



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: 112012-004

Project Number: 2011-08-009
Installation Number: 201-0102

Parent Company: Manac Incorporated

Parent Company Address: 2275, 107e, Saint Georges, Quebec G5Y8G6

Installation Name: Manac Trailers USA, Incorporated

Installation Address: 8593 State Highway 77, Oran, MO 63771

Location Information: Scott County, S18, T28N, R13E

Application for Authority to Construct was made for:
Addition of a paint booth for the application of primer and topcoat for over-the-road truck trailers. 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.

NOV 15 2012

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

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

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

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

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

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

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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, Incorporated
Scott County, S18, T28N, R13E

1. **Superseding Condition**
The conditions of this permit supersede Special Condition 3. *Hazardous Air Pollutant (HAP) Emissions Limitation* found in the previous construction permit 0797-017 issued by the Air Pollution Control Program.
2. **Emission Limitation**
 - A. Manac Trailers USA, Incorporated shall emit less than 10.0 tons individually or 25.0 tons combined of Hazardous Air Pollutants (HAPs) in any consecutive 12-month period from the entire installation.
 - B. The entire installation includes all equipment/processes installed or permitted at Manac Trailers USA, Incorporated as of the effective date of this permit, including the new spray booth (EU-07).
 - C. Attachment A and Attachment B or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A.
3. **Capture Device Requirement – Paint Booth**
 - A. Manac Trailers USA, Incorporated shall use the paint booth as a total enclosure to capture emissions from the spray coating activities (EU-07). The spray coating activities shall consist of the operation of only one spray gun at a time.
 - B. Manac Trailers USA, Incorporated shall design and construct a spray booth (EU-07) having four complete walls or side curtains, and must be ventilated so that air is drawn into the booth. The walls of the booth may have doors to allow for ingress and egress of workers, but these doors shall remain closed during the coating process.

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SPECIAL CONDITIONS:

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

- C. Manac Trailers USA, Incorporated shall verify the proper operation of the ventilation system for the enclosure (EU-07) at least one time per calendar year (no less than nine calendar months and no more than 15 calendar months following the previous measurement) by performing a visual check using streamers, flags, smoke tubes, anemometers, or static pressure gauges.
4. Control Device Requirement – Overspray Collection System (Paint Booth Filters)
- A. Manac Trailers USA, Incorporated shall control particulate emissions from the spray gun using a paint booth (EU-07) equipped with an overspray collection system as specified in the permit application.
 - B. The overspray collection system shall be operated and maintained in accordance with the manufacturer's specifications. The overspray collection system shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources employees may easily observe them.
 - C. Replacement filters for the overspray collection system shall be kept on hand at all times. The filters shall have a control efficiency for total particulate of at least 98.5% per manufacturer's guarantee.
 - D. Manac Trailers USA, Incorporated shall monitor and record the operating pressure drop across the overspray collection system at least once every 7 calendar days. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. Manac Trailers USA, Incorporated shall maintain an operating and maintenance log for the overspray collection system which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

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SPECIAL CONDITIONS:

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

5. Record Keeping and Reporting Requirements
 - A. Manac Trailers USA, Incorporated 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 at the installation.
 - B. Manac Trailers USA, Incorporated shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2011-08-009
Installation ID Number: 201-0102
Permit Number:

Manac Trailers USA, Incorporated
8593 State Highway 77
Oran, MO 63771

Complete: August 1, 2011

Parent Company:
Manac Incorporated
2275, 107e
Saint Georges, Quebec G5Y8G6

Scott County, S18, T28N, R13E

REVIEW SUMMARY

- Manac Trailers USA, Incorporated has applied for the authority to install a new paint spray booth for the application of primer and topcoat in the manufacture of over-the-road truck trailers.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are xylene (all isomers).
- None of the New Source Performance Standards (NSPS) apply to the installation. 40 CFR 60 Subpart MM, *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations*, does not apply because the maximum applicable weight is 8500 pounds and a trailer typically weighs more than 10,000 pounds.
- 40 CFR 63, Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, does not apply to the installation because it is not a major source of HAPs.
- 40 CFR 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* applies because the painting of trailers is considered a mobile equipment spray-applied surface coating operation.
- 40 CFR 63, Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*, does not apply to this process because the paints do not contain the target HAPs.
- Paint booth filters are being used to control the particulate emissions from the paint spraying equipment.

- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.
- This installation is located in Scott County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- An application for an amendment to your Intermediate Operating Permit is required for this installation within 90 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Manac Trailers USA, Incorporated (Manac Trailers), formerly known as CPS Trailer Company, manufactures trailers for over-the-road hauling. The manufacture of trailers includes the following processes that generate emissions of air contaminants: gas metal arc welding, abrasive blasting, and surface coating. The following construction permits have been issued to Manac Trailers from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
0797-017	Retroactive construction permit for welding, blasting, and surface coating operations.

PROJECT DESCRIPTION

Manac Trailers has proposed to construct a new paint booth. At the time of permit issuance, Manac Trailers has not determined if they will construct a new building to house the paint booth (EU-07) or if they will convert a former trailer wash bay into a spray paint booth (EU-07). This construction permit would allow the construction of either proposal. The maximum design rate for the paint booth (EU-07) was based on the minimum processing time for painting one trailer with a full coat of primer and a full coat of paint. One trailer can be completed in 4 hours using a maximum of 4 gallons primer and 8 gallons paint. No additional paint preparation activities (such as masking, sanding, or drying) were factored into the minimum processing time.

EMISSIONS/CONTROLS EVALUATION

The spray booth (EU-07) will be equipped with 2 high volume low pressure (HVLP) air atomized spray guns operated inside of a total enclosure. The total enclosure is enclosed on all sides with doors to allow for ingress and egress of workers. Total enclosures completely surround the emissions from an emission unit and are assumed to capture 100% of the emissions. The spray booth is exhausted to a paint overspray panel with an expected control efficiency of 98.5% for total particulate matter according to the filter manufacturer's specifications.

Potential emissions of VOC and HAPs were calculated using a mass balance approach and assuming 100% emitted. Particulate emissions from the painting activities were calculated using a mass balance approach and assuming a 30% overspray. This overspray was based on the EPA document entitled, *Sources and Control of Volatile Organic Air Pollutants*, APTI Course 482, Third Edition (November 2002), which indicates that HVLP spray coating of large flat surfaces would typically achieve a 70% transfer efficiency. As there is not a particle size distribution available for this type of coating, all particulate matter was assumed to be particulate matter less than 2.5 microns in diameter (PM_{2.5}).

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year.) The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions ¹	Existing Actual Emissions (2010 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM _{2.5}	10.0	N/D	N/D	0.64	N/D
PM ₁₀	15.0	4.2	1.35	0.64	4.84
SO _x	40.0	0.00	0.00	N/A	N/A
NO _x	40.0	0.00	0.00	N/A	N/A
VOC	40.0	<99	11.14	32.10	<131.10
CO	100.0	0.00	0.00	N/A	N/A
Xylene	10.0	<9	N/D	3.99	<10
Combined HAPs	25.0	<24	N/D	4.57	<25

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

¹Existing potential emissions obtained from permit number 0797-017.

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 all pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

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

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

- *Maximum Achievable Control Technology (MACT) Regulations*, 40 CFR Part 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

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.

Kathi Jantz
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 29, 2011, received August 1, 2011, designating Manac Incorporated as the owner and operator of the installation.
- Southeast Regional Office Site Survey, dated August 12, 2011.
- Material Safety Data Sheets

Attachment A – Monthly Individual HAP Compliance Worksheet

Manac Trailers USA, Incorporated
 Scott County, S18, T28N, R13E
 Project Number: 2011-08-009
 Installation ID Number: 201-0102
 Permit Number: _____

HAP Name: _____ CAS No.: _____

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

Column 1	Column 2	Column 3	Column 4 (a)	Column 5 (b)
Material Used (Name)	Amount of Material Used (Include Units)	Density (Pounds per Gallon)	HAP Content (Weight %)	HAP Emissions (Tons)
(c) Total Individual HAP Emissions Calculated for this Month in Tons:				
(d) Last Month's 12-Month Individual HAP Emissions Total, in Tons:				
(e) Previous Year's Monthly Individual HAP Emissions Total, in Tons:				
(f) Current 12-month Total of Individual HAP Emissions in Tons: [(c) + (d) - (e)]				

Instructions: This worksheet must include HAP emissions from all emission units installed or permitted at the time of permit issuance. Complete a new worksheet for each individual HAP.

- (a) HAP content should be obtained from the Material Safety Data Sheet (MSDS) and should represent the total mass of the HAP compound by weight. If the content is given as a range, then the maximum value should be used.
- (b) 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];
- (c) Summation of [Column 5] in Tons;
- (d) 12-Month Individual HAP emissions (f) from last month's Attachment A in Tons;
- (e) Monthly Individual HAP emissions total (c) from the previous year's Attachment A in Tons; and
- (f) Calculate the new 12-month Individual HAP emissions total.

A 12-Month Individual HAP emissions total (f) of less than 10.0 tons for each individual HAP indicates compliance.

Attachment B - Monthly Combined HAPs Tracking Record

Manac Trailers USA, Incorporated
Scott County, S18, T28N, R13E
Project Number: 2011-08-009
Installation ID Number: 201-0102
Permit Number: _____

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

Column 1	Column 2	Column 3 (a)
Individual HAP Name	Individual HAP CAS number	Total Individual Monthly HAP emissions (tons)
(b) Total Combined HAP Emissions Calculated for this Month, in Tons:		
(c) Previous Month's 12-Month HAP Emissions Total, in Tons:		
(d) Previous Year's Monthly HAP Emissions Total, in Tons:		
(e) Current 12-month Total of HAP Emissions in Tons: [(b) + (c) - (d)]:		

Instructions: This worksheet must include HAP emissions from all emission units installed or permitted at the time of permit issuance. Obtain information for Column 1 and Column 2 and Column 3 from Attachment A

- (a) Record the total monthly individual HAP emissions total from (c) from the current month's Attachment A
- (b) Summation of [Column 3] in Tons;
- (c) Record the previous 12-Month combined HAP emission total (e) from last month's Attachment B, in Tons;
- (d) Record the monthly HAP emission total (b) from previously year's Attachment B, in Tons; and
- (e) Calculate the new 12-month combined HAP emissions total.

A 12-Month Combined HAP emissions total (e) of less than 25.0 tons indicates compliance.

Ms. Lisa Mills
General Manager
Manac Trailers USA, Incorporated
PO Drawer K
Oran, MO 63771

RE: New Source Review Permit - Project Number: 2011-08-009

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, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
Permit Section Chief

KBH:shl

Enclosures

c: Southeast Regional Office
PAMS File: 2011-08-009

Permit Number: