine	95534
Propoxur	114261
1,4-Dioxane (1,4-Diethyleneoxide)	123911
Acetaldehyde	75070
Bromoform	75252
Captan	133062
Epichlorohydrin	106898
Methylene chloride (Dichloromethane)	75092
Dibenz (ah) anthracene	53703
Chrysene	218019
Dimethyl aminoazobenzene	60117
Benzo (a) anthracene	56553
Benzo (b) fluoranthene	205992
Antimony trioxide	1309644
2-Nitropropane	79469
1,3-Dichloropropene	542756
7, 12-Dimethylbenz(a) anthracene	57976
Benz(c) acridine	225514
Indeno(1,2,3-cd)pyrene	193395
1,2:7,8-Dibenzopyrene	189559





**Attachment G**  
Visible Emission Observations

Date	Time	Emission Source	Visible Emissions		Excess Emissions		
			No	Yes <sup>20</sup>	Cause	Corrective Action	Initial

<sup>20</sup> If there are visible emissions, the permittee shall complete the excess emissions columns.

**Attachment H**

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

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

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

## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

La-Z-Boy Midwest operates a furniture manufacturing plant in Neosho, Missouri. The installation manufactures upholstered furniture on wood frames. The installation also supplies other La-Z-Boy plants with the finished metal parts that are assembled into recliner mechanisms. Operations include one spray adhesive booth, an aqueous degreaser tank, an electro deposition paint machine, and a paint oven. This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2; therefore, fugitive emissions are not counted towards major source applicability.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>21</sup>
PM <sub>10</sub>	20.71
PM <sub>2.5</sub>	20.71
Sulfur Oxides (SO <sub>x</sub> )	0.06
Nitrogen Oxides (NO <sub>x</sub> )	13.44
Volatile Organic Compounds (VOCs)	40.74
Carbon Monoxide (CO)	2.60
Hazardous Air Pollutants (HAPs) <sup>22</sup>	< 10 / > 25
Ethylene Glycol Monoethyl Ether (112-25-4)	< 10
Vinyl Acetate (108-05-4)	< 10

<sup>21</sup> Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. VOC emissions takes in account the 40 tpy VOC limit on EP-02 and EP-02B. PM<sub>10</sub> and VOC emissions from EP-01 used values given on the Aquagrip SDS sheet.

<sup>22</sup> While there is a 10 / 25 tpy HAP limitation on EP-02 and EP-02B, the remaining emission points not under this limitation emit a small amount of HAPs, putting La-Z-Boy just over the major source threshold for total HAPs.

**Reported Air Pollutant Emissions, tons per year**

<b>Pollutants</b>	<b>2016</b>	<b>2015</b>	<b>2014</b>	<b>2013</b>	<b>2012</b>
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.07	0.06	1.97	2.18	1.84
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.07	0.06	1.97	2.18	1.84
Sulfur Oxides (SO <sub>x</sub> )	< 0.01	< 0.01	< 0.01	0.01	0.01
Nitrogen Oxides (NO <sub>x</sub> )	0.45	0.31	0.61	0.59	0.55
Volatile Organic Compounds (VOC)	22.35	22.47	18.64	21.66	16.64
Carbon Monoxide (CO)	0.38	0.24	0.51	0.47	0.44
Hazardous Air Pollutants (HAPs)	0.19	0.30	0.18	0.20	0.18
Ethylene Glycol Monoethyl Ether (112-25-4)	0.17	0.20	-	-	-
Vinyl Acetate (108-05-4)	0.02	0.01	0.01	0.01	0.02
Diethanolamine (111-42-2)	-	0.07	0.15	0.17	0.14
Ethylbenzene (100-41-4)	-	< 0.01	< 0.01	< 0.01	< 0.01
Formaldehyde (50-00-0)	-	0.01	0.01	0.01	0.01
Isomers of Xylene (1330-20-7)		0.01	0.01	0.01	0.01

**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 31, 2014;
2. 2016 Emissions Inventory Questionnaire, received April 19, 2017;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4. Construction Permit 0491-006, issued April 10, 1991;
5. Construction Permit 1193-009, issued October 27, 1993;
6. Construction Permit 0794-001, issued June 22, 1994;
7. Construction Permit 0995-012, issued September 13, 1995;
8. Construction Permit 0896-004, issued August 7, 1996;
9. Construction Permit 072002-001, issued July 24, 2002;
10. Construction Permit 072002-001A, issued March 13, 2015

### **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.

#### *40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

EP-20 is subject to this subpart. There is no exemption for fire pump engines, nor does EP-20 meet any of the exemptions as listed in this subpart.

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

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

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

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

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

This rule does not apply. While EP-02 and EP-02B process rates would qualify it for 10 CSR 10-6.400 applicability, the PM-containing process solvents and coatings used for these emission points are not spray applied, they are used for dipping, and thus PM is not aerosolized into the air. The wax application is another instance where the wax is not spray-applied. This rule also does not apply to the boilers, oven, and engine because they do not meet the definition of process weight. See Attachment E for an applicability and compliance demonstration.

#### *10 CSR 10-6.405, Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

This rule does not apply. All heaters at this facility are fueled solely by natural gas which is exempt from this rule per 10 CSR 10-6.405(1)(E).

### **Construction Permit History**

#### Construction Permit 0491-006, issued April 10, 1991

This permit was for the installation of a wood-fired boiler. The boiler has been removed and therefore the conditions of this construction permit were not included.

#### Construction Permit 1193-009, issued October 27, 1993

This permit was for the installation of the Aqueous Degreaser Tank, Electro Deposition Paint Machine, and the Electro Deposition Paint Oven.

- Special Conditions 1, 2, and 3 were superseded by Special Condition 1 of Construction Permit 072002-011.
- Special Condition 4 established reporting requirements relating to Special Conditions 1, 2, and 3. Since these conditions were superseded, Special Condition 4 was not included in this operating permit.



- Special Condition 5 required the permittee to dismantle a vapor degreaser and cease the use of 1,1,1-trichloroethane. Since the vapor degreaser has been dismantled, this permit condition is not included in the operating permit.

Construction Permit 0794-001, issued June 22, 1994

This permit was for the installation of the EMTEC Electro vap 150 Evaporator. The evaporator has been removed from service. Therefore, the special conditions of this construction permit were not included.

Construction Permit 0995-012, issued September 13, 1995

This permit was for the installation of Poly Adhesive Spray Booths 1 and 2.

- Special Condition 1 is a general condition regarding odors. This condition has not been added to the permit because of its redundancy with 10 CSR 10-6.165 which can be found in Section IV. Core Permit Requirements.

Construction Permit 0896-004, issued August 7, 1996

This permit was for the installation of Poly Adhesive Spray Booth 3.

- Special Condition 1 is a general condition regarding odors. This condition has not been added to the permit because of its redundancy with 10 CSR 10-6.165 which can be found in Section IV. Core Permit Requirements.

Construction Permit 072002-001, issued July 24, 2002

This permit authorized the increase of usage of coating material in the Aqueous Degrease Tank and the Electro Deposition Paint Machine.

- Special Condition 1 supersedes Special Conditions 1, 2, and 3 from Construction Permit 1193-009.
- Special Condition 2A through C limits VOC from EP02 and EP02B to below 40 tons per year and requires the installation to keep records. It has been added to this operating permit.

Construction Permit 072002-001A, issued March 13, 2015

This modification adds HAP SMAL limitations so that alternative coatings may be used at the installation.

- Special Condition 3A through F limits the total and individual HAPs from EP-02 and EP-02B and requires the installation to keep records. It has been added to this operating permit.

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

40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

The tanks at this installation are smaller in capacity than the applicable volumes listed in these subparts.

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart does not apply. The three Lochinvar Low Pressure Boilers all have a fuel heating content less than 10 MMBtu/hr.

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This subpart does not apply. The fire pump engine was constructed prior to the applicability date.

40 CFR Part 60, Subpart EE – *Standards of Performance for Surface Coating of Metal Furniture*

The installation produces only wood furniture; as a result this subpart does not apply.

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

40 CFR Part 63, Subpart JJ – *National Emission Standards for Wood Furniture Manufacturing Operations*

This subpart applies to the facility and has been incorporated into this permit. The installation does not perform finishing and uses neither foam nor contact adhesives as defined in this subpart. None of the materials, paints, solvents, etc., contain formaldehyde. If the permittee does these activities or uses materials containing formaldehyde, the installation may become subject to further requirements under this subpart.

40 CFR Part 63, Subpart RRRR – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture*

This subpart does not apply. The surface coating of metal components of wood furniture conducted in an operation that is subject to MACT JJ is exempt.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart applies to EP-20 and has been incorporated into this operating permit.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

This subpart does not apply. The boilers meet the definition of hot water heater which are exempt per §63.7491(d).

40 CFR Part 63, Subpart MMMM – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

This subpart does not apply to the installation because it is already subject to the requirements of 40 CFR Part 63, Subpart JJ, per §63.3881(c)(6).

40 CFR Part 63, Subpart CCCCCC – *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

This subpart does not apply. This subpart applies to area sources of HAPs; the installation is a major source of HAPs.

#### **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.

#### **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 while EP-01 uses a control device in order to achieve compliance with 10 CSR 10-6.400, it cannot reach the major source threshold uncontrolled.

#### **Greenhouse Gas Emissions**

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> emissions were not included within this permit. The applicant is required to report the data directly to EPA if subject. The public may obtain CO<sub>2</sub> emissions data for applicable installations by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

#### **Other Regulatory Determinations**

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

While this rule applies, it is unlikely that particulate matter will emit beyond La-Z-Boy's property line in any significant quantities due to the nature and location of its emission points. As a result, the monitoring and recordkeeping requirements of this condition have been removed from the Core Permit Requirements.

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

This rule applies. All natural gas-fueled equipment are exempt per 6.220(1)(L). The engine is exempt per 6.220(1)(A). Some equipment only emits indoors (and are not vented to the outdoors) and thus are exempt per 6.220(1)(O).

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

This rule applies. This rule was rescinded from the Missouri Code of State Regulations on November 30, 2015 but is still in the EPA approved SIP and is thus still an applicable federal requirement.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This rule applies to EP-20 (water pump engine) and has been applied within the permit. The other sulfur-emitting units are exempt from this rule due to being fueled solely by natural gas. Once 10 CSR 10-6.261 is incorporated into the SIP it will become a federal requirement and will no longer be just a State Only requirement.

**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

Comments were received by Leslye E. Werner of EPA Region 7 on October 19, 2017. The comments are addressed in the order in which they appear within the letter(s).

### **EPA Comment #1:**

Emission Limitation 2., in Permit Condition 002, requires the permittee to emit less than the respective SMAL for each individual HAP in any consecutive 12-month period from the electrodeposition coating operation (EP-02 and EP-02B). Additionally, Monitoring/Record keeping requirement 2., in Permit Condition 002, requires the permittee to maintain records of actual monthly and 12-month rolling total emissions of individual and combined HAP using B1 and B2 or an Air Pollution Control Program approved equivalent. The Air Pollution Control Program Table of Hazardous Air Pollutants Screening Action Modeling Levels and Risk Assessment Levels (SMAL) includes over two hundred (200) chemicals. Emission Limitation 2., and Monitoring/Record keeping Requirement 2., might be interpreted to mean that La-Z-Boy Midwest is required to limit each of the over 200 chemicals and therefore would be required to monitor and record monthly and 12-month consecutive totals. EPA believes this might be excessive and it is more appropriate to limit, monitor and record those HAPs applicable to the materials being used by La-Z-Boy Midwest.

### **MoDNR Response to Comment #1:**

Construction Permit 072002-001A was issued to allow the freedom to use alternative materials for EP-02 and EP-02B without the need to obtain new construction permits by limiting their HAPs to below de minimis levels. MoDNR cannot anticipate what individual HAPs out of the list of 200+ might be used at La-Z-Boy Midwest in the future; hence the sweeping SMAL limit rather than a limit tailored to each currently used HAP. The intention of the monitoring/recordkeeping requirements is not to track all 200+ HAPs, but to only track applicable HAPs being used at EP-02 and EP-02B. However, MoDNR agrees that this limit may be misunderstood and has modified Monitoring/Recordkeeping Requirement #2 of Permit Condition 002 for clarification to state tracking is required only for HAPs being used for EP-02 and EP-02B, not all HAPs.

### **EPA Comment #2:**

Section IV: *Core Permit Requirements* include 10 CSR 10-6.165: *Restriction of Emissions of Odors*. DNR notes that "This requirement is not federally enforceable." All applicable permit conditions incorporated into an operating permit issued by a state agency, pursuant to 40 CFR Part 70, are federally enforceable. However, applicable conditions can be State Only requirements or Local Only requirements. Restriction of emissions of odors is one of the State Only requirements and EPA suggests MDNR consider replacing the notation regarding federal enforceability in 10 CSR 10-6.165 with a notation that this is a "State Only Requirement."

### **MoDNR Response to Comment #2:**

The permit has been updated to state that 10 CSR 10-6.165 is a state only requirement in Section IV: *Core Permit Requirements*.

### **EPA Comment #3:**

Permit Condition 005 incorporates the requirements from 10 CSR 10-6.260 to emission unit EP-20, Firefighting water pump engine. MDNR notes that this is a "Federal Only requirement," yet, since 10 CSR

10-6.260 continues to be a requirement of the approved Missouri State Implementation Plan, it remains a MDNR enforceable requirement and therefore the "Federal Only requirement" notation should be removed.

**MoDNR Response to Comment #3:**

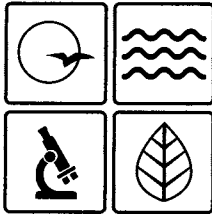
The permit has been updated removing the federal only requirement notation from 10 CSR 10-6.260 in Permit Condition 005.

**EPA Comment #4:**

Section IV: *Core Permit Requirements* includes 10 CSR 10-6.250: *Asbestos Abatement Projects-Certification, Accreditation, and Business Exemption Requirements* incorporating the Asbestos Hazard Emergency Response Act (AHERA) and its regulations for school districts and personnel working on asbestos activities in schools. The requirements associated with 10 CSR 10-6.250 have not been adopted into the EPA approved Missouri State Implementation Plan (SIP) and is therefore a "State Only Requirement," and EPA recommends MDNR consider adding a "State Only Requirement" designation to 10 CSR 10-6.250.

**MoDNR Response to Comment #4:**

The permit has been updated to state that 10 CSR 10-6.250 is a state only requirement in Section IV: Core Permit Requirements.



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

**NOV 29 2017**

Mr. Bill Snow  
La-Z-Boy Midwest  
4031 Howard Bush Drive  
Neosho, MO 64850

Re: La-Z-Boy Midwest, 145-0005  
Permit Number: OP2017-083

Dear Mr. Snow:

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:kwj

Enclosures

c: PAMS File: 2014-12-061



Recycled paper