



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2010-026A
Expiration Date: March 15, 2015
Installation ID: 151-0050
Project Number: 2010-06-037

Installation Name and Address

Quaker Window Products Company
504 Highway 63 South
Freeburg, MO 65035
Osage County

Parent Company's Name and Address

Quaker Window Products Company
504 Highway 63 South
Freeburg, MO 65035

Installation Description:

Quaker Window Products Company is a source of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) located in Freeburg, Missouri. The installation manufactures aluminum, vinyl, and wood windows and doors. The main processes located at Quaker Window Products Company are paint spray booths and drying ovens.

SEP 09 2010

Effective Date

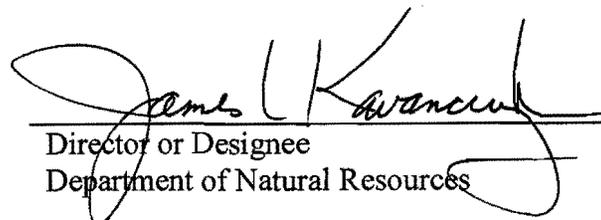

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	4
INSTALLATION DESCRIPTION	4
EMISSION UNITS WITH LIMITATIONS	4
EMISSION UNITS WITHOUT LIMITATIONS.....	5
DOCUMENTS INCORPORATED BY REFERENCE.....	6
II. PLANT WIDE EMISSION LIMITATIONS.....	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	10
EU0010	10
Permit Condition EU0010-001	10
10 CSR 10-6.060	10
Permit Condition EU0010-002.....	12
10 CSR 10-6.260	12
Permit Condition EU0010-003.....	12
10 CSR 10-6.220	12
EU0020	13
Permit Condition (EU0020)	13
10 CSR 10-6.060	13
EU0040 through EU0050	14
Permit Condition (EU0040-EU0050)-001	14
10 CSR 10-3.060	14
Permit Condition (EU0040-EU0050)-002	15
10 CSR 10-6.260	15
EU0090	15
Permit Condition EU0090-001	15
10 CSR 10-6.400	15
10 CSR 10-6.060	15
Permit Condition EU0090-002.....	17
10 CSR 10-6.060	17
EU0120	17
Permit Condition EU0120-001	17
10 CSR 10-6-060	17
EU0140	19
Permit Condition EU0140-001	19
10 CSR 10-6.220	19
EU0210 through EU0570	20
Permit Condition (EU0210-EU0570)-001	20
10 CSR 10-6.260	20
Permit Condition (EU0210-EU0570)-002	20
10 CSR 10-3.060	20
EU0580	21
Permit Condition EU0580	21
IV. CORE PERMIT REQUIREMENTS	22
V. GENERAL PERMIT REQUIREMENTS.....	27

VI. ATTACHMENTS	31
Attachment B	32
Attachment C	33
Attachment D	34
Attachment E	35
Attachment F	36
Attachment G	37
Attachment I	38
Attachment J	39

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Quaker Window Products Company is a source of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) located in Freeburg, Missouri. The installation manufactures aluminum, vinyl, and wood windows and doors. The main processes located at Quaker Window Products Company are paint spray booths and drying ovens.

Raw materials include vinyl, wood, glass, aluminum, and surface coating supplies. The manufacturing lines include, chemical conversion coating of aluminum, fill/debridge cutting process, wood cutting, cold cleaning, petroleum solvent degreasing, and surface coating operations.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	1.30	--	0.98	39.95	0.56	--	7.4
2007	1.38	--	1.12	39.71	0.15	--	10.7
2006	1.40	--	1.00	31.07	0.14	--	7.0
2005	0.42	--	1.14	30.78	0.15	--	8.8
2004	1.11	--	1.05	26.46	0.14	--	1.5

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	2006 EIQ #
EU0010	Pyrolysis Furnace Paint Hooks Burn Off – Propane	EP-03
EU0020	Paint Booth	EP-02
EU0040	Drying Oven	EP-02
EU0050	Paint Bake Oven	EP-02
EU0090	Debridge Cutting of Aluminum and Thermal Fill	EP-32
EU0120	Pack and Ship	EP-36
EU0140	Phoenix 1 Wood Cutting	EP-17
EU0210	Weather-Rite Air Make-Up Unit	
EU0220-EU0450	(24) Infra-Red Paint Bake Oven Burners	EP-30
EU0460-EU0570	(12) Infra-Red Paint Bake Oven Burners	EP-30
EU0580	Etching Process Heaters – Propane (2)	EP-01A

EMISSION UNITS WITHOUT LIMITATIONS

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

<u>Description of Emission Source</u>	<u>2006 EIQ #</u>
Insulation of Doors	
Soap Tank	
Chrome Tank	
Alkaline Cleaning Tank	
Thermal Fill Flush	EP-04
Unpaved Roads	
Aluminum Cutting	EP-06
Small Paint Area near Glass Room (Touch-up)	EP-08
Fuel Tanks (Diesel)	EP-12B
Fuel Tanks (Unleaded)	EP-12A
Boiler 1 – Propane	EP-13
Boiler 2 – Propane	EP-13
Space Heating – Propane	EP-13
Cold Cleaning of Window Parts	EP-16
Vinyl Cutting and Vinyl Welding	EP-18
PVC Cement Usage	EP-19
Sealant Usage	EP-20
LPG Unloading and Storage (2 Tanks)	EP-21
Small Paint Area in New Building	EP-23
Wood Paint Room Paint Booth	EP-25
Parts Cleaner	
Wood Paint Room Conveyor Belt	
Vinyl Round Top – Hot Water Bath Burners (2)	EP-26
Glass Washing	
Maintenance Activities	EP-22
Drilling/Grinding/Punch Press	EP-27
Welders and Acetylene/Oxygen Metal Cutting	EP-28
Wood Cutting (Uncontrolled)	EP-29
Swiggle Strip Sealing (2) (Asbestos Fibers)	
Hand Tool Usage	
Air Conditioners	
Spray Paint Can Paint Filler	
Waste Water Treatment Activities	
Aluminum Scrap Handling	
Waste Loading and Recycling Activities	
Water Bath Heaters for Vinyl Bending (2)	

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

- 1) Construction Permit 0888-003A
- 2) Construction Permit 0894-003
- 3) Construction Permit 0999-012
- 4) Construction Permit 0999-012A
- 5) Construction Permit 072009-021

II. Plant Wide Emission Limitations

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

Permit Condition PW001

10 CSR 10-6.065

Operating Permits

Voluntary Permit Limitation – 10 CSR 10-6.065 (2)(C) and (5)(A)

Emission Limitation:

The permittee shall emit less than one hundred (100) tons of Volatile Organic Compounds (VOC) from the entire installation in any consecutive 12-month rolling average period.

Monitoring/Recordkeeping:

- 1) Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limit. All products containing the VOC in use in the entire installation must be recorded.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) 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.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the limitation.

Permit Condition PW002

10 CSR 10-6.065

Operating Permits

Voluntary Permit Limitation – 10 CSR 10-6.065 (2)(C) and (5)(A)

Emission Limitation:

The permittee shall emit less than one hundred (100) tons of PM₁₀ from the entire installation in any consecutive 12-month rolling average period.

Monitoring/Recordkeeping:

- 1) Attachment G or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitation listed in this permit condition.

- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the limitation.

Permit Condition PW003

10 CSR 10-6.060

Construction Permits Required
Construction Permit 0894-003

Emission Limitation:

If the presence of PM₁₀ (particulate matter less than ten microns) in the ambient air is detected in quantity and duration that directly or approximately causes or contributes to injury to human, plant, or animal life or health, or to property, or that unreasonably interferes with the enjoyment of life or use of property, or is a violation of state rule, then Quaker Window Products Company shall immediately undertake a program that will correct the problem (taken from the Missouri Air Conservation Law, Chapter 642 RSMo).

Monitoring:

The permittee shall conduct monitoring as required in the plan, should one be required.

Record Keeping:

The permittee shall maintain records as required by the plan, should one be required.

Reporting:

The permittee shall submit a plan for PM₁₀ if requested by the Director.

Permit Condition PW004

10 CSR 10-6.060

Construction Permits Required
Construction Permit 0999-012A

Emission Limitation:

The permittee shall emit less than ten (10) tons individually and twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month rolling average period. (Special Condition 1.A)

Monitoring/Recordkeeping:

- 1) Attachment D and Attachment E or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitation listed in Permit Condition

PW005 (Special Condition 1.A). The records must include each individual HAP identified on a Material Safety Data Sheet (MSDS) for the HAP containing products in use in the entire installation. (Special Condition 1.B)

- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used. (Special Condition 1.B)

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records required by Permit Condition PW005 (Special Condition 1.B) indicate that the source exceeds the limitation listed in Permit Condition PW005 (Special Condition 1.A). (Special Condition 1.C)

Permit Condition PW005

10 CSR 10-6.060

Construction Permits Required
Construction Permit 0999-012A

Emission Limitation:

The permittee shall emit less than two (2) tons of Formaldehyde from the entire installation in any consecutive 12-month rolling average period. (Special Condition 2.A)

Monitoring/Recordkeeping:

- 1) Attachment F or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitation listed in Permit Condition PW006 (Special Condition 2.A). All products containing the HAP Formaldehyde in use in the entire installation must be recorded. (Special Condition 2.B)
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used. (Special Condition 2.B)

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records required by Permit Condition PW006 (Special Condition 2.B) indicate that the source exceeds the limitation listed in Permit Condition PW006 (Special Condition 2.A). (Special Condition 2.C)

III. Emission Unit Specific Emission Limitations

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

EU0010
 Pyrolysis Furnace Paint Hooks Burn Off - Propane

General Description:	Pyrolysis Furnace Paint Hooks Burn Off - Propane
Manufacturer/Model #:	Controlled Pyrolysis / Model No. PTR - 1502105
EIQ Reference # (Year):	EP-03 (2006)

Permit Condition EU0010-001
10 CSR 10-6.060

Construction Permits Required
Construction Permit 0888-003A

Emission Limitation:

1. The permittee shall operate the emission unit in accordance with the manufacturer’s instructions and guidelines of operation, to include preheating all chambers to the proper operating temperatures and proper use of all burners to maintain proper operating temperatures. (Special Condition 1)
2. This source shall continue to emit, on an annual basis, below the emission rates established in 10 CSR 10-6.020(3)(A), Table 1, *De Minimis* Emission Levels. (Modified Special Condition 4)

<u>Air Contaminant</u>	<u>Emission Rate (tons/year)</u>
Carbon Monoxide	100.0
Nitrogen dioxide	40.0
Particulate Matter (PM)	25.0
PM ₁₀	15.0
Sulfur Dioxide	40.0
Ozone	40.0
Lead	0.6
Mercury	0.1
Beryllium	0.0004
Asbestos	0.007
Fluorides	3.0
Sulfur acid mist	7.0
Binyl chloride	1.0
Hydrogen sulfide	10.0
Total reduced sulfur	10.0
Reduced Sulfur Compounds	10.0
Hazardous Air Pollutants (each)	10.0
Hazardous Air Pollutants (total)	25.0

3. No person may cause or permit the emission of particulate matter from the chimney, stack or vent of any new incinerator in excess of 0.100 grains of particulate matter per standard dry cubic foot of exhaust gas, corrected to twelve percent (12%) carbon dioxide.
4. No person may cause or permit the emission from any incinerator any air contaminant of a shade or density equal to or darker than, or of such opacity as to obscure an observer's view to a degree equal to or greater than, that designated as No. 1 on the Ringlemann Chart (20% opacity) for new incinerators. Provided that for purposes of starting a fire or charging the incinerator, a person may discharge air contaminants of a shade or density darker than, or of such opacity as to obscure an observer's view to a degree greater than, that designated as No. 2 on the Ringlemann Chart (40% opacity) for periods aggregating not more than six (6) minutes in any sixty (60) consecutive minutes.
5. The incinerator shall be designed and operated so that all gases, vapors and entrained effluents shall, while passing through the final combustion chamber, be maintained at a sufficient temperature to destroy all odor. The Director may approve any other method of odor control found to be equally effective.

Monitoring:

1. The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
3. Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
4. Observations must be made once every two- (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
5. Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
6. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The incinerator shall have affixed to it a set of instructions clearly setting forth in proper sequence the steps necessary to effect the satisfactory operation of the incinerator as well as both the recommended burning rate in pounds per hour and the heat input of the burners in BTUs per hour. The plate shall be conspicuously located so as to be readily visible to the furnace operator. (Special Condition 2)
2. The permittee shall have the manufacturer's instructions and guidelines of operation available at all times at the site upon request. (Special Condition 3)
3. The permittee shall maintain records of all observation results (see Attachment B) noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
4. The permittee shall maintain records of any equipment malfunctions.
5. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition.

6. These records shall be kept for at least five (5) years and shall be made available immediately for inspection to the Department of Natural Resources' personnel upon verbal request or to the Director upon written request.

Reporting:

Records demonstrating noncompliance with the emission limitation shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten (10) days of the month in which the violation occurred.

**Permit Condition EU0010-002
10 CSR 10-6.260**

Restriction of Emission of Sulfur Compounds

Emission Limitation:

1. Emissions from any new source operation shall not contain more than 500 parts per million by volume (500 ppmv) of sulfur dioxide.
2. Emissions from any new source operation shall not contain more than 35 mg per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3) hour time period.
3. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.
4. The emission unit shall be limited to burning only propane.

Monitoring/Record Keeping/Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, prior to any change of fuel type.

**Permit Condition EU0010-003
10 CSR 10-6.220**

Restriction Emission of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than twenty percent (20%).
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to sixty percent (60%).

Monitoring:

1. The permittee shall conduct opacity readings using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures,

then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments A & B), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the opacity limit established by 10 CSR 10-6.220, or any malfunction which could cause an opacity exceedance.

EU0020 Paint Booth

General Description:	Paint booth, Fabric filter
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	EP-2A (2006) CD-2

Permit Condition (EU0020) 10 CSR 10-6.060 Construction Permits Required Construction Permit 0999-012

Emission Limitation:

The permittee shall emit less than 74.8 tons of volatile organic compounds (VOC) from the paint booth (EP-2A) and the curing oven (EP-30A) at this installation in any consecutive twelve (12) month period. (Special Condition 1)

Monitoring:

1. The permittee shall monitor the amount and type of paints/solvents used in the paint booth.
2. The permittee shall maintain good operating and maintenance practices on the paint booth.

Record Keeping:

The permittee shall record the monthly and the sum of the most recent consecutive twelve (12) months VOC emissions in tons from the painting process. These records shall be kept for at least five (5) years and shall be made available immediately for inspection to the Department of Natural Resources personnel upon verbal request or to the Director upon written request. Attachment C, Monthly VOC Emission Tracking Record, or an equivalent form shall be used for this purpose. (Special Condition 2)

Reporting:

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records required by Special Condition 2 show that the emission limitation of Special Condition 1 has been exceeded. (Special Condition 3)

<p>EU0040 through EU0050 EU0040-Drying Oven EU0050-Paint Bake Oven</p>

General Description:	Drying Oven
Manufacturer/Model #:	
EQ Reference # (Year):	EP-2B (2006)

General Description:	Paint Bake Oven
Manufacturer/Model #:	Controlled Pyrolysis/PTR-152105
EQ Reference # (Year):	EP-03 (2006)

<p>Permit Condition (EU0040-EU0050)-001 10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter from Fuel Burning equipment Used for Indirect Heating</p>
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Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 0.51 pounds per million BTU of heat input.
2. The emission unit shall be limited to burning propane.

Monitoring/Record Keeping/Reporting:

The permittee shall report to the Air Pollution Control Program’s Permits Section, P.O. Box 176, Jefferson City, MO 65102, prior to any change of fuel type of characteristics.

Permit Condition (EU0040-EU0050)-002
10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds

Emission Limitation:

1. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight (8) pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three (3) hour time period.
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.
3. The emission unit shall be limited to burning propane.

Monitoring/Record Keeping/Reporting:

The permittee shall report to the Air Pollution Control Program's Permits Section, P.O. Box 176, Jefferson City, MO 65102, prior to any change of fuel type.

EU0090
New Automated Debridge Cutting of Aluminum and Thermal Fill

General Description:	Debridge Cutting of Aluminum and Thermal Fill Bag Filters (2)
Manufacturer/Model #:	Azon Systems, Inc./78-0857 Murphy-Rodgers, Inc. /MRT-9A Bag Filters (2) DK-855 Cyclone DusKolektor (1)
EIQ Reference # (Year):	EP-32 CD-5

Permit Condition EU0090-001
10 CSR 10-6.400
Restriction of Emission of Particulate Matter from Industrial Processes
10 CSR 10-6.060
Construction Permits Required
Construction Permit 072009-021
(Special Condition 3)

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 6.45 lbs/hr from this emission unit.
2. Quaker Window Products shall control emissions from the Debridge Cutting System using a cyclone dust collector. The cyclone dust collector shall be operated and maintained in accordance with the manufacturer's specifications. (Special Condition 3.A)

Monitoring:

1. Visible emissions will be used as an indicator of the proper operation of the control device. During proper operation no visible emissions are expected from this emission unit. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions will

be implemented. Observations will be made using a U.S. EPA Method 22 trained observer and U.S. EPA Method 22 like procedures. (Special Condition 3.B)

- a) Frequency: - Visible emissions from the exhaust shall be monitored on a daily basis when the process is in operation.
- b) Duration: - The duration of the observation shall be for a two (2) minute time period.
- c) Threshold: - The condition of no visible emissions is considered normal for this emission unit. When visible emissions are noted from the emission unit, it shall be documented and corrective actions taken.

The observation of visible emissions from this emission unit will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the applicable requirement. When the level of excursions exceed three percent (3%) of the of the total number of observations in a six (6) month period and corrective actions fail to return the emission unit to a no visible emission condition, then the permittee shall conduct source testing within ninety (90) days of the last excursion to demonstrate compliance with 10 CSR 10-6.400. If the test demonstrates noncompliance with the above emission limitation the permittee shall propose a schedule to implement further corrective actions to bring the source into compliance and demonstrate that compliance.

2. All control equipment shall be maintained and operated according to the manufacturer's specifications.
3. The permittee shall monitor the daily throughput of material for this emission unit.

Record Keeping:

1. The permittee shall maintain records of all observations using Attachment B. At a minimum the following observation conditions shall be noted:
 - a) The date and time of the observation and the weather condition;
 - b) Observations of visible emissions from the emission unit. Note: The absence of visible emission may be reported for all like emission units in a statement such as "No visible emissions were observed from any emission unit(s);" and
 - c) The corrective actions taken during excursions.
2. Maintenance and inspection records shall also be maintained for the control device on this emission unit. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All inspections, corrective actions, and instrument calibration shall be recorded.
4. All records shall be maintained for five (5) years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-6.400.

Permit Condition EU0090-002
10 CSR 10-6.060

Construction Permits Required
Construction Permit 072009-021
(Special Condition 1)

Emission Limitation:

Quaker Window Products shall emit less than 15.0 tons of particulate matter less than ten (10) microns in aerodynamic diameter (PM₁₀) in any consecutive 12 month period from the automated Thermal Fill and Debridge process equipment, EP-31 and EP-32, respectively.

Monitoring/Record Keeping:

Quaker Window Products shall maintain an accurate record of PM₁₀ emitted into the atmosphere from EP-31 and EP-32. Attachment I or an equivalent form shall be used for this purpose. Quaker Window Products shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

Quaker Window Products shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition 1.B. indicate that the source exceeds the limitation of Special Condition 1.A.

EU0120

Pack and Ship

General Description:	Pack and Ship
Manufacturer/Model #:	Various Murphy-Rodgers, Inc./MRT-9A Bag Filters (2)/Cyclone
EIQ Reference # (Year):	EP-36 CD-9A CD-9B

Permit Condition EU0120-001
10 CSR 10.6-060

Construction Permits Required
Construction Permit 0894-003

Emission Limitation:

The bag filters shall be well maintained and used at all times this process is in operation. (Special Condition 5)

Monitoring:

1. Visible emissions will be used as an indicator of the proper operation of the control device. During proper operation no visible emissions are expected from this emission unit. The existence of visible

emissions will indicate a decrease in the efficiency of the control device and corrective actions will be implemented. Observations will be made using a U.S. EPA Method 22 trained observer and U.S. EPA Method 22 like procedures.

- a) Frequency: - Visible emissions from the exhaust shall be monitored on a daily basis when the process is in operation.
- b) Duration: - The duration of the observation shall be for a two (2) minute time period.
- c) Threshold: - The condition of no visible emissions is considered normal for this emission unit. When visible emissions are noted from the emission unit, it shall be documented and corrective actions taken.

The observation of visible emissions from this emission unit will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the applicable requirement. When the level of excursions exceed three percent (3%) of the of the total number of observations in a six (6) month period and corrective actions fail to return the emission unit to a no visible emission condition, then the permittee shall conduct source testing within ninety (90) days of the last excursion to demonstrate compliance with 10 CSR 10-6.400. If the test demonstrates noncompliance with the above emission limitation the permittee shall propose a schedule to implement further corrective actions to bring the source into compliance and demonstrate that compliance.

2. All control equipment shall be maintained and operated according to the manufacturer's specifications.

Record Keeping:

1. The permittee shall maintain records of all observations using Attachment B. At a minimum the following observation conditions shall be noted:
 - a) The date and time of the observation and the weather condition;
 - b) Observations of visible emissions from the emission unit. Note: The absence of visible emission may be reported for all like emission units in a statement such as "No visible emissions were observed from any emission unit(s);" and
 - c) The corrective actions taken during excursions.
2. Maintenance and inspection records shall also be maintained for the control device on this emission unit. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All inspections, corrective actions, and instrument calibration shall be recorded.
4. All records shall be maintained for five (5) years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any violation of this permit condition.

EU0140
Phoenix 1 Wood Cutting

General Description:	Phoenix 1 Wood Cutting Filters (3)
Manufacturer/Model #:	Various Murphy-Rodgers, Inc./MRT-9A Bag Filters (3)
EIQ Reference # (Year):	EP-17 (1996) CD-17

Permit Condition EU0140-001
10 CSR 10-6.220
Restriction Emission of Visible Air Contaminants

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 1.34 lbs/hr from this emission unit.
2. The bag filters shall be well maintained and used at all times this process is in operation.

Monitoring:

Bag Filters operation and maintenance:

1. Check and document the bag filter pressure drop weekly. If the pressure drop falls out of the normal operating range specified by the manufacturer, corrective action shall be taken within eight (8) hours to return the pressure drop to normal.
2. Check the cleaning sequence of the bag filters monthly.
3. Thoroughly inspect bags for leaks and wear quarterly.
4. Inspect every six (6) months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.

If leaks or abnormal conditions are detected, the appropriate measures for remediation shall be implemented within eight (8) hours. Bag replacement should be documented. Maintain a written record of the inspection and any action resulting from the inspection. All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's specifications.

Record Keeping:

1. The permittee shall maintain a written or electronic record of all inspections and any action resulting from the inspection. Attachment J contains a log including these record-keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the opacity limit established by 10 CSR 10-6.220, or any malfunction which could cause an opacity exceedance.

EU0210 through EU0570
EU0210-Weather-Rite Air Make-Up Unit
EU0220-EU0450-24 Infra-Red Paint Bake Oven Burners
EI0460-EU0570-12 Infra-Red Paint Bake Oven Burners

General Description:	Weather-Rite Air Make-Up Unit
Manufacturer/Model #:	1998 Model EOT-121 HHC
EIQ Reference # (Year):	EP-13D (1999 Construction Permit Application)

General Description:	24 Infra-Red Paint Bake Oven Burners
Manufacturer/Model #:	Model #18 X 60
EIQ Reference # (Year):	EP-30B (2006)

General Description:	12 Infra-Red Paint Bake Oven Burners
Manufacturer/Model #:	Model #24 X 60
EIQ Reference # (Year):	EP-30B(2006)

Permit Condition (EU0210-EU0570)-001
10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds

Emission Limitation:

1. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight (8) pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three (3) hour time period.
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.
3. The emission unit shall be limited to burning propane.

Monitoring/Record Keeping/Reporting:

The permittee shall report to the Air Pollution Control Program's Permits Section, P.O. Box 176, Jefferson City, MO 65102, prior to any change of fuel type or characteristics not listed in the permit condition.

Permit Condition (EU0210-EU0570)-002
10 CSR 10-3.060
Maximum Allowable Emissions of Particulate Matter from Fuel Burning equipment Used for Indirect Heating

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 0.60 pounds per million BTU of heat input.
2. The emission unit shall be limited to burning propane.

Monitoring/Record Keeping/Reporting:

The permittee shall report to the Air Pollution Control Program's Permits Section, P.O. Box 176, Jefferson City, MO 65102, prior to any change of fuel type of characteristics.

EU0580 Etching Process Heaters – Propane (2)
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General Description:	Etching Process Heaters – Propane (2)
Manufacturer/Model #:	
EIQ Reference # (Year):	EP-1A (2006)

Permit Condition EU0580 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart A General Provisions and Subpart W National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations
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Work Practice Standards:

1. Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
2. Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
3. Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
4. Use tank covers, if already owned and available at the facility, whenever practicable.
5. Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
6. Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
7. Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
8. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
9. Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
10. Minimize spills and overflow of tanks, as practicable.
11. Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
12. Perform regular inspections to identify leaks and other opportunities for pollution prevention.

Monitoring/Record Keeping/Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any violation of this permit condition.

IV. Core Permit Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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

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

10 CSR 10-6.150 Circumvention

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

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

- 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 10-6.045 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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 1. Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises;
 2. Yard waste;
- (3) 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.
- (4) Quaker Window Products Company may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Quaker Window Products Company fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the

satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.

- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-3.090 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.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

- d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

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

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

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

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

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

None.

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

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

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

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

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Michael Knoll, Executive Vice President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible

person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

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

VI. Attachments

Attachments follow.

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received March 26, 2007;
- 2) Part 70 Operating Permit OP2002-046;
- 3) Part 70 Operating Permit OP2000-097;
- 4) 2006 Emissions Inventory Questionnaire;
- 5) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition:
 - a. Section 1.5 Liquefied Petroleum Gas Combustion, and
 - b. Section 12.19 Electric Arc Welding;
- 6) U.S. EPA database, *Factor Information Retrieval (FIRE) Data System*, Version 6.20;
- 7) Construction Permit 0897-003;
- 8) Construction Permit 1197-022;
- 9) Construction Permit 0798-015;
- 10) Construction Permit 0199-007; and
- 11) Construction Permit 052001-020.

Applicable Requirements Included in the Operating Permit but Not in the Application

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.

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

This rule has been determined to be applicable to the installation and, therefore, has been included in the operating permit.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-3.010, Auto Exhaust Emission Controls

This rule is not included in the operating permit.

10 CSR 10-6.100, *Alternate Emission Limits*

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

10 CSR 10-6.080, *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*

The installation is not subject to these regulations unless they undertake any projects that involve any asbestos containing materials.

Construction Permit Revisions

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

1) *Construction Permit 052001-020*

In a memo dated March 22, 2007, Quaker Window Products Company stated that the equipment listed in this permit was never purchased. Therefore, EP-31 and EP-32, automated Thermal Fill and Debridge process equipment, was assumed to not exist. However, upon review of the operating permit application, it was determined, and confirmed in a letter dated February 23, 2009 from Environmental & Safety Resources (ESR), consultant to Quaker Window Products Company, that the equipment was purchased in 2001 and installed in 2008. As a result, a new construction permit application was submitted to the Air Pollution Control Program. According to ESR, currently, the information from Construction Permit 052001-020 is relevant.

2) *Construction Permit 1197-022*

The emission limitation for particulate matter for Phoenix 1 Wood Cutting (EP-17) in the construction permit is 4.1 lbs/hr. At the maximum hourly design rate (13.19 lb/hr, as indicated in correspondence dated 2/23/09), the uncontrolled PM-10 emission rate is 0.36 lb/hr and the controlled emission rate is 0.036 lbs/hr based on a control efficiency of ninety percent (90%) (as indicated in correspondence dated 2/23/09).

In previous Operating Permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)11, the provisions of this rule do not apply.

3) *Construction Permit 0894-003*

The emission limitation for paint usage and the record keeping and reporting requirements listed in Special Conditions 1 - 3 were replaced by Special Conditions 1 - 3 of Construction Permit 0894-003A when the installation increased the paint usage from eighty two (82) gallons to three hundred (300) gallons. The amended permit did not discuss the particulate matter emissions listed in the permit, therefore Special Conditions 4 and 5 of Construction Permit 0894-003 are still valid and are included in the operating permit.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)11, the provisions of this rule do not apply.

4) *Construction Permit 0888-003A*

The emission limitation for particulate matter for the Pyrolysis Furnace Paint Hooks Burn Off - Propane (EP-03) in the construction permit is 0.3 grains per standard dry cubic foot of exhaust. Based on 10 CSR 6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*, the emission limitation should be 0.100 grains per standard cubic foot of exhaust. Therefore, this limitation was corrected in Permit Condition EU0010-001 Emission Limitation 3.

5) *Construction Permit 0999-012*

The facility requested to amend this permit to add an installation wide Hazardous Air Pollutant (HAP) limit (less than 10/25 tons per year). The Air Pollution Control Program granted the request and included a limitation on Formaldehyde usage. The amended permit did not discuss the VOC emissions listed in the permit, therefore the VOC Special Conditions of Construction Permit 0999-012 are still valid and are included in this operating permit.

6) *Construction Permit 072009-021*

This permit supercedes all elements for Quaker Window Company emission points for Thermal Fill Flush and Debridge Cutting System, respectively EP-04 and EP-05 contained in Missouri Department of Natural Resources, Air Pollution Control Program construction Permit 0894-003. It is important to note that EP-04 and EP-05 processes are being replaced with new equipment, as such are being re-identified as EP-31 and EP-32 (i.e., EP-04 and EP-05 pursuant to this permit issuance will no longer exist as Thermal Fill Flush and Debridge Cutting System process sources). Also important, Permit 0894-003 contains special conditions and elements for other sources not subject to this permit; thus those existing special conditions still apply to the respective permitted sources in Permit 0894-003.

Emission Unit Revisions

The following revisions were made to emission units at this installation:

EU0090

Upon review of the operating permit application, it was determined, and confirmed in a letter dated February 23, 2009, from Environmental & Safety Resources (ESR), consultant to Quaker Window Products Company, that the equipment permitted in Construction Permit 052001-020 was purchased in 2001, and installed in 2008. As a result, a new construction permit application was submitted to the Air Pollution Control Program. According to ESR, currently, the information from the construction permit application submitted in February of 2000, and the subsequent Construction Permit 052001-020, is relevant. The assumption was made that a 2009 construction permit would be issued to Quaker Window Products Company and that it would be similar to Construction Permit 052001-020. Therefore, Permit Conditions EU0090-001 and EU0090-002 from Operating Permit OP2002-046, were included in this Operating Permit.

EU0110

February 23, 2009 correspondence from Environmental & Safety Resources (ESR), consultant to Quaker Window Products Company, stated that this emission point (EP-08) was discontinued in March, 2007, and picked up under EP-23 (for the purposes of recordkeeping) at the Vienna facility. Emission point (EP-23) was moved to the Glass Facility, the new facility on the outskirts of Vienna, MO. Therefore, this emission point was not considered in the review of the facility's operating permit application.

EU0130

In a memo submitted with this Operating Permit application dated March 22, 2007, Quaker Window Products Company stated that the facility no longer uses the Masonite Cutting process. Therefore, EP-10 Masonite Cutting Exhaust does not exist. This emission point was EU0130 in the facility's previous operating permits.

EU0140

This emission point (EP-17) was not listed in the facility's 2006 EIQ. However, the emission point was listed in the facility's 2007 Intermediate Operating Permit application. Further clarification was requested for this emission point. February 23, 2009 correspondence from Environmental & Safety Resources (ESR), consultant to Quaker Window Products Company, provided the clarification needed to complete the review of the facility's operating permit application.

EU0160

February 23, 2009 correspondence from Environmental & Safety Resources (ESR), consultant to Quaker Window Products Company, stated that this emission point (EP-23) was moved to the Glass Facility, the new facility on the outskirts of Vienna, MO. A construction permit is not required for this new facility according to May 2, 2005 correspondence from the Air Pollution Control Program. Therefore, this emission point was not considered in the review of the facility's operating permit application.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

The installation has reported the following storage vessels:

<u>Description of Equipment</u>	<u>Capacity (Gallons)</u>
Gasoline Storage Tanks (Multiple)	< 1,000 each
Diesel Storage Tanks (Multiple)	< 2,000 each
2 Propane Storage Tanks	18,000 each

The storage vessels listed above all meet at least one (1) of the following conditions:

- 1) The tank does not contain a chemical regulated by 40 CFR Part 60, Subpart K, Ka or Kb.
- 2) The tank capacity is below the applicability cutoff level of 40 CFR Part 60, Subpart K, Ka or Kb.

Therefore, the storage tanks are not subject to the NSPS and have been listed as emission units without limitations in the operating permit.

Maximum Available Control Technology (MACT) Applicability

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

40 CFR Part 63, Subpart N, *National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*

This regulation applies to each chromium electroplating or chromium-anodizing tank at installations performing hard chromium electroplating, decorative chromium electroplating or chromium anodizing. The process tanks associated with a chromium electroplating or chromium anodizing process, but in which neither chromium electroplating nor chromium anodizing is taking place, are not subject to the regulation. Examples of such tanks include, but are not limited to, rinse tanks, etching tanks, and cleaning tanks. Likewise, tanks that contain a chromium solution, but in which no electrolytic process occurs, are not subject to this regulation.

According to the installation, the chrome tank is not a chromium electroplating operation; no electricity is involved in the process. Therefore, the installation is not subject to this requirement.

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

40 CFR Part 63, Subpart W, *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*

The installation is subject to the standards and management practices found in W. The only process that is subject is the chromate conversion coating of aluminum. This existing process emits chromium and has implemented the required management practices found in 63.11507(g)(1) through (12).

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

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

The installation does have parts cleaners, but the Safety Kleen solvent used in the process does not contain solvents covered by Subpart T, therefore the MACT was not included in the operating permit.

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

40 CFR Part 63, Subpart III, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production*

This regulation applies to each new and existing flexible polyurethane foam or rebond foam process that meets the following criteria:

- Produces flexible polyurethane or rebond foam;
- Emits a HAP, except as a research and development process; and
- Is located at a plant site that is a major source.

According to the regulation, flexible polyurethane foam is defined as follows: a flexible cellular polymer containing urea and carbamate linkages in the chain backbone, produced by reacting a diisocyanate, polyol and water. Flexible polyurethane foams are open-celled, permit the passage of air through the foam, and possess the strength and flexibility to allow repeated distortion or compression under stress with essential complete recovery upon removal of the stress.

According to the installation, the foam at the installation is produced by reacting a diisocyanate, polyol and water. The polyurethane foam is injected into a door hollow to provide insulation. The foam is exposed to little or no airflow due to it being in a casing. The foam has little to no distortion or compression due to it being in a casing. According to a January 10, 2000 letter from The Environmental Resource Group, Inc.

“The foam used at the installation is a “rigid” foam not a flexible polyurethane foam. The process may have originally used the flexible foam, but current production uses a foam that is rigid. This foam does not possess the strength and flexibility to allow repeated distortion or compression under stress, with essentially complete recovery upon removal of the stress. Additionally, in approximately three (3) to four (4) months, this “foam fill” process will be eliminated from the facility completely.”

Therefore, the MACT was not included in the operating permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to Air Pollution Control Program 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.

Other Regulatory Determinations

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

Emission Units not subject to 10 CSR 10-6.400 because potential to emit is below 0.5 lb/hr.

Emission Unit	MHDR (unit/hr)	% Solids/ % Over-spray	Emission Factor (lb/unit)	Capture Efficiency (%)	Overall Control Device Efficiency (%)	Uncontrolled PM Emission Rate (lb/hr)	Controlled PM Emission Rate (lb/hr)
EU0010	0.005	-	2.6	-	-	0.013	-
EU0020	109 lb	58/25	290	99	98	15.81	0.47
EU0100	1.5 ton	-	0.1	-	-	0.15	-
EU0120	0.05 ton	-	TD	-	76.5	0.8	0.188
EU0140	13.19 lb	-	0.0275	-	90	0.36	0.036
EU0150	250 lb	-	0.35	-	-	0.044	-
EU0170	6.0 lb	62/25	310	99	98	0.93	0.028
EU0180	2000 lb	-	0.35	-	-	0.35	-
EU0190	1.0 lb	-	CP	-	-	0.02	-
EU0200	40 lb	-	0.35	-	-	0.007	-

TD = Test Data

CP = Combined Emission Point – Welding & Cutting

EU0010

The construction permit (0888-003A) for the Pyrolysis Furnace Paint Hooks Burn Off - Propane (EP-03) indicates that the expected concentration of particulate matter is 0.015 grains per dry standard cubic foot of exhaust. This is approximately 6.7 times less than the allowable particulate concentration of 0.100 grains per dry standard cubic foot of exhaust. It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no record keeping or monitoring requirements.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. According to potential to emit calculations, this rule does not apply to EP-03. Based on the maximum hourly design rate of 0.005 tons/hr and the emission factor of 2.6 lb/ton PM₁₀ submitted in the operating permit application, the potential to emit is less than 0.5 lb/hr PM₁₀. Therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)11, the provisions of this rule do not apply.

EU0020

The process is equipped with a fabric filter. At the maximum hourly design rate (109 lbs/hr, as indicated in correspondence dated August 18, 1999), the uncontrolled particulate matter emission rate (15.81 lb/hr) based on the mass balance data (25% overspray and 0.58 lb solids (PM)/lb paint) is approximately twenty seven (27) times greater than the allowable emission rate (0.58 lb/hr). Based on a control efficiency and capture efficiency of ninety eight percent (98%) and ninety nine percent (99%), respectively, the controlled emission rate (0.47 lb/hr) is approximately eighty-one percent (81%) of the allowable emission rate (0.58 lb/hr). The permittee agrees to replace the fabric filters every 80 gallons of paint sprayed in place of monitoring. A record of the filter replacements is required.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)11, the provisions of this rule do not apply.

EU0100

At the maximum hourly design rate (1.5 tons/hr, as indicated in correspondence dated August 18, 1999), the uncontrolled PM₁₀ emission rate (0.15 lbs/hr) based on an emission factor (0.1 lbs PM-10/ton) is approximately 36 times less than the allowable emission rate (5.38 lb/hr). It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no record keeping or monitoring requirements.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit is listed as a source of fugitive emissions of PM₁₀ and has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)7 and (1)(B)11, the provisions of this rule do not apply.

EU0120

At the maximum hourly design rate (0.05 tons/hr, as indicated in correspondence dated May 25, 1999), the uncontrolled PM-10 emission rate (0.8 lb/hr) based on testing data is approximately 1.45 times greater than the allowable emission rate (0.55 lb/hr). The controlled emission rate (0.188 lbs/hr) based on a control efficiency of 76.5% is approximately three (3) times less than the allowable emission rate. It is highly unlikely that the allowable emission rate will be exceeded if the control device is operating properly. Therefore, the record keeping and monitoring requirements are the periodic monitoring of the control device.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)11, the provisions of this rule do not apply.

EU0140

At the maximum hourly design rate (13.19 lb/hr, as indicated in correspondence dated February 23, 2009), the uncontrolled PM-10 emission rate is 0.36 lb/hr and the controlled emission rate is 0.036 lbs/hr based on a control efficiency of ninety percent (90%) (as indicated in correspondence dated February 23, 2009).

In previous Operating Permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)11, the provisions of this rule do not apply.

EU0150

At the maximum hourly design rate (250 lb/hr, as per Construction Permit 0894-003), the uncontrolled particulate matter emission rate (0.044 lbs/hr) based on a similar SCC Emission Factor 3-07-008-02 (0.35 lbs PM/ton) is approximately 23 times less than the allowable emission rate (1.02 lb/hr). It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no record keeping or monitoring requirements.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit is listed as a source of fugitive emissions of PM₁₀ and has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)7 and (1)(B)11, the provisions of this rule do not apply.

EU0170

The process is equipped with a fabric filter. At the maximum hourly design rate (6 lbs/hr, as indicated in correspondence dated 8/18/99), the uncontrolled particulate matter emission rate (0.93 lbs/hr) based on the mass balance data (25% overspray and topcoat 0.62 lb solids (PM)/lb paint) is approximately thirty eight (38) times greater than the allowable emission rate (0.061 lb/hr). Based on a control efficiency and capture efficiency of ninety eight percent (98%) and ninety nine percent (99%), respectively, the controlled emission rate (0.028 lb/hr) is approximately two (2) times less than the allowable emission rate. It is highly unlikely that the allowable emission rate will be exceeded if the control device is operating properly. Therefore, the record keeping and monitoring requirements are the periodic monitoring of the control device.

In previous Operating Permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)11, the provisions of this rule do not apply.

EU0180

At the maximum hourly design rate (2,000 lbs/hr, as indicated in correspondence dated August 18, 1999), the uncontrolled particulate matter emission rate (0.35 lbs/hr) based on a similar SCC Emission Factor 3-07-008-02 (0.35 lbs PM/ton) is approximately 11.7 times less than the allowable emission rate (4.10 lb/hr). It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no record keeping or monitoring requirements.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit is listed as a source of fugitive emissions of PM₁₀ and has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)7 and (1)(B)11, the provisions of this rule do not apply.

EU0190

At the maximum hourly design rate (1 lb/hr, as indicated in correspondence dated August 18, 1999), the maximum amount of welding rod used is assumed to be less than 1 lb/hr. Using a representative AP-42 emission factor of 20.17 lb/1000 lb welding rod, the maximum uncontrolled particulate

matter emission rate for welding is 0.0202 lbs/hr. SCC Emission Factor 3-07-008-02 (0.35 lbs PM/ton) was used for the Acetylene/Oxygen Cutting (0.0002 lbs/hr) for a total hourly emission rate of 0.0204 lbs/hr which is approximately 82% of the allowable emission rate (0.025 lb/hr). It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no record keeping or monitoring requirements.

In previous operating permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit is listed as a source of fugitive emissions of PM₁₀ and has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)7 and (1)(B)11, the provisions of this rule do not apply.

EU0200

At the maximum hourly design rate (40 lbs/hr, as indicated in correspondence dated August 18, 1999), the uncontrolled particulate matter emission rate (0.007 lbs/hr) based on a similar SCC Emission Factor 3-07-008-02 (0.35 lbs PM/ton) is approximately 43 times less than the allowable emission rate (0.30 lb/hr). It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no record keeping or monitoring requirements.

In previous Operating Permits, this emission point was listed to comply with 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*. However, this emission unit is listed as a source of fugitive emissions of PM₁₀ and has a potential to emit PM₁₀ emissions below 0.5 lb/hr, therefore, in accordance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* (1)(B)7 and (1)(B)11, the provisions of this rule do not apply.

Emission Units subject to 10 CSR 10-6.400

Emission Unit	MHDR (unit/hr)	Emission Factor (lb/unit)	Control Device Efficiency (%)	Uncontrolled PM Emission Rate (lb/hr)	Controlled PM Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0090	12,900	0.00234	88.2	30.2	3.56	6.45

EU0090

In May 2001, a construction permit was issued allowing for the replacement of the non-automated Thermal Fill and Debridge process (EP-5 and EP-6) with a newer automated process (EP-31 and EP-32). However, this equipment was never purchased according to a memo submitted to the Air Pollution Control Program on March 26, 2007. Subsequent correspondence with ESR, consultant to the facility, stated that the equipment was purchased in 2001, and installed in 2008. Therefore, the calculations used for Operating Permit OP2002-046 were used for this emission point. At the maximum hourly design rate (12,900 linear foot per hour or 100 lbs/hr, as calculated in the construction permit application dated February 19, 2001), the uncontrolled PM₁₀ emission rate (30.186 lbs/foot) based on an emission factor (.00234 lbs/linear foot) is greater than the allowable emission rate (6.45 lb/hr). The controlled emission rate (3.56 lbs/hr) based on a control efficiency of 88.2% is less than the allowable emission rate. It is highly unlikely that the allowable emission rate will be exceeded if the control device is operating properly. Therefore, the record keeping and monitoring requirements are the periodic monitoring of the control device.

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

Section (1)(2) of this rule exempts combustion equipment that uses exclusively pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, therefore there are no emission limits applied to these units. The rule was included in the operating permit only to state that the units are limited to using pipeline grade natural gas and/or liquefied petroleum gas. The following emission units are exempt from the requirements of this rule.

<u>Equipment</u>	<u>MMBTU/hr</u>	<u>Fuel</u>
Etching Process Heaters - Propane (2)	2.0	LPG
Boiler 1 - Propane	3.12	LPG
Boiler 2 - Propane	1.3	LPG
Space Heating – Propane (Multiple)	6.5	LPG
Vinyl Round Top – Hot Water Bath Burners (2)	0.15	LPG
Water Bath Heaters for Vinyl Bending (2)	0.5	LPG
Pyrolysis Furnace Paint Hooks Burn Off - Propane	0.3	LPG
Combustion Gases from Paint Ovens (2)	2.2	LPG
Bake Ovens in Wood Paint Area – Propane (2)	0.225	LPG
Weather-Rite Air Make-Up Unit	1.3	LPG
(24) Infra-Red Paint Bake Oven Burners	0.045	LPG
(12) Infra-Red Paint Bake Oven Burners	0.06	LPG

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

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

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

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

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