

PERMIT BOOK

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: **07 2 0 1 2 - 0 0 8** Project Number: 2011-06-042

Installation Number: 167-0038

Parent Company: Ott Distributing, LLC

Parent Company Address: 307 South Pike, Bolivar, MO 65613

Installation Name: Ott Distributing, LLC

Installation Address: 307 South Pike, Bolivar, MO 65613

Location Information: Polk County, S11, T33N, R25W

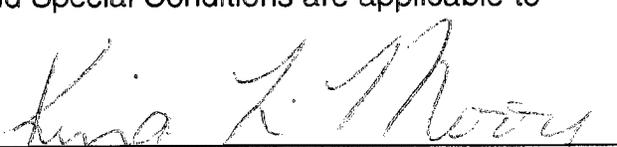
Application for Authority to Construct was made for:
Miscellaneous metal fabrication and dip tank surface coating installation. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

JUL 20 2012

EFFECTIVE DATE



DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

You must notify the Department's 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.	2011-06-042

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."

Ott Distributing, LLC
Polk County, S11, T33N, R25W

1. Emission Limitation
 - A. Ott Distributing, LLC shall emit less than 10.0 tons of mixed isomer xylene (Chemical Abstract Service (CAS) 1330-20-7) in any consecutive 12-month period from dip tank 1 (EP-01) and dip tank 2 (EP-02).
 - B. Attachment A or an equivalent form, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.
2. Operational Requirement

Ott Distributing, LLC shall keep the surface coatings, paints, solvents and cleaning solutions in sealed containers whenever the materials are not in use. Ott Distributing, LLC shall provide and maintain suitable, easily read, and permanent markings on all of the above containers.
3. Record Keeping and Reporting Requirements
 - A. Ott Distributing, LLC shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
 - B. Ott Distributing, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

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

Project Number: 2011-06-042
Installation ID Number: 167-0038
Permit Number:

Ott Distributing, LLC
307 South Pike
Bolivar, MO 65613

Complete: June 15, 2011

Parent Company:
Ott Distributing, LLC
307 South Pike
Bolivar, MO 65613

Polk County, S11, T33N, R25W

REVIEW SUMMARY

- Ott Distributing, LLC has applied for authority to construct a miscellaneous metal fabrication and dip tank surface coating installation.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are ethyl benzene (CAS 100-41-4), manganese compounds, and mixed isomer xylenes (CAS 1330-20-7).
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- 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 mixed isomer xylenes are conditioned below the major source threshold. Potential emissions of combined HAPs are proportionately reduced below the major source threshold. Potential emissions of volatile organic compounds (VOC) are proportionately reduced below the de minimis level.
- This installation is located in Polk 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 are not required for the equipment.
- No operating permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Ott Distributing, LLC is a new miscellaneous metal fabrication and dip tank surface coating facility located in Bolivar. The facility proposes to manufacture steel livestock feeders, bunks, gates, pens, and mobile home stairs. Steel pipe and sheet will be cut, bent, folded, and welded into finished shapes then dip tank surface coated in batches. No permits have been issued to Ott Distributing, LLC from the Air Pollution Control Program.

PROJECT DESCRIPTION

The facility will be comprised of various sheet metal benders, saws, welders, grinders, other metal working equipment, two dip tanks, and two 5,000 British thermal unit per hour heat input, propane fired space heaters. One dip tank will hold approximately 1,200 gallons of paint and thinner. The other tank will hold approximately 1,100 gallons of paint and thinner. Tank 1 (EP-01) will hold Anchor Paint Manufacturing Fast Dry Orange B7057 mixed 3:1 with acetone thinner. Tank 2 (EP-02) will hold Anchor Paint Manufacturing Quick Touch J.D. Green EN 1212 mixed 3:1 with acetone thinner. Parts will be dipped using an overhead crane and left in place over the tanks to dry. Tanks will be covered when not in use. These tanks were obtained from H&H Farm Products and were permitted under permit 012000-014. Ott Distributing, LLC intends to operate the tanks at the same design rate as they were previously permitted, 1.54 gallons of as-applied surface coating consumed per hour, per tank. No control devices are associated with the dip tanks.

EMISSIONS/CONTROLS EVALUATION

Potential emissions from the dip tanks were calculated using the VOC and HAP contents on the respective MSDS and mass balance. All consumed VOC were considered emitted. All consumed volatile HAP were considered emitted. Particulate matter emissions can be calculated using the MSDS and a dip coating transfer efficiency of 100 percent. Ninety percent transfer efficiency is provided in Environmental Protection Agency (EPA) document AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition, Tables 4.2.2.4-2 April, 1981, and 4.2.2.12-1 May, 1983. Although the facility is not subject to the regulation, 90 percent transfer efficiency can also be found in 40 CFR Part 60, Subpart EE, *Standards of Performance for Surface Coating of Metal Furniture*. This transfer efficiency does not represent dip surface coating at this installation, as the coating will be accomplished in relatively non-mobile batches, not a moving conveyor line. Therefore 100 percent transfer efficiency was selected for this review. Particulate matter and HAPs that are particulate matter are not expected to be released into the air from surface coating.

Each paint contains ethyl benzene, mixed isomer xylenes, and manganese neodecanoate which is a manganese compound. Unconditioned potential emissions of mixed isomer xylenes exceed the major source threshold for individual HAPs of 10.0 tons per year.

40 CFR Part 63, Subpart MMMM, *National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, Subpart RRRR, *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Furniture*, Subpart HHHHHH *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, and Subpart XXXXXX *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* do not apply to this facility. Subparts MMMM and RRRR do not apply as the facility is not a major HAP source. Subpart HHHHHH does not apply as the facility does not spray-apply coating. Subpart XXXXXX does not apply because although the facility is primarily engaged in fabricated metal products and uses a surface coating containing a manganese compound, the weight concentration of manganese is less than the threshold needed to be defined as a metal fabrication or metal finishing HAP.

Potential emissions of particulate matter from steel fabrication including cutting, sanding, and welding from similar permitted facilities are less than 0.2 tons per year, and were included in this review. Propane combustion from the space heaters results in potential emissions less than 0.01 ton per year for nitrogen oxides (NO_x) counted towards the installation wide potential to emit. Potential emissions of other pollutants are even less. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year). Since the installation is new, there are no existing potential or actual emissions. Since the dip tanks are the only significant source of emissions, limiting their emissions limits the installation's emissions. The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Unconditioned Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	0.2	0.08
PM ₁₀	15.0	0.2	0.08
PM _{2.5}	10.0	0.2	0.08
SO _x	40.0	N/D	N/A
NO _x	40.0	N/D	N/A
VOC	40.0	46.39	17.67
CO	100.0	N/D	N/A
Combined HAPs	25.0	32.31	12.31
Ethyl Benzene	10.0	6.05	2.31
Mixed Isomer Xylenes	10.0	26.25	< 10.0

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 mixed isomer xylenes are conditioned below the major source threshold. Potential emissions of combined HAPs are proportionately reduced below the major source threshold. Potential emissions of VOC are proportionately reduced below the de minimis level.

APPLICABLE REQUIREMENTS

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

GENERAL REQUIREMENTS

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

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.

David Little
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 14, 2011, received June 15, 2011, designating Ott Distributing, LLC as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Mr. Mike Ott
Member
Ott Distributing, LLC
307 South Pike
Bolivar, MO 65613

RE: New Source Review Permit - Project Number: 2011-06-042

Dear Mr. Ott:

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:dll

Enclosures

c: Southwest Regional Office
PAMS File: 2011-06-042

Permit Number: