



## DEPARTMENT OF NATURAL RESOURCES

## MISSOURI AIR CONSERVATION COMMISSION

## PERMIT TO CONSTRUCT

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

Permit Number:

042012-001

Project Number: 2011-11-040

Installation Number: 071-0201

Parent Company: Jarden Consumables

Parent Company Address: 555 Theodore Fremd Avenue, Suite C-200, Rye, NY 10580

Installation Name: Rawlings Sporting Goods, Incorporated

Installation Address: #3 Southlink Drive, Washington, MO 63090

Location Information: Franklin County, S17, T44N, R1W

Application for Authority to Construct was made for:

Three paint booths and the associated equipment for the production of sporting goods.

This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

APR 3 2012

EFFECTIVE DATE

*Kyra L. Rose*  
 DIRECTOR OR DESIGNEE  
 DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

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

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

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

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

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

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

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

Page No.	3
Permit No.	
Project No.	2011-11-040

**SPECIAL CONDITIONS:**

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

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

Rawlings Sporting Goods, Incorporated  
Franklin County, S17, T44N, R1W

1. **Superseding Condition**  
The conditions of this permit supersede all of the special conditions found in the following construction permits previously issued by the Air Pollution Control Program.
  - A. 092001-008
  - B. 052003-005
  
2. **Emission Limitation**
  - A. Rawlings Sporting Goods, Incorporated shall emit less than forty (40.0) tons of Volatile Organic Compounds (VOCs) in any consecutive 12-month period from the entire installation.
  
  - B. The entire installation includes all equipment and processes installed or permitted at Rawlings Sporting Goods, Incorporated as of the effective date of this permit. A listing of all new and existing emission units is included in Appendix A.
  
  - C. Attachment A, or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A.
  
3. **Capture Device Requirement – Paint Booths**  
Rawlings Sporting Goods, Incorporated shall use paint booths (CD01, CD02, CD03, and CD04) to capture emissions from the spray coating activities (EU02 and EU04).
  
4. **Control Device Requirement – Overspray Collection System (Paint Booth Filters)**
  - A. Rawlings Sporting Goods, Incorporated shall control particulate emissions from all spray coating activities (EU02 and EU04) using paint booth filters as specified in the permit application.

Page No.	4
Permit No.	
Project No.	2011-11-040

#### SPECIAL CONDITIONS:

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

- B. Replacement filters for the overspray collection system shall be kept on hand at all times. The filters shall have a control efficiency for total particulate of at least 95.0%. Rawlings Sporting Goods, Incorporated shall keep manufacturer's specification sheets on hand indicating an average paint over spray removal efficiency exceeding 95%.
  - C. Rawlings Sporting Goods, Incorporated shall maintain an operating and maintenance log for the overspray collection system which shall include the following:
    - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
    - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
5. Use of Alternative Coatings/Solvents
- A. When considering the use of an alternative material in any of the emission activities evaluated for this permit (EU02-EU04) that is different than a material listed in the Application for Authority to Construct, Rawlings Sporting Goods, Incorporated shall calculate the potential emissions of all individual hazardous air pollutants in the alternative material.
  - B. Rawlings Sporting Goods, Incorporated shall seek approval from the Air Pollution Control Program before use of the alternative material if the potential individual HAP emissions for the alternative material are equal to or greater than the screening model action level (SMAL) for any chemical listed in Appendix B.
  - C. Attachment B or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to show compliance with Special Conditions 5.A. and 5.B.
6. Operational Requirement
- Rawlings Sporting Goods, Incorporated shall keep the solvents and cleaning solutions (EU03) in sealed containers whenever the materials are not in use. Rawlings Sporting Goods, Incorporated shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.
7. Record Keeping and Reporting Requirements
- A. Rawlings Sporting Goods, Incorporated shall maintain all records required

Page No.	5
Permit No.	
Project No.	2011-11-040

**SPECIAL CONDITIONS:**

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

by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used

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

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

Project Number: 2011-11-040  
Installation ID Number: 071-0201  
Permit Number:

Rawlings Sporting Goods, Incorporated  
#3 Southlink Drive  
Washington, MO 63090

Complete: November 22, 2011

Parent Company:  
Jarden Corporation  
555 Theodore Fremd Avenue, Suite C-200  
Rye, NY 10580

Franklin County, S17, T44N, R1W

REVIEW SUMMARY

- Rawlings Sporting Goods, Incorporated has applied for authority to install three new paint booths and relocate an existing booth in their new sporting goods production facility.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are due to the solvents in the coatings and cleaners. HAPs of concern from painting include xylene (all isomers), methyl isobutyl ketone (CAS 108-10-1), and toluene (CAS 108-88-3).
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation.
- None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
  - 40 CFR 63, Subpart M, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, does not apply to the installation because it is not a major source of HAPs.
  - 40 CFR 63, Subparts HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, and XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*, do not apply to this process because the paints do not contain the target HAPs.

- Fabric filters and 3-sided paint booths are being used to control the particulate matter emissions from the spray coating operations.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.
- This installation is located in Franklin County, a nonattainment area for the 8-hour ozone standard and the Particulate Matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) standard and an attainment area for all other criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 100 tons per year for VOC and PM<sub>2.5</sub> and 250 tons per year for all other pollutants. Fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Rawlings Sporting Goods, Incorporated (Rawlings) operates an existing sporting goods manufacturing operation inside of a distribution center located at #3 Westlink Drive in Washington, Missouri. The existing coating processes include stamping baseballs, screen printing clothing, and spray painting helmets. The following permits have been issued to Rawlings Sporting Goods, Incorporated from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
092001-008	baseball stamping; helmet molding, painting, gluing, oven curing and shirt screen printing oven curing
052003-005	2 silk screen lines (each with a screen printer and curing oven)

### PROJECT DESCRIPTION

Rawlings has proposed to construct 3 additional paint booths (CD02, CD03, CD04) to increase the production capacity of their sporting equipment finishing operations. As part of this project, Rawlings has acquired a building located at #3 Southlink Drive, across the street from the existing facility at #3 Westlink Drive. Some of the equipment that is currently in operation at #3 Westlink Drive, including an existing paint booth (CD01), will be moved across the street to the new building. Operations in the two

buildings will be considered the same installation for construction permitting purposes. Since the two buildings are considered the same site and no modeling of air emissions have been required, Rawlings may move equipment between the two buildings without additional permit review just as if they were moving equipment within the same building.

Since the project will be increasing the capacity of an existing operation, Rawlings used historical production information to determine the maximum design rate for each paint booth. The maximum design rate was determined to be 50 sporting good parts, roughly the size of a batter’s helmet, per 8-hour time period, or 6.25 sporting good parts per hour.

Each paint booth has three different activities that generate emissions, (EU02) painting (toners and clearcoat), (EU04) miscellaneous coatings (activators, additives, and sealers), and (EU03) cleaning. The design rates were determined for each activity based on historical data and are summarized in Table 2 below.

Table 2: Maximum Hourly Design Rate (MHDR)

Emission Unit <sup>[1]</sup>	Description	Maximum Application Rate (lb/part)	MHDR per booth (lb/hr)	Project MHDR (3 Booths) (lb/hr)
EU02	Painting (Toners)	0.060	0.375	1.12
EU02	Painting (Clearcoat)	0.061	0.380	1.14
EU04	Misc Coatings (Sealer)	0.076	0.473	1.42
EU04	Misc Coatings (Activator)	0.022	0.138	0.41
EU04	Misc Coatings (Additive)	0.026	0.164	0.49
EU03	Cleaning	0.018	0.110	0.33

<sup>1</sup>Emission unit numbers are consistent with the Missouri Emissions Inventory System (MOEIS). Since the facility is increasing the throughput of existing spray painting processes, new emission unit numbers are not required.

## EMISSIONS/CONTROLS EVALUATION

Potential emissions of VOC and HAPs were calculated using a mass balance approach and assuming 100% emitted. According to the EPA document entitled, *Sources and Control of Volatile Organic Air Pollutants*, APTI Course 482, Third Edition (November 2002) air assisted, high volume low pressure (HVLP) spray coating of flat surfaces can achieve 65% transfer efficiency. Therefore, particulate emissions from the painting activities were calculated using a mass balance approach and assuming a 35% overspray. Painting will occur in a 3-sided paint booth that will have an overspray collection system comprised of a wall of filters. A conservative estimate of the capture efficiency was assumed to be 70% for the 3-sided paint booth. The filter manufacturer’s specifications indicate that the control efficiency will be at least 95.0% for total particulate matter (PM). As there is not a particle size distribution available for this type of painting, all emissions that are not collected by the paint booth filters was assumed to be PM<sub>2.5</sub>.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year.) The facility requested a 40 ton per year limit on emissions from the entire installation in order to avoid being subject to 10 CSR 6.065 *Operating Permits*. The following table provides an emissions summary for this project.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels <sup>[1]</sup>	Existing Potential Emissions <sup>[2]</sup>	Existing Actual Emissions (2006 EIQ) <sup>[3]</sup>	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>2.5</sub>	10.0	N/D	0.01	1.42	N/A
PM <sub>10</sub>	15.0	12.0	0.01	1.42	N/A
SOx	40.0	26.7	0.00	N/A	N/A
NOx	40.0	7.6	0.16	N/A	N/A
VOC	40.0	<40	4.69	12.93	<40
CO	100.0	4.1	0.14	N/A	N/A
HAPs	25.0	18.2	0.00	6.14	N/A
Hexane	10.0	5.7	0.00	N/A	N/A
Toluene	10.0	9.0	0.00	0.79	N/A
Xylene	10.0	0.1	0.00	1.73	N/A
MIBK	10.0	1.1	0.00	2.18	N/A
hydroquinone	1.0	2.3	0.00	N/A	N/A

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

<sup>1</sup>For individual HAPs, the value represents the Screening Model Action Level (SMAL)

<sup>2</sup>Existing potential emissions obtained from projects 2001-06-054 and 2003-01-092

<sup>3</sup>The facility has not been required to submit a full Emissions Inventory Questionnaire (EIQ) since 2006.

### PERMIT RULE APPLICABILITY

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

### APPLICABLE REQUIREMENTS

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

## GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Odors, 10 CSR 10-6.165*
- *Control of Emissions From Industrial Surface Coating Operations, 10 CSR 10-5.330*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*

## STAFF RECOMMENDATION

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

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Kathi Jantz  
Environmental Engineer

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Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated November 21, 2011, received November 22, 2011, designating Jarden Corporation as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- St. Louis Regional Office Site Survey, dated December 9, 2011.
- Material Safety Data Sheets

## Appendix A – Emission Unit Summary

Rawlings Sporting Goods, Incorporated  
 Franklin County, S17, T44N, R1W  
 Project Number: 2011-11-040  
 Installation ID Number: 071-0201  
 Permit Number: \_\_\_\_\_

Permit	Emission Unit ID <sup>[1]</sup>	Description	Control Device ID	Control Device Description	Removed from Service
Existing	EU01	Adhesives	N/A	N/A	N/A
Existing	EU02/EU03	(4) Silk Screen Printing Lines	N/A	N/A	N/A
Existing	EU02/EU03	(14) Pad Printers	N/A	N/A	N/A
Existing	EU05	Shaper/Planer	N/A	N/A	N/A
Existing	EU06	Injection Molding	N/A	N/A	N/A
Existing	EU07	Regrinding/Cutting	N/A	N/A	N/A
Existing	EU08	Drill Presses	N/A	N/A	N/A
Existing	EU09	Fuel Oil Tank	N/A	N/A	N/A
Existing	EU10	Space Heating – Natural Gas	N/A	N/A	N/A
Existing	EU11	Boiler (Natural gas/Diesel)	N/A	N/A	N/A
Existing	EU12	Curing Oven No. 1	N/A	N/A	N/A
Existing	EU13	Curing Oven No. 2	N/A	N/A	N/A
Existing	EU02-EU04	Painting/Misc Coating/Cleaning	CD01	Paint Booth 1	N/A
New	EU02-EU04	Painting/Misc Coating/Cleaning	CD02	Paint Booth 2	N/A
New	EU02-EU04	Painting/Misc Coating/Cleaning	CD03	Paint Booth 3	N/A
New	EU02-EU04	Painting/Misc Coating/Cleaning	CD04	Paint Booth 4	N/A

<sup>1</sup>Emission unit numbers are consistent with the Missouri Emissions Inventory System (MOEIS). Since the facility is increasing the throughput of existing spray painting processes, new emission unit numbers are not required.

## Appendix B: Table of Hazardous Air Pollutants and Screening Model Action Levels (January 5, 2012 Revision 9)

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

## Appendix B: Table of Hazardous Air Pollutants and Screening Model Action Levels (January 5, 2012 Revision 9)

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

## Attachment A – Monthly VOC Compliance Worksheet

Rawlings Sporting Goods, Incorporated  
 Franklin County, S17, T44N, R1W  
 Project Number: 2011-11-040  
 Installation ID Number: 071-0201  
 Permit Number: \_\_\_\_\_

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

Column 1	Column 2	Column 4	Column 5 (a)	Column 6 (b)
Material Used (Name)	Amount of Material Used (Include Units)	Density (Pounds per Gallon)	VOC Content (Weight %)	VOC Emissions (Tons)
(c) Total VOC Emissions Calculated for this Month in Tons:				
(d) Last Month's 12-Month VOC Emissions Total, in Tons:				
(e) Previous Year's Monthly VOC Emissions Total, in Tons:				
(f) Current 12-month Total of VOC Emissions in Tons: [(c) + (d) - (e)]				

**Instructions: This worksheet must include VOC emissions from all emission units installed or permitted at the time of permit issuance.**

- (a) VOC content should be obtained from the Material Safety Data Sheet (MSDS). If the content is given as a range, then the maximum value should be used.
- (b) 1) If usage is in tons - [Column 2] x [Column 5] = [Column 6];  
 2) If usage is in pounds - [Column 2] x [Column 5] x [0.0005] = [Column 6];  
 3) If usage is in gallons - [Column 2] x [Column 4] x [Column 5] x [0.0005] = [Column 6];
- (c) Summation of [Column 6] in Tons;
- (d) 12-Month VOC emissions (f) from last month's Attachment A in Tons;
- (e) Monthly VOC emissions total (c) from the previous year's Attachment A in Tons; and
- (f) Calculate the new 12-month VOC emissions total. A 12-Month VOC emissions total (f) of less than **40.0** tons indicates compliance.

## Attachment B – Evaluation of Alternative Materials

Rawlings Sporting Goods, Incorporated  
 Franklin County, S17, T44N, R1W  
 Project Number: 2011-11-040  
 Installation ID Number: 071-0201  
 Permit Number: \_\_\_\_\_

This sheet covers the month of \_\_\_\_\_. (Copy this sheet as needed.)  
 (New Material Name)

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
Individual HAP Name and CAS No.	Particulate Matter (yes / no)	Captured Emission Factor	HAP Content (weight %)	Production Rate (parts per hour)	Maximum Expected Application (lb/part)	HAP Emission rate (lb/hr)	Individual HAP PTE (tons per year)	Individual HAP SMAL (tons per year)
<i>Benzene 71-43-2</i>	<i>no</i>	<i>1</i>	<i>20.0</i>	<i>25</i>	<i>.02</i>	<i>0.1</i>	<i>0.438</i>	<i>2.0</i>
<i>Cobalt 2-Ethylhexanoate 136-52-7</i>	<i>yes</i>	<i>0.005</i>	<i>1.0</i>	<i>25</i>	<i>0.1</i>	<i>0.0084</i>	<i>0.037</i>	<i>0.1</i>
				<i>25</i>				
				<i>25</i>				
				<i>25</i>				
				<i>25</i>				
				<i>25</i>				

Column 1: This information is reported on the MSDS. Compare each ingredient on the MSDS with the chemical names listed in Appendix B.

Column 2: Appendix B will indicate if the HAP compound is particulate matter.

Column 3: If the HAP is particulate matter, then account for the captured emissions with a factor of  $0.005 = (1 - 0.65)(1 - 0.7)(1 - 0.95)$

Column 4: HAP content should be obtained from the Material Safety Data Sheet (MSDS). If the content is given as a range, then the maximum value should be used.

Column 5: Maximum Production Rate (maximum parts per hour for all 4 paint booths)

Column 6: Expected application rate in pounds per part of the new material (coating or solvent)

Column 7 = [Column 3] x [Column 4]/100 x [Column 5] x [Column 6]

Column 8 = [Column 7] x 8760 / 2000

Column 9: SMAL (tons per year) obtained from Appendix B

**If Column 8 exceeds Column 9 then contact the Air Pollution Control Program's New Source Review Unit to determine if a new permit is required for the new material.**

Mr. Kevin Bowman  
Facility Manager  
Rawlings Sporting Goods, Incorporated  
#3 Westlink Drive  
Washington, MO 63090

RE: New Source Review Permit - Project Number: 2011-11-040

Dear Mr. Bowman:

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:kjl

Enclosures

c: St. Louis Regional Office  
PAMS File: 2011-11-040

Permit Number: