



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

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

NOV 13 2015

Mr. David Garcia
Maxion Wheels
3610 West Main Street
Sedalia, MO 65301

Re: Maxion Wheels, 159-0027
Permit Number: OP2015-049

Dear Mr. Garcia:

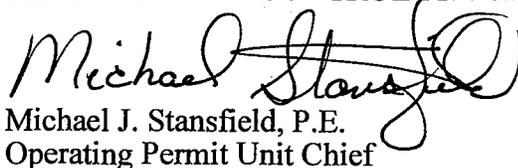
Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements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

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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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/te

Enclosures

c: ✓ PAMS File: 2008-05-041



INTERMEDIATE STATE 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 here in.

Intermediate Operating Permit Number: OP2015-049
Expiration Date: **NOV 13 2020**
Installation ID: 159-0027
Project Number: 2008-05-041

Installation Name and Address

Maxion Wheels
3610 West Main Street
Sedalia, MO 65301
Pettis County

Parent Company's Name and Address

Hayes-Lemmerz International, Inc.
39500 Orchard Place
Novi, MI 48167

Installation Description:

Maxion Wheels manufactures and finishes automotive wheels. The wheels are pressed, welded, cleaned, painted and baked. Maxion Wheels has the potential to emit Volatile Organic Compounds and Nitrogen Oxides at major levels but has accepted voluntary limitations to less than the major source thresholds to qualify for this Intermediate Operating Permit.

Prepared by:
Tandi Edelman
Operating Permit Unit

Director of Designee
Department of Natural Resources

NOV 13 2015

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Maxion Wheels manufactures and finishes automotive wheels. The wheels are pressed, welded, cleaned, painted and baked. Maxion Wheels has the potential to emit Volatile Organic Compounds and Nitrogen Oxides above the major level threshold. Maxion Wheels is not a named installation and fugitive emissions do not count toward major source applicability.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.6230	0.5847	0.3859	0.5001	0.4897
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.6118	0.5721	0.3789	0.00	0.000
Sulfur Oxides (SO _x)	0.0363	0.0352	0.0248	0.0268	0.0306
Nitrogen Oxides (NO _x)	6.1100	5.0350	4.1930	4.5480	5.1645
Volatile Organic Compounds(VOC)	46.5735	52.5217	37.4471	66.7696	65.9663
Carbon Monoxide (CO)	4.3378	4.1839	3.5221	3.8204	4.3383
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs) ¹	0.00	0.00	0.00	0.00	0.00
Ammonia (NH ₃)	0.00	0.00	0.00	0.00	0.00

¹ Note: HAP emissions reported as VOC or PM₁₀.

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EP01	Spray Paint Booth #1
EP02	Spray Paint Booth #2
EP14	E-Coat Dip Paint Tanks
EP28	Top Coat Booth
EP29	50 kW Diesel Emergency Generator

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. These emissions sources are subject to the plant wide emission limitations in Section II of this permit.

Description of Emission Source

EP03	Bake Oven #1
EP04	Bake Oven #2
EP12	Bake Oven #3
EP13	Phosphate System
EP15	E-Coat Bake Oven
EP16	Boiler #1
EP17	Boiler #2
EP24	Rim and Spider Wash #5
EP27	Miscellaneous Space Heaters
EP30	Welding

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 on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

PERMIT CONDITION PW1

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Lmitation(s)

Emission Limitation:

- 1) The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOC) in any consecutive twelve month period.
- 2) The permittee shall emit less than 100 tons of Nitrous Oxides (NO_x) in any consecutive twelve month period.

Monitoring:

The permittee shall monitor the VOC and NO_x emissions from the entire installation.

Recordkeeping:

- 1) The permittee shall maintain an accurate record of the VOC emissions. Attachment A, or an equivalent shall be used to demonstrate compliance with the emission limit.
- 2) The permittee shall maintain an accurate record of the NO_x emissions. Attachment B, or an equivalent shall be used to demonstrate compliance with the emission limit.
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month, if records indicate any exceedances of the limitations imposed by this permit.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW2

10 CSR 10-6.060 Construction Permits Required
Construction Permit #092013-002, Issued September 3, 2013

Emission Limitation:

- 1) The permittee shall emit less than 10 tons of a single Hazardous Air Pollutant (HAP) in any consecutive twelve month period. [Special Condition No. 2.A]
- 2) The permittee shall emit less than 25 tons of all combined HAPs in any consecutive twelve month period. [Special Condition No. 2.A]

Monitoring:

The permittee shall monitor the HAP emissions.

Recordkeeping:

- 1) The permittee shall maintain an accurate record of the individual HAP emissions and combined HAP emissions. Attachments C and D, or an equivalent shall be used to demonstrate compliance with the emission limit. [Special Condition No. 2.B]
- 2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request. [Special Condition No. 7.A]
- 3) All records shall be maintained for five years. [Special Condition No. 7.A]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month, if records indicate any exceedances of the limitations imposed by this permit. [Special Condition No. 7.B]
- 2) The permittee shall report any deviations from the requirements of this permit condition in the report and annual compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

Permit Condition 1	
10 CSR 10-6.060 Construction Permits Required Construction Permit #092013-002, Issued September 3, 2013	
Emission Unit	Description
EP28	Top Coat Booth
EP14	E-Coat Dip Paint Tanks

Operational Limitation:

- 1) The permittee shall operate the surface coating booth's exhaust fan(s) during all spray applied coating periods. [Special Condition No. 3]
- 2) The permittee shall control emissions from the two surface coating spray guns using a water curtain as specified in the permit application. [Special Condition No. 4.A]
- 3) The water curtain shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition No. 4.B]
- 4) Before using an alternative coating in the spray guns that differs from a material listed in the Application for Authority to Construct for Construction Permit No. 092013-002, the permittee shall calculate the potential emissions of all individual HAPs in the alternative material. [Special Condition No. 6.A]
- 5) The permittee shall see approval from the Air Pollution Control Program New Source Review Unit before use of the alternative material if the potential individual HAP emissions for the alternative material are greater than the screening model action level (SMAL) for any chemical listed in the Table of Hazardous Air Pollutants and Screening Model Action Levels located at <http://dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>, or if the total VOC emissions exceed 145.03 tons per year. [Special Condition No. 6.B]

Recordkeeping and Reporting:

- 1) The water curtain 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. The pressure drop shall be measured and recorded at least once every 24 hours. Periods when surface coating is non-operational shall be recorded. The pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition No. 4.C]
- 2) The water curtain pH shall be measured and recorded at least once every 24 hours. Periods when surface coating is non-operational shall be recorded. The pH shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition No. 4.D]
- 3) The permittee shall maintain a copy of the water curtain manufacturer's performance warranty on site. [Special Condition No. 4.E]
- 4) The permittee shall maintain an operating and maintenance log for the water curtain which shall include the following:

- a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
- b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition No. 4.F]
- 5) The permittee shall keep the coatings and solvents in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on coating and solvent containers used with this equipment. [Special Condition No. 5]
- 6) Attachment E or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to show compliance with Operation Limitation 4 and 5. [Special Condition No. 6.C]
- 7) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used. [Special Condition No. 7.A]
- 8) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten 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. [Special Condition No. 7.B]
- 9) The permittee shall report any deviations from the requirements of this permit condition in the report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 2	
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes	
Emission Unit	Description
EP01	Spray Booth #1
EP02	Spray Booth #2
EP28	Top Coat Booth

Operational Limitation:

The spray booths and water wash control systems (designed to control at least 95% of the particulate overspray) shall be operated and maintained in accordance with the manufacturer's recommendations. The water wash control system shall be operating whenever the paint booths are in use.

Monitoring:

The permittee shall inspect the spray booths and water wash control systems daily to ensure they are being operated according to the manufacturer's recommendations.

Recordkeeping:

Records of the nozzle and filter inspections, control equipment failures and any maintenance performed on the spray booths or the water wash control systems shall be maintained.

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 3	
40 CFR Part 63, Subpart A General Provisions and Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Unit	Description
EP29	50 kW Diesel Emergency Generator

Operational Limitations:

- 1) The permittee shall comply with the requirements in Table 2d below. [§63.6603\(a\)](#)

Table 2d to Subpart ZZZZ of Part 63. Requirements for Existing Compression Ignition Stationary RICE Located at Area Sources of HAP Emissions

For each...	You must meet the following requirement, except during periods of startup...	During periods of startup you must...
Emergency CI ²	<ul style="list-style-type: none"> a. Change oil and filter every 500 hours of operation or annually, whichever comes first¹; b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first¹; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. 	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

¹ Sources have 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 this subpart.

² If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

- 2) The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) 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\(e\)](#)
- 3) The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625\(f\)](#)

Recordkeeping:

The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to their own maintenance plan. §63.6655(e)

Reporting:

- 1) The permittee shall report each instance in which the permittee did not meet each emission limitation or operating limitation in Table 2d to this subpart that apply. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in § 63.6650. §63.6640(b)
- 2) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month, if records indicate any exceedances of the limitations imposed by this permit. [Special Condition No. 7.B]
- 3) The permittee shall report any deviations from the requirements of this permit condition in the report and annual compliance certification required by Section V of this permit.

Permit Condition 4 Backup Diesel Generator 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	
Emission Unit	Description
EP29	50 kW Diesel Emergency Generator

Emission Limitation:

The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour period.

Fuel Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
- 2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for five years.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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 on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions

constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170 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.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

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

Recordkeeping:

The permittee shall document all readings on Attachment F, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

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 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings 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.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.

- b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;

- b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(E)2 and §(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, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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 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 annual 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 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
- a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Willam Godall, Plant Manager. On January 13, 2015, the Air Pollution Control Program was informed that David Garcia, Plant Manager, is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (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,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(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

The following instructions and example tracking sheets provided in the attachments illustrate what is required to adequately demonstrate compliance with some of the terms of this permit. In order to demonstrate compliance with the Volatile Organic Compound (VOC) or Hazardous Air Pollutant (HAP) emission limits, the permittee must record the monthly VOC and HAP emissions and calculate maintain the 12-month rolling totals emitted from the respective processes. For plant-wide emission limits, the records must also include all sources of emissions of the limited pollutant located at the facility.

Coating Operations:

- Throughput shall equal the total amount of coatings and solvents used or added to the system.
- If the VOC an HAP content of the coatings and solvents (as applied) are known, that value should be used in the emission calculation for compliance demonstration. The same applies to the coatings and solvent densities. The source of these values shall be produced upon request during an ACP inspection for verification.
- If the density of the coating or solvent used for the calculation is taken from the product supplier's Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) and the values are provided in a range, the number to be used in the calculation shall be the highest value reported. Other verifiable data sources may be used if produced upon inspection.
- If the VOC or HAP content (wt%) is taken from the supplier MSDS or SDS and the data sheets provide a range of values, the VOC or HAP content shall be the highest weight percentage value reported.
- The following calculation method will be used to determine the emission amounts:

VOC Emitted =

$$[Usage (gallons)] \times [Coating Density \left(\frac{lbs}{gal}\right)] \times [VOC content (wt. \%)] \times \left[\frac{ton}{2000 lbs}\right]$$

Fuel Combustion:

- The total amount of each type of fuel combusted shall be calculated as the throughput.
- Combustion sources with the same SCC code can combine throughputs for emission tracking purposes. (As long as different emission rates have not been established.)
- Emission factors shall be taken from the appropriate section of EPA's AP-42, or the most recent stack testing results (if performed).

$$\text{Pollutant Emitted (tons)} = [\text{Fuel Usage}] \times \left[\text{Emission Factor} \left(\frac{\text{lbs of pollutant}}{\text{fuel unit}} \right) \right]$$

Supplemental Recordkeeping:

All MSDS and SDS sheets or other records used for the basis of compliance calculations shall be kept on site or readily available for Missouri Department of Natural Resources upon request.

- 1.) ¹VOC Emissions (tons) from surface coating = Amount of Material Used (gal) x Density (lb/gal) x VOC Content (wt%) x 0.0005 (ton/lb).
- 2.) ²VOC Emissions (tons) from natural gas = Amount Combusted (MMscf) x Emission Factor (lb/MMscf) x 0.0005 (ton/lb).
- 3.) ³VOC (tons) from propane = Amount Combusted (1000 Gallons) x Emission Factor (lb/1000 Gallons) x 0.0005 (ton/lb).
- 4.) ⁴VOC (tons) from liquefied petroleum gas = Amount Combusted (1000 Gallons) x Emission Factor (lb/1000 Gallons) x 0.0005 (ton/lb).
- 5.) ⁵Monthly VOC Emissions (tons) = the sum of surface coating VOC Emissions (tons) + natural gas VOC Emissions (tons).
- 6.) ⁶12-month Rolling Total VOC Emissions (tons) = the sum of this month's Monthly VOC Emissions (tons) + the previous 11 months' Monthly VOC Emissions (tons).

A 12-month VOC Emissions total less than 100.00 tpy demonstrates compliance with Permit Condition PW1.

**Attachment B
Plantwide Monthly NOx Tracking Record**

Emission Source	Amount Combusted during month	Units of Fuel	Emission Factor	Emission Factor Units	NO _x Emissions from Fuel Combustion (tons)
Natural Gas ¹		MMscf	100	lb/MMscf	
Propane ²		1000 Gallons	19	lb/1000 Gallons	
Sum of this Month's NOx Emissions ³ (tons):					
Sum of Previous 11 Months Total NOx Emissions ⁴ (tons):					
Sum of this Month's NOx Emissions and Previous 11 Months Total NOx Emissions ⁵ (tons):					

- 1.) ¹NO_x Emissions (tons) from natural gas = Amount Combusted (MMscf) x Emission Factor (lb/MMscf) x 0.0005 (ton/lb).
- 2.) ²NO_x (tons) from propane = Amount Combusted (1000 Gallons) x Emission Factor (lb/1000 Gallons) x 0.00005 (ton/lb).
- 3.) ³Sum of NO_x emissions from both Natural Gas and Propane combustion.
- 4.) ⁴Sum of the previous 11 months' monthly NO_x emissions (tons) from Natural Gas and Propane combustion.
- 5.) ⁵Sum of this month and previous 11 months NO_x emissions.

A 12-month NO_x Emissions total less than 100.00 tpy demonstrates compliance with Permit Condition PW1.

Attachment E
EP-28 Alternative Coating Compliance Worksheet

Coating or material name _____ Date _____ Copy this sheet as needed.

A	B	C	D	E	F	G	H	I	J
Process and Emission Unit	Individual HAP Name and CAS No.	HAP is also Particulate Matter (yes / no)	Individual HAP Content (max weight %)	Maximum Hourly Application Rate (lbs coating per hour)	Overall PM Transfer and Control Efficiency (%)	Individual HAP PTE (tpy)	Individual HAP SMAL (tpy)	Coating VOC (weight %)	Coating VOC PTE (tpy)
<i>(Example) EP-28</i>	<i>Benzene 71-43-2</i>	<i>no</i>	<i>2.0%</i>	<i>75.95</i>	<i>N/A</i>	<i>6.65</i>	<i>2.0</i>	<i>36.61%</i>	<i>121.79</i>
<i>(Example) EP-28</i>	<i>Cobalt 2-Ethylhexanoate 136-52-7</i>	<i>yes</i>	<i>0.5%</i>		<i>96.59%</i>	<i>0.06</i>	<i>0.1</i>		

- A. Record the process description and emission unit.
- B. Record the all individual HAPs from this single coating/material MSDS.
- C. Compare the HAP to <http://dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf> for verification as particulate matter.
- D. Record the maximum weight percent of each HAP from the MSDS.
- E. Calculate the coating's maximum hourly application rate (lb/hr) by multiplying the coating density (lb/gal) by the MHDR of 7.0 gal/hr. Seek approval from the Air Pollution Control Program New Source Review Unit if the new MHDR will exceed 7.0 gal/hr.
- F. The overall PM transfer and control efficiency includes the transtech transfer efficiency (65%), booth capture efficiency (95%), and water curtain control efficiency (95%): $65\% + (1 - 65\%) \times 90.25\% = 96.59\%$
- G. Calculate the particulate matter HAP potential to emit: $G = D \times E \times (1 - F) \times 8,760 / 2,000$. Otherwise calculate the volatile HAP potential to emit: $G = D \times E \times 8,760 / 2,000$.
- H. Record the individual HAP SMAL from <http://dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>. If the individual HAP potential to emit is greater than or equal to the respective SMAL seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.
- I. Record or calculate the coating's VOC weight % from the MSDS.
- J. Calculate the VOC potential to emit: $J = E \times I \times 8,760 / 2,000$. If the VOC potential to emit is greater than or equal to 145.03 tons per year seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.

Appendix A
Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MW megawatt
acfm actual cubic feet per minute	MHDR maximum hourly design rate
BACT Best Available Control Technology	MMBtu Million British thermal units
BMPs Best Management Practices	MMCF million cubic feet
Btu British thermal unit	MSDS Material Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQS ... National Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_x nitrogen oxides
CFR Code of Federal Regulations	NSPS New Source Performance Standards
CO carbon monoxide	NSR New Source Review
CO₂ carbon dioxide	PM particulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppm parts per million
dscf dry standard cubic feet	PSD Prevention of Significant Deterioration
EQ Emission Inventory Questionnaire	PTE potential to emit
EP Emission Point	RACT Reasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCC Source Classification Code
fps feet per second	scfm standard cubic feet per minute
ft feet	SIC Standard Industrial Classification
GACT Generally Available Control Technology	SIP State Implementation Plan
GHG Greenhouse Gas	SMAL Screening Model Action Levels
gpm gallons per minute	SO_x sulfur oxides
gr grains	SO₂ sulfur dioxide
GWP Global Warming Potential	tph tons per hour
HAP Hazardous Air Pollutant	tpy tons per year
hr hour	VMT vehicle miles traveled
hp horsepower	VOC Volatile Organic Compound
lb pound	
lbs/hr pounds per hour	
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received May 14, 2008;
- 2) 2014 Emissions Inventory Questionnaire, received April 24, 2015; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not 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 10-6.220 Restriction of Emission of Visible Air Contaminants

The combustion of natural gas and propane is not expected to contribute any opacity. The paint particulate emissions will be controlled using the unit specific conditions for 10 CSR 10-6.400.

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

This rule applies to any installation that is an emission source of sulfur compounds except combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2. or liquefied petroleum gas as defined by American Society for Testing and Materials, or any combination of these fuels. (10 CSR 10-6.260(1)(A)2.)

The bake ovens (EP03, 04, 12, and 15) and the boilers (EP16 and 17) use both natural gas and liquefied propane gas. These units are not subject to 10 CSR 10-6.260.

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating

This rule applies to installations in which fuel is burned for the primary purpose of producing steam, hot water, or hot air or other indirect heating of liquids, gases, or solids and, in the course of doing so, the products of combustion do not come into direct contact with process materials.

An emission unit fueled by landfill gas, propane, natural gas, fuel oils #2 through #6 (with less than one and two tenths percent (1.2%) sulfur), and/or other gases (with hydrogen sulfide levels less than or equal to four (4) parts per million volume as measured using ASTM D4084, or equivalent and mercury concentrations less than forty (40) micrograms per cubic meter as measured using ASTM D5954, or ASTM D6350, or equivalent) would be deemed in compliance with 10 CSR 10-6.405. (10 CSR 10-6.405(1)(C))

All the indirect heating units burn natural gas or propane, so they are deemed to be in compliance with 10 CSR 10-6.405.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

0483-003	February 17, 1983	Permitted Spray Booth #1, superseded by 0389-007.
0389-007	January 18, 1989	Permitted Spray Booths #2 & #3 and increased throughput of Spray Booth #1. This permit also permitted associated conveyors, washers, and ovens, the plant wide limit in 012001-015 supersedes the coating limit in 389-007. The application for this Operating Permit stated these three spray booths were removed in December 2007.
062000-020	June 7, 2000	Permitted three spray paint booths, one paint applicator and one oven, superseded by 012001-015
012001-015	January 19, 2001	Permitted two paint booths and one bake oven, superseded by 012001-015A
012001-015A	December 20, 2006	Amended permit no. 012001-015 to include installation wide HAPs limit to avoid NESHAP Subpart M, effective January 2, 2007. HAP emission limits superseded by 092013-002
092013-002	September 3, 2013	Permitted spray applied top-coating emission point, supersedes HAP emission limit in 012001-015A.

Emission Unit Name Modifications

During the technical review of the application and draft names of the emission units were modified to match the names in use at the facility.

Emission Point	Emission Unit Names Used at Facility and in Operating Permit	Emission Unit Names Used in Application
EP01	Spray Paint Booth #1	SPRAY PAINT BOOTH #1 (new)
EP02	Spray Paint Booth #2	SPRAY PAINT BOOTH #3 (new)
EP03	Bake Oven #1	reconstructed bake oven 1 for spray booth 4
-	Dismantled Unit ¹	Spray Booth #2
EP04	Bake Oven #2	bake oven for spray booth 2 and old spray paint booth 3
EP12	Bake Oven #3	new bake oven 1 for spray booth 1 and 3 (2 burners at 6.4MMBtu/hr)
EP13	Phosphate System	Phosphate System
EP14	E-Coat Dip Paint Tanks	E-Coat Dip Paint Tanks
EP15	E-Coat Bake Oven	E-Coat Bake Oven
EP16	Boiler #1	Boiler #1
EP17	Boiler #2	Boiler #2
-	Dismantled Unit ¹	RIM & SPIDER WASH #3
EP24	Rim & Spider Wash #5	RIM & SPIDER WASH #5
-	Dismantled Unit ¹	RIM & SPIDER WASH #6
-	Dismantled Unit ¹	RIM & SPIDER WASH #7
EP27	Miscellaneous Space Heaters	Miscellaneous Space Heaters
EP28	Top Coat Booth	Top Coat Booth
EP29	50 kW Diesel Emergency Generator	50 kW Diesel Emergency Generator
EP30	Welding	Welding

¹ Unit was marked as dismantled on 2013 EIQ

New Source Performance Standards (NSPS) Applicability

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

The provisions of this subpart applies to steam generating units for which construction, modification, or reconstruction is commenced after June 9, 1989 and has a maximum design heat capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less but greater than or equal to 2.9 MW (10 MMBtu/h).

EP16 and EP17 Boilers #1 and #2 were constructed in 1978. This construction date is prior to June 9, 1989 and the boiler units are not subject to this subpart.

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 provisions of this subpart applies to each storage vessel with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction,

reconstruction, or modification is commenced after July 23, 1984. This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

A #2 Distillate Oil Storage Tank (20,000 gallons) has been removed from the site. The coating dip tanks are flow-through process. Kb does not apply to the installation.

Maximum Achievable Control Technology (MACT) Applicability

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

§ 63.6585 Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

The 50kW emergency generator is subject to Subpart ZZZZ and has been applied in Permit Condition 3.

40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

The provisions of this subpart apply to industrial, commercial, and institutional boilers and process heaters located at major sources of hazardous air pollutants (HAP).

This facility's potential to emit for HAPs is below major levels making it an area source. This subpart does not apply to this facility.

40 CFR Part 63, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources

The provisions of this subpart apply to industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

§ 63.11195 Are any boilers not subject to this subpart?

The types of boilers listed in paragraphs (a) through (g) of this section are not subject to this subpart and to any requirements in this subpart.

(e) A gas-fired boiler as defined in this subpart.

§ 63.11237 What definitions apply to this subpart?

Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

The boiler units (EP16 and EP17) combust natural gas or propane. Subpart JJJJJ is not applicable to this facility.

40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

The provisions of this subpart apply to area sources involved in any paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, or spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or

product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

No assembled motor vehicles are painted and none of the coatings used on the wheels contain the target HAPs: compounds of chromium, lead, manganese, nickel or cadmium. Subpart HHHHHH does not apply to this facility.

40 CFR Part 63, Subpart XXXXXX - *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

The provisions of this subpart apply to an area source that is primarily engaged in the operations in one of the nine source categories. The nine source categories are; Electrical and Electronic Equipment Finishing Operations, Fabricated Metal Products, Fabricated Plate Work (Boiler Shops), Fabricated Structural Metal Manufacturing, Heating Equipment, except Electric, Industrial Machinery and Equipment Finishing Operations, Iron and Steel Forging, Primary Metal Products Manufacturing, and Valves and Pipe Fittings.

Maxion Wheels makes rims, automotive, truck, and bus wheel manufacturing which is not one of the nine metal fabrication and finishing source categories covered by Subpart XXXXXX. Subpart XXXXXX does not apply to this facility.

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.

Greenhouse Gas Emissions

Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 36,846.4 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)¹
CO	55.78
CO ₂ e	36846.4
HAP	10.03
NO _x	148.95
PM ₁₀	80.66
PM _{2.5}	80.55
SO _x	7.74
VOC	354.22

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation. The boiler and bake ovens are able to run on Natural Gas or Propane; the higher potential emission from each fuel was used in the installation PTE.

Other Regulatory Determinations

Maxion Wheels' HAP designation as a Major Source was originally instituted due to PTE calculations for Methyl Ethyl Ketone (MEK), Ethylene Glycol Mono Butyl Ether (EGMBE) and Isomers of xylene. Both EGMBE and MEK have been removed from the list of HAPs in Section 112r of the Clean Air Act (November 29, 2004 and December 19, 2005, respectively). Since these compounds have been delisted Maxion Wheels' potential to emit for HAPs is below threshold levels and is an area source for HAP emissions.

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 Air Pollution Control Program'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

The permit draft went on Public Notice from November 16, 2012 to December 21, 2012 and no comments were received.

