

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

## PART 70

# PERMIT TO OPERATE

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

**Operating Permit Number:** OP2017-023  
**Expiration Date:** MAR 13 2022  
**Installation ID:** 155-0045  
**Project Number:** 2016-05-075

**Installation Name and Address**

M-D Building Products, Inc.  
665 Gettings Lane  
Hayti, MO 63851  
Pemiscot County

**Parent Company's Name and Address**

M-D Building Products, Inc.  
4041 N. Santa Fe  
Oklahoma City OK, 73118

**Installation Description:**

M-D Building Products, Inc. makes and finishes aluminum extrusions to customer specifications. The aluminum extrusions produced by the installation include components for doors, windows, and recreational vehicles as well as other miscellaneous aluminum products. The facility contains extrusion, anodizing, painting, fabricating, remelting, and billet casting operations. The installation is a major source of Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), and Xylene (1330-20-7). This facility is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.

Prepared by  
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Operating Permit Unit

Director of Designee  
Department of Natural Resources

MAR 13 2017

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

<b>Emission Unit</b>	<b>Description</b>	<b>Date of Construction/Installation</b>
EP-03	Billet Oven 5	1970
EP-10	Electrostatic Paint Spraying	1993
EP-10A	Paint Liner Washer	1993
EP-10B	Paint Line Dry Off Oven	1993
EP-10C	Paint Line Bake Oven	1993
EP-12	Paint Hook Bake-Off Oven	1998

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<b>Emission Unit</b>	<b>Description</b>	<b>Date of Construction/Installation</b>
EP-05	Heat Treat Oven 5	2008
EP-06	Heat Treat Oven 7	1970
FU-2	Billet Sawing	--

## **II. Plant Wide Emission Limitations**

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

None.

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 001</b>		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart M – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products		
<b>Emission Unit</b>	<b>Description</b>	<b>Control Device</b>
EP-10	Electrostatic Paint Spraying	CD-3 Fabric Filter

#### Emission Limitations:

- For an existing affected source, the permittee shall limit organic HAP emissions to the atmosphere from the affected source to the applicable limit in §63.3890(b)(1), determined according to the requirements in §63.3941 or §63.3951. [§63.3890(b)]
  - For each existing general use coating affected source, limit organic HAP emission to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period. [§63.3890(b)(1)]

#### Compliance Options:

- The permittee shall include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.3890. To make this determination, the permittee shall use at least one of the three compliance options listed in §63.3891(a) through (c). The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee shall document this switch as required by §63.3930(c), and the permittee shall report it in the next semi-annual compliance report required in §63.3920. [§63.3891]
  - Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee shall meet all the requirements of §§63.3941 and 63.3942 to demonstrate compliance with the applicable emission limit using this option. [§63.3891(a)]
  - Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee shall meet all the requirements of §§63.3951 and 63.3952 to demonstrate compliance with the emission limit using this option. [§63.3891(b)]

## **Compliant Material Option**

### **General Requirements:**

1. The permittee shall be in compliance with the emission limitations as specified in §63.3900(a)(1).  
[§63.3900(a)]
  - a) Any coating operation(s) for which the permittee uses the compliant material option, as specified in §63.3891(a), shall be in compliance with the applicable emission limit in §63.3890 at all times. [§63.3900(a)(1)]
2. The permittee shall always operate and maintain the affected source, including all air pollution control and monitoring equipment the permittee uses for purposes of compliance, according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]

### **Compliance Requirements:**

1. The permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The permittee shall use the emission rate without add-on controls option for any coating operation in the affected source for which the permittee does not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations shall use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and shall use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. The permittee shall conduct a separate initial compliance demonstration for each general use coating operation. The permittee shall meet all the requirements of §63.3941. Use the procedures in §63.3941 on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. The permittee does not need to re-determine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that the permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which the permittee uses the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. [§63.3941]
  - a) *Determine the mass fraction of organic HAP for each material used.* The permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the following options:  
[§63.3941(a)]
    - i) *Method 311 (Appendix A to 40 CFR Part 63).* The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the following procedures when performing a Method 311 test: [§63.3941(a)(1)]
      - (1) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the permittee does not have to count it. Express the mass fraction of each organic HAP the permittee counts as a value truncated to four places after the decimal point (e.g., 0.3791). [§63.3941(a)(1)(i)]
      - (2) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763). [§63.3941(a)(1)(ii)]

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- ii) *Method 24 (Appendix A to 40 CFR Part 60)*. For coatings, the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may use the alternative method contained in Appendix A to Subpart PPPP of Part 63, rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in Appendix A to Subpart PPPP of Part 63, as a substitute for the mass fraction of organic HAP. [§63.3941(a)(2)]
  - iii) *Alternative method*. The permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(a)(3)]
  - iv) *Information from the supplier or manufacturer of the material*. The permittee may rely on information other than that generated by the test methods specified in §63.3941(a)(1) through (3), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the permittee does not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to §63.3941(a)(1) through (3), then the test method results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(4)]
  - v) *Solvent blends*. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 of Part 63, Subpart MMMM. If the permittee uses the tables, the permittee shall use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and the permittee may use Table 4 only if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4 of Part 63, Subpart MMMM, the Method 311 results will take precedence unless, after consultation, the permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(5)]

**Table 3 to Subpart MMMM of Part 63 – Default Organic HAP Mass Fraction for Solvents and Solvent Blends**

Solvent/Solvent Blend	CAS. No.	Average Organic HAP Mass Fraction	Typical Organic HAP, wt%
Toluene	108-88-3	1.0	Toluene
Xylene(s)	1330-20-7	1.0	Xylenes, Ethylbenzene
Hexane	110-54-3	0.5	n-Hexane
n-Hexane	110-54-3	1.0	n-Hexane
Ethylbenzene	100-41-4	1.0	Ethylbenzene
Aliphatic 140	--	0	None
Aromatic 100	--	0.02	1% Xylene, 1% Cumene
Aromatic 150	--	0.09	Naphthalene
Aromatic Naphtha	64742-95-6	0.02	1% Xylene, 1% Cumene
Aromatic Solvent	64742-94-5	0.1	Naphthalene
Exempt Mineral Spirits	8032-32-4	0	None
Ligroines (VM&P)	8032-32-4	0	None
Lactol Spirits	64742-89-6	0.15	Toluene
Low Aromatic White Spirit	64772-82-1	0	None
Mineral Spirits	64742-88-7	0.01	Xylenes
Hydrotreated Naphtha	64742-48-9	0	None
Hydrotreated Light Distillate	64742-47-8	0.001	Toluene
Stoddard Solvent	8052-41-3	0.01	Xylenes
Super High-Flash Naphtha	64742-95-6	0.05	Xylenes
Varsol <sup>®</sup> Solvent	8052-49-3	0.01	0.5% Xylenes, 0.5% Ethylbenzene
VM&P Naphtha	64742-89-8	0.06	3% Toluene, 3% Xylene
Petroleum Distillate Mixture	6877-31-6	0.08	4% Naphthalene, 4% Biphenyl

**Table 4 to Subpart MMMM of Part 63 – Default Organic HAP Mass Fraction for Petroleum Solvent Groups<sup>a</sup>**

Solvent Type	Average Organic HAP Mass Fraction	Typical Organic HAP, wt%
Aliphatic <sup>b</sup>	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene
Aromatic <sup>c</sup>	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene

<sup>a</sup>Use this table only if the solvent blend does not match any of the solvent blends in Table 3 to Part 63, Subpart MMMM by either solvent blend name or CAS number and the permittee only knows whether the blend is aliphatic or aromatic.

<sup>b</sup>Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

<sup>c</sup>Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

- b) *Determine the volume fraction of coating solids for each coating.* The permittee shall determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the



supplier or the manufacturer of the material, or by calculation, as specified in §63.3941(b)(1) through (4). If test results obtained according to §63.3941(b)(1) do not agree with the information obtained under §63.3941(b)(3) or (4), the test results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(b)]

- i) *ASTM Method D2697–86 (Reapproved 1998) or ASTM Method D6093–97 (Reapproved 2003)*. The permittee may use ASTM Method D2697–86 (Reapproved 1998), “Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings” (incorporated by reference, see §63.14), or ASTM Method D6093–97 (Reapproved 2003), “Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer” (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.3941(b)(1)]
- ii) *Alternative method*. The permittee may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(b)(2)]
- iii) *Information from the supplier or manufacturer of the material*. The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.3941(b)(3)]
- iv) *Calculation of volume fraction of coating solids*. The permittee may determine the volume fraction of coating solids using Equation 1 of §63.3941: [§63.3941(b)(4)]

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad \text{Equation 1}$$

Where:

$V_s$  = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{\text{volatiles}}$  = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in Appendix A of 40 CFR Part 60, grams volatile matter per liter coating.

$D_{\text{avg}}$  = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 test results and other information sources, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

- c) *Determine the density of each coating*. Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475–98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(c)]

- d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of §63.3941: [§63.3941(d)]

$$H_c = \frac{(D_c)(W_c)}{V_c} \quad \text{Equation 2}$$

Where:

$H_c$  = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

$D_c$  = Density of coating, kg coating per liter (gal) coating, determined according to §63.3941(c).

$W_c$  = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to §63.3941(a).

$V_s$  = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to §63.3941(b).

- e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period shall be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period shall contain no organic HAP, determined according to §63.3941(a). The permittee shall retain all records required by §§63.3930 and 63.3931. [§63.3941(e)]
2. For each compliance period to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, is the end of a compliance period consisting of that month and the preceding 11 months. [§63.3942(a)]

**Recordkeeping:**

1. The permittee shall collect and retain records of the data and information specified in §63.3930. Failure to collect and retain these records is a deviation from the applicable standard. [§63.3930]
- a) A copy of each notification and report that the permittee submitted to comply with Part 63, Subpart MMMM, and the documentation supporting each notification and report. [§63.3930(a)]
- b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee shall retain a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee shall retain the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
- c) For each compliance period, the following records: [§63.3930(c)]
- i) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used. [§63.3930(c)(1)]
- ii) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941. [§63.3930(c)(2)]
- d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material

- option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
- e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
  - f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
  - g) The permittee shall retain records of the date, time, and duration of each deviation. [§63.3930(j)]
2. The records shall be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
  3. As specified in §63.10(b)(1), the permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
  4. The permittee shall retain each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may retain the records off-site for the remaining three years. [§63.3931(c)]

**Reporting:**

1. *Semi-annual compliance reports.* The permittee shall submit semi-annual compliance reports for each affected source according to the requirements of §63.3920(a)(1) through (5). The semi-annual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in §63.3920(a)(2). [§63.3920(a)]
  - a) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee shall prepare and submit each semi-annual compliance report according to the dates specified in §63.3920(a)(1)(iv). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(1)]
    - i) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A), the permittee shall submit the first and subsequent compliance reports according to the dates the permitting authority has established. [§63.3920(a)(1)(iv)]
  - b) *Inclusion with Title V report.* Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 shall report all deviations as defined in Part 63, Subpart M in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If an affected source submits a semi-annual compliance report pursuant to this section along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semi-annual compliance report includes all required information concerning deviations from any emission limitation in Part 63, Subpart M, its submission will be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a semi-annual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]
  - c) *General requirements.* The semi-annual compliance report shall contain the information specified in §63.3920(a)(3)(i) through (iv), and the information specified in §63.3920(a)(4) and (5) that is applicable. [§63.3920(a)(3)]
    - i) Company name and address. [§63.3920(a)(3)(i)]

- ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3920(a)(3)(ii)]
- iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30 or December 31. Note that the information reported for each of the six months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
- iv) Identification of the compliance option or options specified in §63.3891 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option the permittee used. [§63.3920(a)(3)(iv)]
- d) *No deviations.* If there were no deviations from the emission limitations in §63.3890 that apply, the semi-annual compliance report shall include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- e) *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semi-annual compliance report shall contain the following information: [§63.3920(a)(5)]
  - i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [§63.3920(a)(5)(i)]
  - ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports). [§63.3920(a)(5)(ii)]
  - iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports). [§63.3920(a)(5)(iii)]
  - iv) A statement of the cause of each deviation. [§63.3920(a)(5)(iv)]

### **Emission Rate Without Add-On Controls Option**

#### **General Requirements:**

1. The permittee shall be in compliance with the emission limitations in this subpart as specified in §63.3900(a)(1). [§63.3900(a)]
  - a) Any coating operation(s) for which the permittee uses the emission rate without add-on controls option, as specified in §63.3891(b), shall be in compliance with the applicable emission limit in §63.3890 at all times. [§63.3900(a)]
2. The permittee shall always operate and maintain the affected source, including all air pollution control and monitoring equipment the permittee uses for purposes of complying with Part 63, Subpart MMMM, according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]

#### **Compliance Requirements:**

1. The permittee may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The permittee shall use the compliant material option for any coating operation in the affected source for which the permittee does not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or

group of coating operations shall meet the applicable emission limit in §63.3890. The permittee shall conduct a separate initial compliance demonstration for each general use coating operation. The permittee shall meet all the requirements of §63.3951. When calculating the organic HAP emission rate according to §63.3951, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which the permittee uses the compliant material option. The permittee does not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that the permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which the permittee uses the emission rate without add-on controls option. If the permittee uses coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. [§63.3951]

- a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a): [§63.3951(a)]
  - i) *Determine the mass fraction of organic HAP for each material used.* The permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the following options: [§63.3941(a)]
    - (1) *Method 311 (Appendix A to 40 CFR Part 63).* The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the following procedures when performing a Method 311 test: [§63.3941(a)(1)]
      - (a) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the permittee does not have to count it. Express the mass fraction of each organic HAP the permittee counts as a value truncated to four places after the decimal point (*e.g.*, 0.3791). [§63.3941(a)(1)(i)]
      - (b) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (*e.g.*, 0.763). [§63.3941(a)(1)(ii)]
    - (2) *Method 24 (Appendix A to 40 CFR Part 60).* For coatings, the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may use the alternative method contained in Appendix A to Subpart P of Part 63, rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in Appendix A to Subpart P of this part, as a substitute for the mass fraction of organic HAP. [§63.3941(a)(2)]
    - (3) *Alternative method.* The permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(a)(3)]

- (4) *Information from the supplier or manufacturer of the material.* The permittee may rely on information other than that generated by the test methods specified in §63.3941(a)(1) through (3), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the permittee does not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to §63.3941(a)(1) through (3), then the test method results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(4)]
- (5) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which shall be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to Part 63, Subpart M. If the permittee uses the tables, the permittee shall use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and the permittee may use Table 4 only if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4 to Part 63, Subpart M, the Method 311 results will take precedence unless, after consultation, the permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(a)(5)]
- b) *Determine the volume fraction of coating solids.* Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b): [§63.3951(b)]
- i) *Determine the volume fraction of coating solids for each coating.* The permittee shall determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in §63.3941(b)(1) through (4). If test results obtained according to §63.3941(b)(1) do not agree with the information obtained under §63.3941(b)(3) or (4), the test results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(b)]
- (1) *ASTM Method D2697–86 (Reapproved 1998) or ASTM Method D6093–97 (Reapproved 2003).* The permittee may use ASTM Method D2697–86 (Reapproved 1998), “Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings” (incorporated by reference, see §63.14), or ASTM Method D6093–97 (Reapproved 2003), “Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer” (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.3941(b)(1)]

- (2) *Alternative method.* The permittee may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(b)(2)]
- (3) *Information from the supplier or manufacturer of the material.* The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.3941(b)(3)]
- (4) *Calculation of volume fraction of coating solids.* The permittee may determine the volume fraction of coating solids using Equation 1 of §63.3941: [§63.3941(b)(4)]

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}} \quad \text{Equation 1}$$

Where:

$V_s$  = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{volatiles}$  = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in Appendix A of 40 CFR Part 60, grams volatile matter per liter coating.

$D_{avg}$  = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 test results and other information sources, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(b)(4)]

- c) *Determine the density of each material.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If the permittee is including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965–02, “Standard Test Methods for Specific Gravity of Coating Powders” (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475–98 or ASTM Method D5965–02 test results and other such information sources, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of §63.3951. [§63.3951(c)]
- d) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of §63.3951. [§63.3951(d)]
- e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and

cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of §63.3951. [§63.3951(e)]

$$H_e = A + B + C - R_w \quad \text{Equation 1}$$

Where:

$H_e$  = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of §63.3951.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of §63.3951.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of §63.3951.

$R_w$  = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to Paragraph (e)(4) of §63.3951. (The permittee may assign a value of zero to  $R_w$  if the permittee does not wish to use this allowance.) [§63.3951(e)]

i) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of §63.3951: [§63.3951(e)(1)]

$$A = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad \text{Equation 1A}$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

$Vol_{c,i}$  = Total volume of coating, i, used during the month, liters.

$D_{c,i}$  = Density of coating, i, kg coating per liter coating.

$W_{c,i}$  = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of Part 63.

m = Number of different coatings used during the month.

ii) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of §63.3951: [§63.3951(e)(2)]

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad \text{Equation 1B}$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$Vol_{t,j}$  = Total volume of thinner and/or other additive, j, used during the month, liters.

$D_{t,j}$  = Density of thinner and/or other additive, j, kg per liter.

$W_{t,j}$  = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of Part 63.

n = Number of different thinners and/or other additives used during the month.

iii) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of §63.3951: [§63.3951(e)(3)]

$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad \text{Equation 1C}$$



Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

Vols,k = Total volume of cleaning material, k, used during the month, liters.

Ds,k = Density of cleaning material, k, kg per liter.

Ws,k = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

iv) If the permittee chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of §63.3951, then the permittee shall determine the mass according to the following paragraphs:

[§63.3951(e)(4)]

(1) The permittee may only include waste materials in the determination that are generated by coating operations in the affected source for which the permittee uses Equation 1 of §63.3951 and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR Part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. The permittee may not include organic HAP contained in wastewater. [§63.3951(e)(4)(i)]

(2) The permittee shall determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in the determination any waste materials sent to a TSDF during a month if the permittee has already included them in the amount collected and stored during that month or a previous month. [§63.3951(e)(4)(ii)]

(3) Determine the total mass of organic HAP contained in the waste materials specified in §63.3951(e)(4)(ii). [§63.3951(e)(4)(iii)]

(4) The permittee shall document the methodology the permittee uses to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them. [§63.3951(e)(4)(iv)]

f) *Calculate the total volume of coating solids used.* Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of §63.3951: [§63.3951(f)]

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad \text{Equation 2}$$

Where:

V<sub>st</sub> = Total volume of coating solids used during the month, liters.

Vol<sub>c,i</sub> = Total volume of coating, i, used during the month, liters.

V<sub>s,i</sub> = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

m = Number of coatings used during the month.

g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of §63.3951: [§63.3951(g)]

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad \text{Equation 3}$$

Where:

H<sub>yr</sub> = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

$H_e$  = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of §63.3951.

$V_{st}$  = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of §63.3951.

y = Identifier for months.

n = Number of full or partial months in the compliance period (n equals 12).

- h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of §63.3951 shall be less than or equal to the applicable emission limit for each subcategory in §63.3890. The permittee shall retain all records as required by §63.3930 and 63.3931. [§63.3951(h)]
- i) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), shall be less than or equal to the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month is the end of a compliance period consisting of that month and the preceding 11 months. The permittee shall perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. [§63.3952(a)]
- j) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and shall be reported as specified in 63.3920(a)(6). [§63.3952(b)]
- k) As part of each semi-annual compliance report required by §63.3920, the permittee shall identify the coating operation(s) for which the permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the permittee shall submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g). [§63.3952(c)]
- l) The permittee shall maintain records as specified in §§63.3930 and 63.3931. [§63.3952(d)]

**Recordkeeping:**

1. The permittee shall collect and retain records of the data and information specified in §63.3930. Failure to collect and retain these records is a deviation from the applicable standard. [§63.3930]
  - a) A copy of each notification and report that the permittee submitted to comply with Part 63, Subpart MMMM, and the documentation supporting each notification and report. [§63.3930(a)]
  - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee shall retain a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee shall retain the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
  - c) For each compliance period, the following records: [§63.3930(c)]
    - i) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used. [§63.3930(c)(1)]

- ii) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951. [§63.3930(c)(3)]
  - d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. [§63.3930(d)]
  - e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
  - f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
  - g) If the permittee uses the emission rate without add-on controls, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
  - h) If the permittee uses an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), the permittee shall retain records of the following information:
    - i) The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.3930(h)(1)]
    - ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.3951. [§63.3930(h)(2)]
    - iii) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This shall include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.3930(h)(3)]
  - i) The permittee shall retain records of the date, time, and duration of each deviation. [§63.3930(j)]
2. The records shall be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
  3. As specified in §63.10(b)(1), the permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
  4. The permittee shall retain each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may retain the records off-site for the remaining three years. [§63.3931(c)]

**Reporting:**

1. *Semi-annual compliance reports.* The permittee shall submit semi-annual compliance reports for each affected source according to the requirements of §63.3920(a)(1) through (4) and

- §63.3920(a)(6). The semi-annual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in §63.3920(a)(2). [§63.3920(a)]
- a) *Dates*. Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee shall prepare and submit each semi-annual compliance report according to the dates specified in §63.3920(a)(1)(iv). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(1)]
- i) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A), the permittee shall submit the first and subsequent compliance reports according to the dates the permitting authority has established. [§63.3920(a)(1)(iv)]
- b) *Inclusion with Title V report*. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 shall report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If an affected source submits a semi-annual compliance report pursuant to this section along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semi-annual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a semi-annual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]
- c) *General requirements*. The semi-annual compliance report shall contain the information specified in §63.3920(a)(3)(i) through (v), and the information specified in §63.3920(a)(4) and (6) that is applicable. [§63.3920(a)(3)]
- i) Company name and address. [§63.3920(a)(3)(i)]
- ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3920(a)(3)(ii)]
- iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30 or December 31. Note that the information reported for each of the six months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
- iv) Identification of the compliance option or options specified in §63.3891 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option the permittee used. [§63.3920(a)(3)(iv)]
- v) For the emission rate without add-on controls compliance option (§63.3891(b)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. [§63.3920(a)(3)(v)]
- d) *No deviations*. If there were no deviations from the emission limitations in §63.3890 that apply, the semi-annual compliance report shall include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- e) *Deviations: Emission rate without add-on controls option*. If the permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semi-annual compliance report shall contain the information in §63.3920(a)(6)(i) through (iii). [§63.3920(a)(6)]

- i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890. [§63.3920(a)(6)(i)]
- ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee shall submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). The permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports). [§63.3920(a)(6)(ii)]
- iii) A statement of the cause of each deviation. [§63.3920(a)(6)(iii)]

<b>PERMIT CONDITION 002</b>		
10 CSR 10-6.220 Restriction Of Emission of Visible Air Contaminants		
<b>Emission Unit</b>	<b>Description</b>	<b>Control Device</b>
EP-10	Electrostatic Paint Spraying	CD-3 Fabric Filter

**Emission Limitation:**

- 1. The permittee shall not cause or permit to be discharged into the atmosphere from this emission source any visible emissions with an opacity greater than 20 percent.
- 2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

**Monitoring:**

- 1. The permittee shall conduct opacity readings on this emission source using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission sources are operating and when the weather conditions allow. If no visible emissions are observed using these procedures, then no further observations are required. If visible emissions are observed, then the source representative shall conduct a Method 9 observation.
- 2. The following monitoring schedule shall be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
  - b) Observations shall be conducted once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
  - c) Observations shall be conducted once per month. If a violation is noted, monitoring reverts to weekly.
  - d) If, at the issuance of this permit, the permittee has progressed in the monitoring schedule listed above, the permittee may continue to advance accordingly.
- 3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
- 4. For visible emissions perceived or believed to exceed the applicable opacity standard, the permittee shall inspect the dry filters (CD-3) for leaks and wear.

**Recordkeeping:**

1. The permittee shall maintain records of all Method 22 observation results using Attachment B, or an equivalent form generated by the permittee, noting whether any air emissions (except for water vapor) were visible from the emission sources.
2. The permittee shall maintain records of all Method 9 observation results using Attachment C, or an equivalent form generated by the permittee, noting whether the visible emissions (except for water vapor) exceeded the opacity limit.
3. The permittee shall maintain records of any equipment malfunctions using Attachment A or an equivalent form generated by the permittee.
4. Records may be kept in either written or electronic form.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>		
10 CSR 10-6.220 Restriction Of Emission of Visible Air Contaminants		
<b>Emission Unit</b>	<b>Description</b>	<b>Control Device</b>
EP-03	Billet Oven 5	--
EP-10A	Paint Line Washer	--
EP-10B	Paint Line Dry Off Oven	--
EP-10C	Paint Line Bake Oven	--
EP-12	Bake-Off Oven	--

**Emission Limitation:**

1. The permittee shall shall cause or permit to be discharged into the atmosphere from this emission source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

**Monitoring/Recordkeeping/Reporting:**

None. See Statement of Basis.

<b>PERMIT CONDITION 004</b>		
10 CSR 10-6.065(6) Voluntary Limitation(s)		
<b>Emission Unit</b>	<b>Description</b>	<b>Control Device</b>
EP-10	Electrostatic Paint Spraying	CD-3 Fabric Filter

**Operational Limitation:**

1. The permittee shall control particulate emissions from this emission unit using a fabric filter with a control efficiency of at least 95%. The fabric filter shall be equipped with a gauge or meter, which indicates the pressure drop across the filter medium. The gauge or meter shall be located such that the Department of Natural Resources' employees may easily observe them. Replace filters shall be kept on hand at all times. The filters shall be made of fiber appropriate for operating conditions expected to occur (i.e. temperature limits, acidic, and alkali resistance, and abrasion resistance).
2. The permittee shall maintain and operate the control device according to the manufacturer's specifications and recommendations or comparable maintenance procedures that meet or exceed the manufacturer's specifications.
3. The fabric filter shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5" of water column.
  - a) Exception: Due to a lack of cake on the filter medium, the permittee is not restricted to a minimum pressure drop across the control device for the first 24 hours after replacement of a filter.

**Monitoring:**

1. The permittee shall monitor and record the operating pressure drop across the control device at least once each operating day while the unit is operating. The operating pressure drop range shall be specified based on normal operation and manufacturer's recommendations.
2. The permittee shall maintain an operating and maintenance log for each control device using Attachment A or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
  - c) Dates and times of all filter replacements.
3. The permittee shall retain a copy of the manufacturer's specifications
4. Attachment D contains calculations documenting that the permittee is in compliance with the particulate matter emission limits while the fabric filter is being properly maintained and operated.
5. Records may be kept in either written or electronic form.
6. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
7. All records shall be maintained for five years.

**Reporting:**

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

## IV. Core Permit Requirements

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

### **10 CSR 10-6.045 Open Burning Requirements**

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.



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

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

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

#### **10 CSR 10-6.065 Operating Permits**

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

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

#### **10 CSR 10-6.150 Circumvention**

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

### **10 CSR 10-6.165 Restriction of Emission of Odors**

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

### **10 CSR 10-6.170**

#### **Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

##### **Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

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

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

### **10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;

- b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
- a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

<b>40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)</b>
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- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).

- e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

## V. General Permit Requirements

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

### **10 CSR 10-6.065(6)(C)1.B Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### **10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
    - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and

no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

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

#### **10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

#### **10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

### **10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

The permittee may switch coatings at any time provided that the new coatings still meet the requirements of 40 CFR Part 63, Subpart Mmmm.

### **10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an



emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Michael Wargo, Site Operations Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the

source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;  
or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;  
or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

## **VI. Attachments**

Attachments follow.



**Attachment B**  
Method 22 Opacity Emission Observations

Date	Time	Emission Source	Visible Emissions		Excess Emissions		
			No	Yes <sup>1</sup>	Cause	Corrective Action	Initial

<sup>1</sup>If there are visible emissions, the permittee shall complete the excess emissions columns.

**Attachment C**

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

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

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

**Attachment D**  
 10 CSR 10-6.400 Demonstration

This attachment may be used to demonstrate that the listed emission units are exempt from 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*.

Allowable PM emission limitation for sources having a process weight rate (P) of 30 ton/hr or less:  $E = 4.1(P)^{0.67}$

Potential PM Emission Rate = P (ton/hr) x PM Emission Factor (lb/ton)

Emission Unit	Description	Process Weight	Emission Factor <sup>1</sup> (lbs/ton)	Maximum PM Emission Rate <b>Uncontrolled</b> (lbs/hr)	Maximum PM Emission Rate <b>Controlled</b> (lbs/hr)	PM Emission Limit (lbs/hr)	PTE < Limit?
FU-2	Billet Sawing	0.75 ton/hr	0.154	0.12	--	3.38	Yes
EP-10	Electrostatic Paint Spraying	4.4 gal/hr	3.72	16.37	0.33	11.06	Yes, if controlled

<sup>1</sup> Obtained from engineering calculation.

## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

M-D Building Products, previously owned by Loxscreen Company, Inc., makes and finishes aluminum extrusions to customer specifications. The aluminum extrusions produced by the installation include components for doors, windows, and recreational vehicles as well as other miscellaneous aluminum products. The facility contains extrusion, anodizing, painting, fabricating, remelting, and billet casting operations. The installation is a major source of Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), and Xylene (1330-20-7). This facility is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>2</sup>
PM <sub>10</sub>	3.58
PM <sub>2.5</sub>	3.58
Sulfur Oxides (SO <sub>x</sub> )	0.06
Nitrogen Oxides (NO <sub>x</sub> )	11.30
Volatile Organic Compounds (VOCs)	197.07
Carbon Monoxide (CO)	6.66
Hazardous Air Pollutants (HAPs)	28.88
Antimony Compounds	1.06
Xylene (1330-20-7)	17.71
Toluene (108-10-1)	8.60
Ethylbenzene (100-41-4)	7.28
Naphthalene (91-20-3)	2.49
4-Methylpentan-2-one (108-10-1)	1.72

<sup>2</sup> Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. EP-10 is calculated with a control device because its use is federally enforceable. VOCs, total HAPs, and individual HAPs were calculated based on their individual maximum potential-to-emit if considering all of the paints used at the facility.

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

Pollutants	2015	2014	2013	2012	2011
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.16	0.37	0.38	0.32	0.33
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.16	0.37	0.38	0.32	0.21
Sulfur Oxides (SO <sub>x</sub> )	0.01	0.02	0.21	0.02	0.02
Nitrogen Oxides (NO <sub>x</sub> )	1.78	3.45	3.47	2.78	2.77
Volatile Organic Compounds (VOC)	3.07	11.13	12.13	9.54	10.60
Carbon Monoxide (CO)	1.49	2.90	2.92	2.33	2.33
Hazardous Air Pollutants (HAPs) <sup>3</sup>	--	--	--	--	--

**Permit Reference Documents**

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

1. Part 70 Operating Permit Application, received May 27, 2016;
2. 2015 Emissions Inventory Questionnaire, received February 23, 2016; and
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
4. Construction Permit 0981-002, Issued September 1, 1981
5. Construction Permit 0188-005, Issued January 15, 1988
6. Construction Permit 1093-011, Issued October 17, 1993
7. Construction Permit 0496-013, Issued April 17, 1996
8. Construction Permit 0497-025, Issued April 15, 1997
9. Construction Permit 0997-001, Issued August 13, 1997
10. Construction Permit 1198-017, Issued June 30, 1998
11. No Construction Permit Required Determination, Issued July 14, 2000
12. No Construction Permit Required Determination, Issued August 3, 2001
13. Construction Permit 092007-001, Issued September 4, 2007
14. No Construction Permit Required Determination, Issued July 10, 2007
15. No Construction Permit Required Determination, Issued October 2, 2008
16. No Construction Permit Required Determination, Issued October 3, 2008
17. No Construction Permit Required Determination, Issued June 20, 2011

<sup>3</sup> HAPs are reported under VOC or PM<sub>10</sub> in the EIQ.



**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.

None.

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

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

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

These rules are not applicable to the installation and have not been applied within this permit. The following sulfur compound emission sources are exempt under 6.260(1)(A)2 and 6.261(1)(A) as they exclusively combust pipeline grade natural gas:

<b>Emission Unit</b>	<b>Description</b>
EP-03	Billet Oven 5
EP-05	Heat Treat Oven 5
EP-06	Heat Treat Oven 7
EP-10A	Paint Line Washer
EP-10B	Paint Line Dry Off Oven
EP-10C	Paint Line Bake Oven
EP-12	Paint Hook Bake-Off Oven

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

By 6.400(1)(B)14, as long as a coating operation is equipped with a control system that controls at least 95% of particulate overspray and is operated and maintained in accordance with the manufacturer's specifications, this facility is exempt from this rule. EP-10's coating operation a requirement to use a minimum control efficiency of 95%, thus is exempt from this rule. FU-2 is exempt by having a potential to emit less than the limit established in the rule as shown in Attachment D. This attachment also shows EP-10 is required to use a control device to stay in compliance.

The following particulate emission sources are exempt as they combust liquid/gaseous fuel not fitting the definition of process weight in 10 CSR 10-6.400(2)(A):

<b>Emission Unit</b>	<b>Description</b>
EP-03	Billet Oven 5
EP-05	Heat Treat Oven 5
EP-06	Heat Treat Oven 7
EP-10A	Paint Line Washer
EP-10B	Paint Line Dry Off Oven
EP-10C	Paint Line Bake Oven
EP-12	Paint Hook Bake-Off Oven

### **Construction Permit History**

Construction Permit 0981-002, Issued September 1, 1981:

This de minimis construction permit is for the installation of EP-01 Reverberatory Remelt Furnace and EP-02 Homogenizer (Aluminum Log Tempering).

This de minimis construction permit does not contain any special conditions.

Construction Permit 0188-005, Issued January 15, 1988:

This de minimis construction permit is for the installation of a “bright-dip process”, a 3.0 MMBtu/hr bill heater, and a 1.5 MMBtu/hr curing oven.

This de minimis construction permit does not contain any special conditions.

Construction Permit 1093-011, Issued October 17, 1993:

This de minimis construction permit is for the installation of an aluminum buffing operation.

This de minimis construction permit does not contain any special conditions.

Construction Permit 0496-013, Issued April 17, 1996:

This general construction permit is for the installation of EP-10 Electrostatic Paint Spraying, EP-10A Paint Line Washer, EP-10B Paint Line Dry Off Oven, EP-10C Paint Line Bake Oven, and EP-13 Cleanup Solvents.

This general construction permit does not contain any special conditions.

Construction Permit 0497-025, Issued April 15, 1997:

This de minimis construction permit is for the installation of EP-11 Solvent Recovery. The solvent recovery operations consist of a still to recover MEK. Please note that EPA removed MEK from the list of HAPs on December 19, 2005.

This de minimis construction permit does not contain any special conditions.

Construction Permit 0997-001, Issued August 13, 1997:

This de minimis construction permit is for the installation of two natural gas-fired thermal filter cake dryers.

The thermal filter cake dryers were installed, but have since been removed from the installation. As the thermal filter cake dryers are no longer located at the installation, this construction permit and its associated special conditions are no longer applicable to the installation.

Construction Permit 1198-017, Issued June 30, 1998:

This de minimis construction permit is for the installation of EP-12 Paint Hook Bake-Off Oven.  
This de minimis construction permit does not contain any special conditions.

No Construction Permit Required Determination, Issued July 14, 2000:

This no construction permit required determination is for the like-kind replacement of EP-12 Paint Hook Bake-Off Oven. The original oven constructed in 1998 under Construction Permit 1198-017 was permitted at 5.0 MMBtu/hr, the like-kind replacement is 0.6 MMBtu/hr.

No Construction Permit Required Determination, Issued August 3, 2001:

This no construction permit required determination is for the installation of a dross press.

Construction Permit 092007-001, Issued September 4, 2007:

This de minimis construction permit is for the reconfiguration of the remelt furnace's stack(s) and a reconfiguration of the remelt furnace's door. This permit allowed the installation to combine the two stacks exiting the furnace into one stack. The door reconfiguration allowed the door to open to a greater extent, allowing additional fuel input.

This de minimis construction permit does not contain any special conditions.

No Construction Permit Required Determination, Issued July 10, 2007:

This no construction permit required determination is for the like-kind replacement of a billet saw reported under FU-2 Billet Sawing.

No Construction Permit Required Determination, Issued October 2, 2008:

This no construction permit required determination is to allow the usage of an old billet saw when the new billet saw is unavailable.

No Construction Permit Required Determination, Issued June 20, 2011:

This no construction permit required determination is for the reactivation of EP-01 Remelt Furnace. The installation deactivated the unit in December of 2009, but later decided they would like to retain the ability to use this unit. Presently, as of issuance of this permit, EP-01 is fully disconnected from this facility and thus is not included in this operating permit.

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

40 CFR Part 60, Subpart E – *Standards of Performance for Incinerators*

This rule is not applicable to the installation and has not been applied within this permit. Subpart E is applicable to incinerators with charging rates greater than 50 ton/day. [§60.50(a)] EP-12 Paint Hook Bake-Off Oven, constructed in 1998, is an industrial solid waste incinerator with a charging rate of 0.015 ton/day (based upon 4.4 gallons per hour of coating usage, 10.379 pounds solids per gallon of coating, 65 percent transfer efficiency, and only coating hooks rather than product).

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

This rule is not applicable to the installation and has not been applied within this permit. Subpart EE is applicable to metal furniture surface coating operations in which organic coatings are applied. [§60.310(a)] The installation does not currently produce or surface coat any furniture as part of their operations.

40 CFR Part 60, Subpart MM – *Standards of Automobile and Light Duty Truck Surface Coating Operations*

This rule is not applicable to the installation and has not been applied within this permit. Subpart MM is applicable to automobile or light duty truck assembly plants. [§60.390(a)] The installation does produce components for recreational vehicles; however, these recreation vehicles do not meet the definition of automobile or light duty truck in §60.391(a).

40 CFR Part 60, Subpart DDDD – *Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units*

This regulation is not applicable to the installation and has not been applied in this permit. [§60.2875] *Burn-off oven* means any rack reclamation unit, part reclamation unit, or drum reclamation unit. A burn-off oven is not an incinerator, waste-burning kiln, an energy recovery unit or a small, remote incinerator under this subpart. EP-12 Paint Hook Bake-Off Oven meets the definition of a rack reclamation unit, which is not an incinerator under this subpart.

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

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning*

This rule is not applicable to the installation and has not been applied within this permit. Subpart T is applicable to individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machines that use any solvent containing methylene chloride (CAS No. 75–09–2), perchloroethylene (CAS No. 127–18–4), trichloroethylene (CAS No. 79–01–6), 1,1,1-trichloroethane (CAS No. 71–55–6), carbon tetrachloride (CAS No. 56–23–5) or chloroform (CAS No. 67–66–3), or any combination of these halogenated HAP solvents, in a total concentration greater than five percent by weight, as a cleaning and/or drying agent. [§63.460(a)] EP-13 Cleanup Solvents does not contain any of the listed cold solvent cleaning machines or chemicals.

40 CFR Part 63, Subpart IIII – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks*

This rule is not applicable to the installation and has not been applied within this permit. This regulation is applicable to installations surface coating new automobile or new light-duty truck bodies and body part for new automobiles or new light-duty trucks. [§63.3080] The installation does produce components for recreational vehicles; however, these recreation vehicles do not meet the definition of automobile or light duty truck in §63.3176.

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

This rule is applicable to EP-10 Electrostatic Paint Spraying and has been applied within this permit.

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

This regulation does not apply because the facility is not a major source of HAPs.

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

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption

Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

### **Compliance Assurance Monitoring (CAM) Applicability**

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable to the installation. EP-10 Electrostatic Paint Spraying does require a control device to meet the particulate emission limits of 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes; however, the emission unit has pre-control particulate emissions of 71.68 ton/year – below the particulate major source threshold of 100 ton/year.

### **Greenhouse Gas Emissions**

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

### **Other Regulatory Determinations**

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

The monitoring and recordkeeping conditions have been removed from the Core Permit Requirements due to the facility emitting very little particulate matter, as they were deemed unnecessary.

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

This rule is applicable to the installation and has been applied within this permit. The regulation is applicable to the following visible emission sources; however, as potential particulate emissions for these sources is less than 0.5 lb/hr they are assumed to be in compliance and have no monitoring/recordkeeping/reporting at this time:

Emission Unit	Description	Process SCC	MHDR (MMscf/hr)	PM <sub>10</sub> Emission Factor (lb/MMscf)	PTE (lb/hr)
EP-03	Billet Oven 5	10200603	0.003	7.6	0.1
EP-10A	Paint Line Washer	10200603	0.006	7.6	0.2
EP-10B	Paint Line Dry Off Oven	10200603	0.0029	7.6	0.1
EP-10C	Paint Line Bake Oven	10200603	0.0048	7.6	0.2
EP-12	Bake-Off Oven	10200603	0.0006	7.6	0.01

**Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

## Response to Public Comments

The draft Part 70 operating permit renewal for M-D Building Products was placed on public notice November 10, 2016 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notice.htm>. Comments were received from Robert Cheever of the EPA on November 21, 2016. The comments will be addressed within this Response to Public Comments document.

### **Public Comment #1:**

Permit Condition 001 incorporates applicable requirements from 40 CFR part 63, Subpart M-*National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*. The term "of this section;" "in this subpart;" "in this section;" "to this section;" "to this subpart;" "pursuant to this section;" "with this subpart" are used throughout. These terms are very appropriate when used in the context of the Code of Federal Regulations, however, operating permits do not normally have "sections" and "subparts." Therefore EPA recommends MDNR modify the wording in Permit Condition 001 to eliminate these references.

### **Missouri Air Pollution Control Program Response to Comment #1:**

This change has been made.

### **Public Comment #2:**

The emission limitations in both Permit Condition 002 and Permit Condition 003 indicate the individual responsible for compliance is "owner or other person" and "a person." It is MDNR's customary convention to refer to the "permittee" and the individual with compliance responsibility. EPA recommends MDNR replace "owner or other person" and "a person" with "permittee."

### **Missouri Air Pollution Control Program Response to Comment #2:**

This change has been made.

### **Public Comment #3:**

Attachment B and Attachment C, in this draft operating permit, are shown as blank pages with an explanation as to why they were removed from the operating permit. Part 70 operating permits are required to include all applicable requirements, and if Attachment B and Attachment C are no longer applicable, then they do not belong in the operating permit and EPA recommends MDNR remove these blank pages.

### **Missouri Air Pollution Control Program Response to Comment #3:**

This change has been made. The remaining attachments have additionally been renamed.

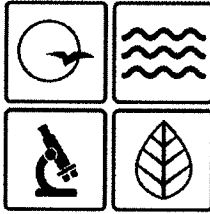
**Public Comment #4:**

During EPA's review of this draft Part 70 operating permit, it was determined that this facility was previously known as Loxscreen Company, Inc. However, the draft Part 70 operating permit makes no mention of a previous owner. EPA recommends MDNR provide a brief ownership history as part of the Installation Description in the Statement of Basis.

**Missouri Air Pollution Control Program Response to Comment #4:**

This change has been made.





Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 13 2017

Mr. Michael Wargo  
M-D Building Products, Inc.  
665 Gettings Lane  
Hayti, MO 63851

Re: M-D Building Products, Inc., 155-0045  
Permit Number: OP2017-023

Dear Mr. Wargo:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS:kwj

Enclosures

c: PAMS File: 2016-05-075

