STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 072007-005  Project Number: 2007-05-100
Parent Company: Manac Trailers USA, Inc.
Parent Company Address: 8593 Highway 77, Oran, MO 63771
Installation Name: Manac Trailers USA, Inc.
Installation Address: 1240 Riggs Street, PO Box 128, Kennett, MO 63857
Location Information: Dunklin County, S18, T28N, R13E

Application for Authority to Construct was made for:
Construction of a truck trailer manufacturing installation. Processes involved in the manufacturing include gas metal arc welding, shot blasting and surface coating operations. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

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

JUL 23 2007
EFFECTIVE DATE
STANDARD CONDITIONS:

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

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

You must notify the department’s Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

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

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

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

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

DEPARTMENT OF NATURAL RESOURCES

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

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

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

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

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

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

Manac Trailers USA, Inc.
Dunklin County, S18, T28N, R13E

1. Emission Limitation
   A. Manac Trailers USA, Inc. shall emit less than 40 tons of Volatile Organic Compounds (VOCs) from installation in any consecutive 12-month period.

   B. Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A). Manac Trailers USA, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in the trailer manufacturing.

   C. Manac Trailers USA, Inc. shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(B) indicate that the source exceeds the limitation of Special Conditions Number 1(A).

2. Operational Requirements
   Manac Trailers USA, Inc. shall keep the paints, primers and thinner solvents and cleaning solutions in sealed containers whenever the materials are not in use. Manac Trailers USA, Inc. shall provide and maintain suitable, easily read, permanent markings on all paints, primers, thinning solvents and cleaning solution containers used with this equipment.

3. Control Device – Booth Filtration System.
   The booth filtration system must be in use at all times when the spray and prime booths are in operation and shall be operated and maintained in accordance with the manufacturers’ specifications.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW
Project Number: 2007-05-100
Installation ID Number: 069-0076
Permit Number:

Manac Trailers USA, Inc. Complete: 5/21/2007
1240 Riggs Street, PO Box 128
Kennett, MO 63857

Parent Company:
Manac Trailers USA, Inc.
8593 Highway 77
Oran, MO 63771

Dunklin County, S18, T28N, R13E

REVIEW SUMMARY

• Manac Trailers USA, Inc. has applied for authority to construct a truck trailer manufacturing installation. Processes involved in the manufacturing include gas metal arc welding, shot blasting and surface coating operations.

• Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are Toluene (108-88-3), Methyl Alcohol (67-56-1), Methylisobutyl Ketone (108-10-1), Xylene (1330-20-7) and Ethyl Benzene (100-41-4).

• None of the New Source Performance Standards (NSPS) apply to the proposed equipment.

• None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations applies to the proposed equipment. Limiting VOC emissions to less than 40 tons per year indirectly limits emissions of hazardous air pollutants (HAPs) below major source threshold and hence no MACT applies.

• A booth filtration system will be used in association with the new equipment to control particulate matter less than ten (10) microns in diameter (PM\textsubscript{10}) emissions.

• This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of VOC are conditioned to less than de minimis levels.

• This installation is located in Dunklin County, an attainment area for all criteria air pollutants.

• This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table
2].

- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

PROJECT/INSTALLATION DESCRIPTION

Manac Trailers USA, Inc. is constructing a new truck trailer manufacturing installation in Dunklin County, Missouri. The operations involved in the manufacture of the truck trailers include gas metal arc welding, shot blasting and surface coating. These operations will emit HAPs and criteria pollutants in varying degrees as shown in Table 1.

The bulk of the emissions will be from the three pressurized drive-through side-down draft spray booths. The booths are equipped with 20” X 20” fiberglass paint arrestors for collection of paint overspray. The pressure drop across the arrestors is monitored using a manometer.

Three air make-up units (AMUs) will also be installed. Each unit has a heat input of 3.456 MMBTU/hr and will be fired with natural gas.

EMISSIONS/CONTROLS EVALUATION

A material balance approach was used in the analysis of PM$_{10}$, VOC and HAP emissions. For VOC and HAP-containing materials, the amount of pollutant emitted is assumed to be 100 percent of the amount of pollutant contained in the material, since no control device is used to remove or destroy the VOC or HAP in the exhaust stream.

Percentage of VOC and HAP by weight and densities of the coatings were determined from Material Safety Data Sheets (MSDS) provided by the applicant.

PM$_{10}$ emissions were evaluated based on the solids content of the primer and paint used and a transfer efficiency of 65%. A booth filtration system with a control efficiency of 95% is used in conjunction with the spray booths.

Emissions from the air make-up units (AMUs) were calculated based on emission factors from U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4, *Natural Gas Combustion* (7/98).


Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Since this is a new installation there are no existing actual emissions or existing potential emissions under construction permits. The applicant requested an installation-wide limit on VOC emissions of 40 tons per year.
to remain a de minimis source. The 40 ton per year VOC limit will indirect limit emissions of PM$_{10}$ and HAPs to below de minimis levels. Table 1 below provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Regulatory De Minimis Levels</th>
<th>Existing Potential Emissions</th>
<th>Existing Actual Emissions</th>
<th>Potential Emissions of the Application</th>
<th>New Installation Conditioned Potential</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>0.00</td>
<td>0.00</td>
<td>42.50</td>
<td>N/A*</td>
</tr>
<tr>
<td>SOx</td>
<td>40.0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.03</td>
<td>N/A</td>
</tr>
<tr>
<td>NOx</td>
<td>40.0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.10</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>0.00</td>
<td>0.00</td>
<td>1348.38</td>
<td>&lt;40.00</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>0.00</td>
<td>0.00</td>
<td>3.74</td>
<td>N/A</td>
</tr>
<tr>
<td>HAPs</td>
<td>10.0/25.0</td>
<td>0.00</td>
<td>0.00</td>
<td>36.82</td>
<td>N/A*</td>
</tr>
</tbody>
</table>

* Limiting VOC emissions to below 40 tons per year will indirectly limit PM$_{10}$ and HAP emissions to below their respective de minimis levels.

PERMIT RULE APPLICABILITY

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

APPLICABLE REQUIREMENTS

Manac Trailers USA, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

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

The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.

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

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

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

- Restriction of Emission of Odors, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

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

STAFF RECOMMENDATION

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

Maurice Chemweno
Environmental Engineer

Date
PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 17, 2007, received May 21, 2007, designating Manac Trailers USA, Inc. as the owner and operator of the installation.


- Material Safety Data Sheets (MSDS)
Attachment A - VOC Compliance Worksheet
Manac Trailers USA, Inc
Dunklin County, S18, T28N, R13E
Project Number: 2007-05-100
Installation ID Number: 069-0076
Permit Number:

This sheet covers the period from ____________ to ____________.

(month, year)  (month, year)

Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, Type)</td>
<td>Amount of Material Used (gallons)</td>
<td>Density (lbs/gal)</td>
<td>VOC Content (Weight %)</td>
<td>VOC Emissions (tons)</td>
</tr>
</tbody>
</table>

(b) Total VOC Emissions Calculated for this Month in tons:

(c) 12-Month VOC Emissions Total from Previous Month's Attachment A, in tons:

(d) Monthly VOC Emissions Total (b) from Previous Year's Attachment A, in tons:

(e) Current 12-month Total of VOC Emissions in tons: [(b) + (c) - (d)]

Instructions: Choose appropriate VOC calculation method for units reported.

(a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];
   2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
   3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5]

(b) Summation of [Column 5] in tons;

(c) 12-Month VOC emissions total (e) from last month's Attachment A, in tons;

(d) Monthly VOC emissions total (b) from previous year's Attachment A, in tons;

(e) Calculate the new 12-month VOC emissions total. A 12-Month VOC emissions total (e) of less than 40.0 tons indicates compliance.
Ms. Lisa Mills  
General Manager  
Manac Trailers USA, Inc.  
8593 Highway 77  
Oran, MO 63771

RE: New Source Review Permit - Project Number: 2007-05-100

Dear Ms. Mills:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please contact Maurice Chemweno or me with the department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your time and consideration.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH: mck

Enclosure

c:  Southeast Regional Office  
PAMS File 2007-05-100

Permit Number:
MANAC TRAILERS USA, Inc. 2007-05-100

**FOR SIGNATURE APPROVAL OF:**
- [ ] DNR Director
- [ ] DNR Deputy Director
- [ ] Division Director
- [ ] Division Deputy Director
- [x] Other: James L. Kavanaugh

**PROGRAM APPROVAL:** Approved by: ________________________________  Program: APCP  Date: ____________

Other Program Approval (Section/Unit): ________________________________  Date: ____________

Comments: ________________________________

**ROUTE TO:**
- [ ] DIVISION DIRECTOR APPROVAL: ________________________________ Date: ____________

Comments: ________________________________

- [ ] FINANCIAL REVIEW – DIVISION OF ADMINISTRATIVE SUPPORT:
  - DAS Director: ________________________________ Date: ____________
  - Fee Worksheet Received By: ________________________________ Date: ____________
    - Accounting: ________________________________ Date: ____________
    - Budget: ________________________________ Date: ____________
    - General Services: ________________________________ Date: ____________
    - Internal Audit: ________________________________ Date: ____________
    - Purchasing: ________________________________ Date: ____________

Comments: ________________________________

- [ ] LEGAL REVIEW:
  - General Counsel: ________________________________ Date: ____________
  - AGO: ________________________________ Date: ____________

Comments: ________________________________

- [ ] DEPARTMENT DIRECTOR APPROVAL: ________________________________ Date: ____________

Comments: ________________________________

- [ ] NOTARIZATION NEEDED

INITIALS/DATE