

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **102011-002**

Project Number: 2011-06-014
Installation Number: 195-0054

Parent Company: Otherside Motors

Parent Company Address: 1155 Santa Fe, Marshall, MO 65340

Installation Name: Otherside Motors

Installation Address: 1155 Santa Fe, Marshall, MO 65340

Location Information: Saline County, S10, T50N, R21W

Application for Authority to Construct was made for:
Construction of an abrasive blasting operation. The blasting equipment was installed without obtaining a construction permit. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

OCT 05 2011

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

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

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

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

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

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

Page No.	3
Permit No.	
Project No.	2011-06-014

SPECIAL CONDITIONS:

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

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

Otherside Motors
Saline County, S10, T50N, R21W

1. Emission Limitation
 - A. Otherside Motors shall emit less than 15.0 tons of particulate matter less than ten microns in diameter (PM₁₀) in any consecutive 12-month period from the abrasive blasting operation (EU-1).
 - B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1.A.
2. Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170
 - A. Otherside Motors 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.
 - B. Otherside Motors 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
 - C. 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:

Page No.	4
Permit No.	
Project No.	2011-06-014

SPECIAL CONDITIONS:

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

- 1) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - 2) Paving or frequent cleaning of roads, driveways and parking lots;
 - 3) Application of dust-free surfaces;
 - 4) Application of water; and
 - 5) Planting and maintenance of vegetative ground cover.
- D. Otherside Motors shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If Otherside Motors discovers a violation, the Otherside Motors shall undertake corrective action to eliminate the violation.
- E. Otherside Motors shall maintain the following monitoring schedule:
- 1) Otherside Motors shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
 - 2) Should no violation of this regulation be observed during this period then-
 - a) Otherside Motors may observe once every two weeks for a period of eight weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - (i) Otherside Motors may observe once per month.
 - (ii) If a violation is noted, monitoring reverts to weekly.
 - 3) If Otherside Motors reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.
- F. Otherside Motors shall document the inspections required in Special Condition 2.D in a log noting the following:
- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
 - 2) Whether the visible emissions were normal for the installation.
 - 3) Whether equipment malfunctions contributed to an exceedance.
 - 4) Any violations and any corrective actions undertaken to correct the violation.
3. Record Keeping and Reporting Requirements
- A. Otherside Motors shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Page No.	5
Permit No.	
Project No.	2011-06-014

SPECIAL CONDITIONS:

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

- B. Otherside Motors shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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

Project Number: 2011-06-014
Installation ID Number: 195-0054
Permit Number:

Otherside Motors
1155 Santa Fe
Marshall, MO 65340

Complete: June 6, 2011

Parent Company:
Otherside Motors
1155 Santa Fe
Marshall, MO 65340

Saline County, S10, T50N, R21W

REVIEW SUMMARY

- Otherside Motors has applied for authority to construct an abrasive blasting operation. The blasting equipment was installed without obtaining a construction permit.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- 10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*, (3)(HHHHH) National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources applies to the installation.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of PM₁₀ are conditioned below de minimis levels.
- This installation is located in Saline County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Otherside Motors is an existing auto body refinishing shop. The repair and refinishing activities are exempt from construction permitting per 10 CSR 10-6.061 *Construction Permit Exemptions* (3)(A)2.Z.

No permits have been issued to Otherside Motors from the Air Pollution Control Program.

PROJECT DESCRIPTION

Otherside Motors has applied for authority to construct a Clemco 6.0 Cuft abrasive blasting unit. The unit holds 6 cubic feet of abrasive and is fed by a 185 cubic feet per minute compressor. The unit is capable of processing 468 pounds of abrasive per hour. It is located outside between the auto body shop and another business owned by the property owner. The units is not exempt under 10 CSR (3)(A)2.Z because the unit is used to clean metal panels before painting in part of their manufacturing process.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, section 13.2.6 “Abrasive Blasting,” October 1997. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Application	Application Conditioned Potential
PM _{2.5}	10.0	N/D	N/D	2.66	1.50
PM ₁₀	15.0	N/D	N/D	26.65	< 15.0
SO _x	40.0	N/D	N/D	N/A	N/A
NO _x	40.0	N/D	N/D	N/A	N/A
VOC	40.0	N/D	N/D	N/A	N/A
CO	100.0	N/D	N/D	N/A	N/A
HAPs	10.0/25.0	N/D	N/D	N/A	N/A

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

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

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

GENERAL REQUIREMENTS

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

SPECIFIC REQUIREMENTS

- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, 40 CFR Part 63, Subpart HHHHHH

STAFF RECOMMENDATION

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

Michael Mittermeyer
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 1, 2011, received June 6, 2011, designating Otherside Motors as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Site Survey, dated June 16, 2011.

Mr. Nick Schaefer
Owner
Otherside Motors
1155 Santa Fe
Marshall, MO 65340

RE: New Source Review Permit - Project Number: 2011-06-014

Dear Mr. Schaefer:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:mml

Enclosures

c: Northeast Regional Office
PAMS File: 2011-06-014

Permit Number: