

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: **022014-004** Project Number: 2013-06-052

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:

Two dip surface coating tanks (EP-03 and EP-04), modification of reducer type for existing dip surface coating tanks (EP-01 and EP-02). 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.

FEB - 7 2014

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.

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SPECIAL CONDITIONS:

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

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

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

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit 072012-008 issued by the Air Pollution Control Program.
2. **HAP Emission Limitations**
 - A. Ott Distributing, LLC shall emit less than 10.0 tons individually and 25.0 tons combined of HAPs in any consecutive 12-month period from the entire installation (dip coating tanks EP-01 through EP-04).
 - B. Attachment A and Attachment B or equivalent forms, such as electronic forms, preapproved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 2.A and 2.B.
3. **Operational Requirement – Coating/Reducer/Solvent**
Ott Distributing, LLC shall keep the coatings, reducers, and solvents in sealed containers whenever the materials are not in use. Ott Distributing, LLC shall provide and maintain suitable, easily read, permanent markings on all coatings, reducers, and solvents containers used with this equipment.
4. **Use of Alternative Coating in the Dip Tanks (EP-01 through EP-04)**
 - A. Before using an alternative coating in the tanks that differs from a material listed in the Application for Authority to Construct, Ott Distributing LLC shall calculate the potential emissions of all individual HAPs and total VOC in the alternative material.
 - B. Ott Distributing LLC shall seek approval from the Air Pollution Control Program New Source Review Unit before use of the alternative material if the potential individual HAP emissions for the alternative material exceed the SMAL for any chemical listed in Appendix B, or if the total VOC emissions exceed 22.92 tons per year.

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SPECIAL CONDITIONS:

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

- C. Attachment C or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to show compliance with Special Conditions 4.A. and 4.B.
5. 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 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 10 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: 2013-06-052
Installation ID Number: 167-0038
Permit Number:

Ott Distributing, LLC
307 South Pike
Bolivar, MO 65613

Complete: June 19, 2013

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 install two dip surface coating tanks (EP-03 and EP-04) and modify the reducer for existing tanks (EP-01 and EP-02).
- HAP emissions including ethyl benzene, diethylene glycol ethers, toluene, and xylene are expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) under 40 CFR 60 apply to the installation.
- None of the NESHAPs under 40 CFR 61 apply to this installation.
- None of the MACTs under 40 CFR 63 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 HAPs are conditioned to area source levels. Potential emissions of VOC are indirectly conditioned to 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 HAP emissions of the project are below respective screening model action levels and potential VOC emissions are below the de minimis level.
- Emissions testing is 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 miscellaneous metal fabrication and dip tank surface coating facility located in Bolivar. The facility manufactures steel livestock feeders, bunks, gates, pens, and mobile home stairs. Steel pipe and sheet are cut, bent, folded, and welded into finished shapes then dip tank surface coated in batches. The installation is a de minimis VOC source and area HAP source. The installation does not have an operating permit. The following permits have been issued to Ott Distributing, LLC from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
072012-008	2 dip surface coating tanks (EP-01 and EP-02)

PROJECT DESCRIPTION

The installation proposes to install two dip surface coating tanks (EP-03 and EP-04) similar to the previously permitted tanks (EP-01 and EP-02), and change reducer type in tanks EP-01 and EP-02. One new dip tank will measure 4x4x8 feet and hold black paint and reducer. The other tank will measure 3.5x3x7 feet and hold stain and reducer. The black paint is Anchor Paint Mfg - Quick Touch Black 1201. The stain is Anchor Paint Mfg - Stain H&H Walnut B7728. The reducer is toluene. The existing reducer under permit 072012-008 was acetone. The mixing ratio is 3:1. The existing permitted paints remain for tanks EP-01 and EP-02. 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. All four 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 were 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 this surface coating.

Each new coating contains ethyl benzene, mixed isomer xylenes, diethylene glycol monomethyl ether, manganese compounds, and cobalt compounds. Unconditioned potential emissions of ethyl benzene, mixed isomer xylenes, and toluene exceed the major source threshold for individual HAPs of 10.0 tons per year, but are limited to area source levels.

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 the installation's SIC 3523 is not one of the nine metal fabrication and finishing source categories.

The lowest potential VOC emissions from a single coating tank are 22.92 tpy. This value was used in the alternative coating special condition. The special condition allows flexibility when considering new surface coatings, with guidelines on when to contact the Air Pollution Control Program before their use.

The following table provides an emissions summary for this project. Existing potential emissions were obtained from permit 072012-008. Potential emissions of the project represent the potential of the new tanks and modified existing tanks assuming continuous operation (8,760 hours per year). The new installation conditioned potential represents conditioned HAP emissions and indirectly conditioned VOC emissions. Since the dip tanks are the only significant source of HAP and VOC emissions, limiting their HAP emissions proportionately limits the installation's VOC emissions. Two 5,000 Btu/hr propane heaters were mentioned in the previous permit, but their emissions were not calculated. The emissions have been included in this permit's new installation potential emissions.

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2012 EIQ)	Unconditioned Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	0.08	N/A	N/A	0.20
PM ₁₀	15.0	0.08	N/A	N/A	0.20
PM _{2.5}	10.0	0.08	N/A	N/A	0.20
SO _x	40.0	N/D	N/A	N/A	7.18E-04
NO _x	40.0	N/D	N/A	N/A	6.22E-03
VOC	40.0	17.67	0.34	141.77	27.38
CO	100.0	N/D	N/A	N/A	3.59E-03
GHG (CO ₂ e)	75,000 / 100,000	N/D	N/A	N/A	6.12
GHG (mass)	0.0 / 100.0 / 250.0	N/D	N/A	N/A	5.98
HAPs	10.0 / 25.0	12.31	N/D	112.36	< 10.0 / 25.0
Ethyl Benzene	10.0	2.31	N/D	12.20	< 10.0
Mixed Isomer Xylenes	10.0	< 10.0	N/D	51.77	< 10.0
Toluene	10.0	N/A	N/A	48.38	< 10.0
Diethylene glycol monomethyl ether	¹ 5.0	N/A	N/D	8.14E-03	< 10.0

N/A = Not Applicable; N/D = Not Determined ¹ SMAL

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 HAPs are conditioned to area source levels. Potential emissions of VOC are indirectly conditioned to 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
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 18, 2013, received June 19, 2013, 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.

Appendix C: Alternative Coating Worksheet

Ott Distributing, LLC
 Polk County, S11, T33N, R25W
 Project Number: 2013-06-052
 Installation ID Number: 167-0038
 Permit Number: _____

Coating Name: _____ Date: _____ Copy this sheet as needed.

A	B	C	D	E	F	G	H	I
Individual HAP Name and CAS No.	HAP is also PM (yes / no)	Individual HAP Content (max weight %)	Maximum Application Rate (lbs coating per hour)	Overall PM Control Efficiency (%)	Individual HAP PTE (tons per year)	Individual HAP SMAL (tons per year)	Coating VOC (weight %)	Coating VOC PTE (tons per year)
<i>Benzene 71-43-2</i>	<i>no</i>	<i>2.0%</i>	9.56	N/A	0.84	2.0	36.61%	15.33
<i>Cobalt 2-Ethylhexanoate 136-52-7</i>	yes	0.5%		100%	0.00	0.1		

- A. Record the all individual HAPs from this single coating MSDS.
- B. Compare the HAP to Appendix B for verification as particulate matter.
- C. Record the maximum weight percent of each HAP from the MSDS.
- D. The maximum application rate is 1.155 gal/hr coating per hour per tank, after reducing at 3:1. Multiply 1.155 by the coating's density (lb/gal) to obtain lbs/hr. If the 1.155 gal/hr maximum application rate is exceeded, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.
- E. The overall PM control efficiency is 100% for this installation's dip surface coating.
- F. Calculate the particulate matter HAP potential to emit: $F = C \times D \times (1 - E) \times 8,760 / 2,000$. Otherwise calculate the volatile HAP potential to emit: $F = C \times D \times 8,760 / 2,000$.
- G. Record the individual HAP SMAL from the most recent Appendix B, also available at <http://www.dnr.mo.gov/env/apcp/permits/constpmtguide.htm> as *Table of Hazardous Air Pollutants, Screening Model Action Levels and Risk Assessment Levels*. If the individual HAP potential to emit is greater than the SMAL seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.
- H. Record or calculate the coating's VOC weight % from the MSDS. Verify VOC status according to 10 CSR 10-6.020 *Definitions and Common Reference Tables (2)(V)13*.
- I. Calculate the VOC potential to emit: $I = D \times H \times 8,760 / 2,000$. If the VOC potential to emit is greater than 22.92 tons per year seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.

APPENDIX A

Abbreviations and Acronyms

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

Appendix B: Table of Hazardous Air Pollutants and Screening Model Action Levels (May 3, 2012 Revision 10)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CARBARYL	63-25-2	10	V	Y	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
ACETOPHENONE	98-86-2	1		Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CATECHOL	120-80-9	5		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
ACROLEIN	107-02-8	0.04		Y	N	CHLORAMBEN	133-90-4	1		Y	Y	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
ACRYLAMIDE	79-06-1	0.02		Y	N	CHLORDANE	57-74-9	0.01		Y	Y	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
ACRYLIC ACID	79-10-7	0.6		Y	N	CHLORINE	7782-50-5	0.1		N	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
ACRYLONITRILE	107-13-1	0.3		Y	N	CHLOROACETIC ACID	79-11-8	0.1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
AMINOBIIPHENYL, [4-]	92-67-1	1	V	Y	N	CHLOROBENZENE	108-90-7	10		Y	N	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
ANILINE	62-53-3	1		Y	N	CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	DIMETHYL PHTHALATE	131-11-3	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLOROFORM	67-66-3	0.9		Y	N	DIMETHYL SULFATE	77-78-1	0.1		Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
ANTIMONY COMPOUNDS		5	H	N	Y	CHLOROPRENE	126-99-8	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHROMIUM COMPOUNDS		5	L	N	Y	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	CHRYSENE	218-01-9	0.01	V	Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	COBALT COMPOUNDS		0.1	M	N	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
ASBESTOS	1332-21-4	0	A	N	Y	CRESOL, [META-]	108-39-4	1	B	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
BENZENE	71-43-2	2		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
BENZIDINE	92-87-5	0.0003	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CUMENE	98-82-8	10		Y	N	ETHYL ACRYLATE	140-88-5	1		Y	N
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N	ETHYL BENZENE	100-41-4	10		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y	ETHYL CHLORIDE	75-00-3	10		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N	ETHYLENE GLYCOL	107-21-1	10		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2				
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DIAZOMETHANE	334-88-3	1		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N
BERYLLIUM SALTS		2E-05	J	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DIOXINS/FURANS		6E-07	D,V	Y	N	ETHYLENE OXIDE	75-21-8	0.1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DIBENZOFURAN	132-64-9	5	V	Y	N	ETHYLENE THIOUREA	96-45-7	0.6		Y	Y
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	FORMALDEHYDE	50-00-0	2		Y	N
BROMOFORM	75-25-2	10		Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y	GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	HEPTACHLOR	76-44-8	0.02		Y	N
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DICHLOROETHANE, [3,3-]	91-94-1	0.2	V	Y	Y	HEXACHLOROBENZENE	118-74-1	0.01		Y	N
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N	HEXACHLOROXYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	HEXACHLOROXYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N
CAPROLACTAM (Delisted)	105-60-2					DICHLOROMETHANE	75-09-2	10		N	N	HEXACHLOROXYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N
CAPTAN	133-06-2	10		Y	Y	DICHLOROPHOXYACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	HEXACHLOROXYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N

Appendix B: Table of Hazardous Air Pollutants and Screening Model Action Levels (May 3, 2012 Revision 10)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM			
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N			
HEXACHLOROETHANE	67-72-1	5		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N			
HEXAMETHYLENE,-1,6-DIISOCYANATE	822-06-0	0.02		Y	N	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N	VINYL ACETATE	108-05-4	1		Y	N			
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N			
HEXANE, [N-]	110-54-3	10		Y	N	PARATHION	56-38-2	0.1		Y	Y	VINYL CHLORIDE	75-01-4	0.2		Y	N			
HYDRAZINE	302-01-2	0.004		N	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y	XYLENE, [META-]	108-38-3	10	G	Y	N			
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N	XYLENE, [ORTHO-]	95-47-6	10	G	Y	N			
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N	XYLENE, [PARA-]	106-42-3	10	G	Y	N			
HYDROQUINONE	123-31-9	1		Y	N	PHENOL	108-95-2	0.1		Y	N	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N			
INDENO[1,2,3CD]PYRENE	193-39-5	0.01	V	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N									
ISOPHORONE	78-59-1	10		Y	N	PHOSGENE	75-44-5	0.1		Y	N									
LEAD COMPOUNDS		0.01	Q	N	Y	PHOSPHINE	7803-51-2	5		N	N									
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N	Legend								
MALEIC ANHYDRIDE	108-31-6	1		Y	N	PHTHALIC ANHYDRIDE	85-44-9	5		Y	N	Group ID	Aggregate Group Name							
MANGANESE COMPOUNDS		0.8	R	N	Y	POLYCYCLIC ORGANIC MATTER		0.01	V	Y	N	A	Asbestos							
MERCURY COMPOUNDS		0.01	S	N	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y	B	Cresols/Cresylic Acid (isomers and mixtures)							
METHANOL	67-56-1	10		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N	C	2,4 - D, Salts and Esters							
METHOXYCHLOR	72-43-5	10	V	Y	Y	PROPIONALDEHYDE	123-38-6	5		Y	N	D	Dibenzofurans, Dibenzodioxins							
METHOXYETHANOL, [2-]	109-96-4	10	P	Y	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y	E	4, 6 Dinitro-o-cresol, and Salts							
METHYL CHLORIDE	74-87-3	10		Y	N	PROPYLENE OXIDE	75-56-9	5		Y	N	F	Lindane (all isomers)							
METHYL ETHYL KETONE (Delisted)	78-93-3					PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N	G	Xylenes (all isomers and mixtures)							
METHYL HYDRAZINE	60-34-4	0.06		Y	N	QUINOLINE	91-22-5	0.006		Y	N	H	Antimony Compounds							
METHYL IODIDE	74-88-4	1		Y	N	QUINONE	106-51-4	5		Y	N	I	Arsenic Compounds							
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y	J	Beryllium Compounds							
METHYL ISOCYANATE	624-83-9	0.1		Y	N	SELENIUM COMPOUNDS		0.1	W	N	Y	K	Cadmium Compounds							
METHYL METHACRYLATE	80-62-6	10		Y	N	STYRENE	100-42-5	1		Y	N	L	Chromium Compounds							
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	STYRENE OXIDE	96-09-3	1		Y	N	M	Cobalt Compounds							
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y	N	N	Coke Oven Emissions						
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N	O	Cyanide Compounds							
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N	P	Glycol Ethers							
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N	Q	Lead Compounds (except elemental Lead)							
MINERAL FIBERS		0	T	N	Y	TOLUENE	108-88-3	10		Y	N	R	Manganese Compounds							
NAPHTHALENE	91-20-3	10	V	Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N	S	Mercury Compounds							
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	TOLLUIDINE, [ORTHO-]	95-53-4	4		Y	N	T	Fine Mineral Fibers							
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	TOXAPHENE	8001-35-2	0.01		Y	N	U	Nickel Compounds							
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	TRICHLOROBENZENE, [1,2,4-]	120-82-1	10		Y	N	V	Polycyclic Organic Matter							
NICKEL COMPOUNDS		1	U	N	Y	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N	W	Selenium Compounds							
NICKEL REFINERY DUST		0.08	U	N	Y	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N	X	Polychlorinated Biphenyls (Aroclors)							
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y	TRICHLOROETHYLENE	79-01-6	10		Y	N	Y	Radionuclides							
NITROBENZENE	98-95-3	1		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N									
NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N									
NITROPHENOL, [4-]	100-02-7	5		Y	N	TRITHYLAMINE	121-44-8	10		Y	N									
NITROPROPANE, [2-]	79-46-9	1		Y	N	TRIFLURALIN	1582-09-8	9		Y	Y									
Notes																				
						Note 1	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million													

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

RE: New Source Review Permit - Project Number: 2013-06-052

Dear Mr. Ott:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. 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 of Natural Resources' 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: 2013-06-052

Permit Number: