PART 70
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 herein.

Operating Permit Number: OP2017-044
Expiration Date: JUN 02 2022
Installation ID: 011-0042
Project Number: 2014-10-058

Installation Name and Address
Redneck Manufacturing LLC
1705 Gulf Street
Lamar, MO 64759
Barton County

Parent Company's Name and Address
Redneck Manufacturing LLC
1705 Gulf Street
Lamar MO, 64759

Installation Description:
Redneck Manufacturing owns and operates a deer blind production facility in Lamar, Missouri. The manufacturing process takes place at three separate locations. 153 SE 1st Lane, 1705 Gulf Street, and 1101 East 12th Street. All four locations are considered part of the same installation for permitting purposes. The installation is a major source of Volatile Organic Compounds and Hazardous Air Pollutants.

Prepared by
Bern Johnson
Operating Permit Unit

Director or Designee
Department of Natural Resources
JUN 02 2017
Effective Date
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Effective Date
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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION
Redneck Manufacturing owns and operates a deer blind production facility in Lamar, Missouri. Gel coats are applied to a number of open molds. After a short curing period, fiberglass reinforced resins are applied using a chopper gun system before additional curing. The parts are then sanded and prepped before being assembled into units. Screws and rivets will be used to temporarily hold the pieces together before the seams are bonded together with chopped strand mat. After curing, the blinds are rolled to the next station where the shelves are installed with screws and filled with a seam sealer. The blinds are then painted with a water-based paint. Catalysts are used within the resin.

The manufacturing process takes place at three separate locations: 1101 East 12th Street, 153 SE 1st Lane, and 1705 Gulf Street. At the East 12th Street location, gel coat application (EU1) and open flooring (EU5) occur. At the SE 1st Lane location, gel coat application (EU1) and resin (chop gun) application (EU2) occur. At the Gulf Street location, open seaming (EU3), open flooring (EU5), and bonding putty (EU6) occur.

All three locations are considered part of the same installation for permitting purposes. This facility is a major source for VOCs and HAPs. The installation is not a named source; therefore, fugitive emissions are not counted towards major source applicability.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM$_{10}$)</td>
<td>-</td>
<td>1.05</td>
<td>0.81</td>
<td>0.74</td>
<td>-</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM$_{2.5}$)</td>
<td>-</td>
<td>0.96</td>
<td>0.74</td>
<td>0.71</td>
<td>-</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>25.19</td>
<td>19.96</td>
<td>8.00</td>
<td>11.68</td>
<td>5.24</td>
</tr>
<tr>
<td>Styrene (100-42-5)</td>
<td>19.85</td>
<td>15.45</td>
<td>6.81</td>
<td>9.00</td>
<td>5.24</td>
</tr>
<tr>
<td>Methyl Methacrylate (80-62-6)</td>
<td>2.84</td>
<td>2.31</td>
<td>0.06</td>
<td>1.45</td>
<td>-</td>
</tr>
<tr>
<td>Dimethyl Phthalate (131-11-3)</td>
<td>2.47</td>
<td>2.20</td>
<td>1.13</td>
<td>1.23</td>
<td>-</td>
</tr>
<tr>
<td>Xylene (1330-20-7)</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Isopropylbenzene (98-82-8)</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Values in the chart above were taken from the Emissions Inventory Questionnaire that the facility is required to submit every year.
EMISSION UNITS WITH LIMITATIONS
The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

None

EMISSION UNITS WITHOUT LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU4</td>
<td>WATER BASED PAINT (0.31 lb VOC/gal)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1</td>
<td>Gel Coat Application</td>
</tr>
<tr>
<td>EU2</td>
<td>Resin (Chop Gun) Application</td>
</tr>
<tr>
<td>EU3</td>
<td>Open Resin</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU1</td>
<td>Gel Coat Application, Orange Tooling Gel Coat Application, Green Tooling</td>
</tr>
<tr>
<td>EU2</td>
<td>Total Resins (Including Hand Lay-up, Open Molding)</td>
</tr>
<tr>
<td>EU3</td>
<td>Open Resin, Tooling Resin</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU3</td>
<td>Open Seaming</td>
</tr>
<tr>
<td>EU5</td>
<td>Open Flooring</td>
</tr>
<tr>
<td>EU6</td>
<td>Bonding Putty</td>
</tr>
<tr>
<td>EU5</td>
<td>Propane Boiler, 0.399 MMBtu/hr</td>
</tr>
<tr>
<td>EU8</td>
<td>Sanding operation</td>
</tr>
<tr>
<td></td>
<td>Resin Storage Tank, &lt; 75 m³</td>
</tr>
</tbody>
</table>
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 as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

PERMIT CONDITION PW 1
10 CSR 10-6.060 Construction Permits Required
Air Pollution Control Program Construction Permit072016-003, Issued July 12, 2016

Emission Limitations:
The permittee shall not emit styrene in amounts greater than those listed in Table 1 below. [Special Condition 2.A.]

Table 1: Daily Styrene Emission Limits

<table>
<thead>
<tr>
<th>Location</th>
<th>Emission Units</th>
<th>Emission Process</th>
<th>Emission Limit (lb/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>153 SE 1st Lane Location</td>
<td>EU1</td>
<td>Gel Coat Application</td>
<td>47.79</td>
</tr>
<tr>
<td></td>
<td>EU2</td>
<td>Resin (Chop Gun) Application</td>
<td>23.92</td>
</tr>
<tr>
<td></td>
<td>EU3</td>
<td>Open Resin</td>
<td>30.37</td>
</tr>
<tr>
<td>1101 East 12th Street Location</td>
<td>EU1</td>
<td>Gel Coat Application</td>
<td>41.93</td>
</tr>
<tr>
<td></td>
<td>EU1</td>
<td>Orange Tooling Gel Coat Application</td>
<td>8.78</td>
</tr>
<tr>
<td></td>
<td>EU1</td>
<td>Green Tooling Gel Coat Application</td>
<td>5.38</td>
</tr>
<tr>
<td></td>
<td>EU3</td>
<td>Open Resin</td>
<td>65.06</td>
</tr>
<tr>
<td></td>
<td>EU3</td>
<td>Tooling Resin</td>
<td>13.50</td>
</tr>
<tr>
<td>1705 Gulf Street Location</td>
<td>EU3</td>
<td>Open Resin</td>
<td>28.97</td>
</tr>
<tr>
<td></td>
<td>EU6</td>
<td>Adhesive Application</td>
<td>22.67</td>
</tr>
</tbody>
</table>

Operating Time Restrictions
The permittee shall only operate daily between the hours of 6 a.m. to midnight (12 a.m) at the 1st Lane and East 12th Street locations. The permittee shall only operate between the hours of 7 a.m. to midnight.
(12 a.m.) at the Gulf Street location. [Special Condition 4]

**Facility Design Requirements**
Before making significant alterations to the facility design, the permittee shall submit, to the Air Pollution Control Program, an updated Ambient Air Quality Impact Analysis (AAQIA) that shows continued compliance with the styrene RAL. If the facility cannot show continued compliance with the styrene RAL using the new design, it shall contact the Air Pollution Control Program for further instructions. [Special Condition 5.A]

**Operational Requirement**
The permittee shall keep all chemicals, including the gel coats, resins, catalysts, coatings, and adhesives, in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent marking on the containers. [Special Condition 6]

**Control Measures**
1) During gel coat and resin spraying operations, the permittee shall use the controlled spray procedure as outlined in the Composites Fabricators Association’s (CFA’s) “Controlled Spray Handbook.” [Special Condition 3.A]
2) The permittee shall ensure that the mold containment flanges are in place during spraying operations in accordance with the CFA’s “Controlled Spray Handbook.” [Special Condition 3.B]
3) The permittee shall keep records that verify the following, in accordance with the CFA’s “Controlled Spray Handbook.” [Special Condition 3.C.]
   a) The spray gun pressure has been calibrated, at a minimum, once every 3 months.
   b) The operators have been trained in the techniques of controlled spraying.

**Use of Alternative Material and Coatings or Production of Different Deer Blinds**
1) When considering using an alternative gel coat, resin, adhesive, or manufacturing a different type of deer blind than those listed in the Application for Authority to Construct for Permit 072016-003 (Project 2016-02-048), the permittee shall calculate the potential emission of all HAPs (except styrene) and VOCs from the entire installation while using the alternative material or manufacturing the different deer blind. If the potential emissions of VOC from the entire installation are equal to or greater than 218.89 tons per year and individual HAP emissions (except styrene) are greater than their respective SMAL, the permittee shall seek approval form the Air Pollution Control Program before implementing their use. A list of the SMAL can be found on the website: http://dnr.mo.gov/env/apcp/docs/cphapraltbl6.pdf [Special Condition 7.A]

**Monitoring Requirements**
1) Attachment A, or equivalent forms, such as electronic forms, shall be used to demonstrate compliance with the styrene emission limits. The equivalent forms shall contain the same information and use the same calculation method as Attachment A. [Special Condition 2.B]
2) Attachments B and C or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to show compliance with the alternative material requirements. [Special Condition 7.B]

**Record Keeping and Reporting Requirements**
1) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon
request. These records shall include SDS for all materials used. [Special Condition 8.A]

2) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit condition show an exceedance of a limitation imposed by this permit. [Special Condition 8.B]

PERMIT CONDITION PW 2
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

For ease of reference, Tables 3, 4 and 7 of 40 CFR 63 Subpart WWWW (MACT WWWW) are summarized and included in Attachment E of this permit.

Applicability:
1) The affected source consists of all parts of the facility engaged in the following operations: Open molding, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations. [§63.5790(b)]

2) The following operations are specifically excluded from any requirements of MACT WWWW: application of mold sealing and release agents; mold stripping and cleaning; repair of parts not manufactured at the installation, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations; prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in Section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply. [§63.5790(c)]

Emissions and Work Practice Standards:
1) The permittee shall meet the following requirements (The permittee may elect to comply using any options to meet the standards described in §63.5810): [§63.5805]
   a) The permittee shall meet the organic HAP emissions limits in Table 3 to MACT WWWW and the work practice standards in Table 4 to MACT WWWW that apply, regardless of the quantity of HAP emitted (See Attachment E). [§63.5805(c)]
   b) If the permittee performs repair operations subject to MACT WWWW as defined in §63.5935, these repair operations must meet the requirements in Tables 3 and 4 to MACT WWWW. [§63.5805(g)]

Open Molding Organic HAP Emission Factors:
Emissions factors are used to determine compliance with certain organic HAP emissions limits in Table 3 to MACT WWWW. The permittee may use the equations in Table 1 of MACT WWWW to calculate their emissions factors (see Attachment D). Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for the permittee to demonstrate compliance without the need to conduct a HAP emissions test. The permittee may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate their organic HAP emissions. [§63.5796]
**Organic HAP Content:**

1) In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs §63.5797(a) through (c), as applicable. [§63.5797]

   a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. [§63.5797(a)]

   b) If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of Appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee shall use the measured organic HAP content to determine compliance. [§63.5797(b)]

   c) If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee shall use the measured organic HAP content to determine compliance. [§63.5797(c)]

**General Requirements:**

The permittee shall be in compliance at all times with the work practice standards in Table 4 to MACT WWWWW, as well as the organic HAP emissions limits in Table 3 to MACT WWWWW or the organic HAP content limits in Table 7 MACT WWWWW, as applicable, that the permittee is meeting without the use of add-on controls. (See Attachment E) [§63.5835(a)]

**Open Molding Compliance Options:**

1) The permittee shall use one of the following methods in §63.5810(a) through (d) to meet the standards for open molding operations in Table 3 to MACT WWWWW. The permittee may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, and using covered curing techniques. The permittee may use different compliance options for the different operations listed in Table 3 to MACT WWWWW. The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in paragraphs §63.5810 (a) through (d). When the permittee switches to an option based on a 12-month rolling average, the permittee shall base the average on the previous 12 months of data calculated using the compliance option the permittee is switching to, unless the permittee previously used an option that did not require the permittee to maintain records of resin and gel coat use. In this case, the permittee shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after switching options. [§63.5810]

   a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 to MACT WWWWW. [§63.5810(a)]
i) Calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee shall calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to MACT WWWW for open molding. [§63.5810(a)(1)]

ii) If the calculated emission factor is less than or equal to the appropriate emission limit, the permittee has demonstrated that this process stream complies with the emission limit in Table 3 to MACT WWWW. It is not necessary that all the process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in §63.5810(b) through (d), then all process streams using that individual resin or gel coat shall be included in the averaging calculations. [§63.5810(a)(2)]

b) Demonstrate that, on average, the permittee meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type. Demonstrate that on average the permittee meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to MACT WWWW that applies. [§63.5810(b)]

i) Group the process streams described in §63.5810(a) by operation type and resin application method or gel coat type listed in Table 3 to MACT WWWW and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in §63.5810(a)(1) and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of §63.5810.

\[
\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Process Stream EF}_i \times \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}
\]

Equation 2

Where:
Actual Process Stream EF = actual organic HAP emissions factor for process stream i, lbs/ton;
Material = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i, tons;
n = number of process streams where you calculated an organic HAP emissions factor. [§63.5810(b)(1)(i)]

ii) The permittee may, but is not required to, include process streams where the permittee has demonstrated compliance as described in §63.5810(a), subject to the limitations described in §63.5810(a)(2), and the permittee is not required to and should not include process streams for which the permittee will demonstrate compliance using the procedures in §63.5810(d). [§63.5810(b)(1)(ii)]

iii) Compare each organic HAP emissions factor calculated in §63.5810(b)(1) with its corresponding organic HAP emissions limit in Table 3 to MACT WWWW. If all emissions
factors are equal to or less than their corresponding emission limits, then the permittee is in compliance. [§63.5810(b)(2)]

c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 to MACT WWWWW that applies. When using this option, the permittee shall demonstrate compliance with the weighted average organic HAP emissions limit for all the open molding operations. [§63.5810(c)]

i) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emissions limit the permittee must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 to MACT WWWWW for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 3 of §63.5810.

\[
\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n} (EL_i \times \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}
\]

Where:
- \(EL_i\) = organic HAP emissions limit for operation type i, lbs/ton from Table 3 to MACT WWWWW;
- \(\text{Material}_i\) = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;
- \(n\) = number of operations. [§63.5810(c)(1)]

ii) Each month calculate the weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors calculated in §63.5810(b)(1) and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4 of §63.5810.

\[
\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Operation } EF_i \times \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}
\]

Where:
- Actual Individual \(EF_i\) = Actual organic HAP emissions factor for operation type i, lbs/ton;
- \(\text{Material}_i\) = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;
- \(n\) = number of operations. [§63.5810(c)(2)]

iii) Compare the values calculated in §63.5810(c)(1) and (2). If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the permittee is in compliance. [§63.5810(c)(3)]

d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling. [§63.5810(d)]

i) For any combination of manual resin application, mechanical resin application, or filament application, the permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods
listed in this paragraph. Table 7 to MACT WWWW presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to MACT WWWW, the resin is in compliance. [§63.5810(d)(1)]

ii) The permittee may also use a weighted average organic HAP content for each application method described in §63.5810(d)(1). Calculate the weighted average organic HAP content monthly. Use Equation 2 in §63.5810(b)(1) except substitute organic HAP content for organic HAP emissions factor. The permittee is in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to MACT WWWW. [§63.5810(d)(2)]

iii) The permittee may simultaneously use the averaging provisions in §63.5810(b) or (c) to demonstrate compliance for any operations and/or resins the permittee did not include in the compliance demonstrations in §63.5810(d)(1) and (2). However, any resins for which the permittee claims compliance under the option in §63.5810(d)(1) and (2) may not be included in any of the averaging calculations described in §63.5810(b) or (c). [§63.5810(d)(3)]

iv) The permittee does not have to keep records of resin use for any of the individual resins where the permittee demonstrates compliance under the option in §63.5810(d)(1) unless the permittee elects to include that resin in the averaging calculations described in §63.5810(d)(2). [§63.5810(d)(4)]

**Continuous Compliance:**

1) The permittee shall demonstrate continuous compliance with each applicable standard in §63.5805 according to the following methods: [§63.5900(a)]

   a) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 to MACT WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(2)]

   b) Compliance with organic HAP content limits in Table 7 to MACT WWWW is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to MACT WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to MACT WWWW, as discussed in §63.5895(d). [§63.5900(a)(3)]

   c) Compliance with the work practice standards in Table 4 to MACT WWWW is demonstrated by performing the work practice required. [§63.5900(a)(4)]

2) The permittee shall report each deviation from the applicable standards in §63.5805. The deviations shall be reported according to the requirements in §63.5910. [§63.5900(b)]

3) During periods of startup, shutdown or malfunction, the permittee shall meet the applicable organic HAP emissions limits and work practice standards. [§63.5900(c)]

4) Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources are not violations if the permittee demonstrates to the Administrator's satisfaction that the permittee was operating in accordance with §63.6(e)(1). The Administrator will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e). [§63.5900(e)]
**Monitoring/Recordkeeping:**

1) The permittee shall retain records of resin and gel coat use, organic HAP content, and operation where the resin is used to meet any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 to MACT WWW. The permittee shall retain records of resin and gel coat use, organic HAP content, and operation where the resin is used to meet any organic HAP content limits in Table 7 to MACT WWW when averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [§63.5895(c)]

2) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, the permittee shall retain the records of resin and gel coat organic HAP content, and the permittee shall include the list of these resins and gel coats and identify their application methods in each semi-annual compliance report. If after having initially demonstrated that a specific combination of an individual resin or gel coat and application method meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the permittee changes the application method, then the permittee shall again demonstrate that the individual resin or gel coat meets its emission limit as specified in §63.5810(a). If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 of MACT WWW, the permittee shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average. [§63.5895(d)]

3) The permittee shall retain the following records: [§63.5915(a)]
   a) A copy of each notification and report that the permittee submitted to comply with MACT WWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiii). [§63.5915(a)(1)]
   b) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [§63.5915(a)(2)]

4) The permittee shall retain all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7 to MACT WWW. [§63.5915(c)]

5) The permittee shall retain a certified statement that the permittee is in compliance with the work practice requirements in Table 4 to MACT WWW, as applicable. [§63.5915(d)]

6) The permittee shall retain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]

7) As specified in §63.10(b)(1), the permittee shall retain each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]

8) The permittee shall retain each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years. [§63.5920(c)]

9) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

**Reporting:**

1) The permittee shall submit each report in Table 14 to MACT WWW that applies. [§63.5910(a)]
2) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee shall submit each report by the date specified in Table 14 to MACT WWWW and according to the following requirements: [

- Compliance reports shall cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.5910(b)(3)]
- Compliance reports shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.5910(b)(4)]
- As the permittee is subject to permitting requirements under 40 CFR Part 70, the permittee may submit their 40 CFR Part 63 Subpart WWWW compliance reports in conjunction with their 40 CFR Part 70 semi-annual monitoring reports. [§63.5910(b)(5)]

3) The compliance report shall contain the information in following: [§63.5910(c)]
- Company name and address. [§63.5910(c)(1)]
- Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
- Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
- If the permittee had a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with their startup, shutdown, and malfunction plan, the compliance report shall include the information in §63.10(d)(5)(i). [§63.5910(c)(4)]
- If there are no deviations from any organic HAP emissions limitations, and there are no deviations from the requirements for work practice standards in Table 4 to MACT WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]

4) For each deviation from an organic HAP emissions limitation and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report shall contain the information in §63.5910(c)(1) through (4) and in §63.5910(d)(1) and (2). This includes periods of startup, shutdown, and malfunction. [§63.5910(d)]
- The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]
- Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]

5) Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 shall report all deviations as defined in this subpart in the semi-annual monitoring report required by §70.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to MACT WWWW along with, or as part of, the semi-annual monitoring report required by §70.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.5910(g)]

6) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to MACT WWWW, and not based on the requirements in §63.999. [§63.5910(h)]

7) Where multiple compliance options are available, the permittee shall state in each compliance report if the permittee has changed compliance options since their last compliance report. [§63.5910(i)]

8) If the facility meets or exceeds 100 tpy in actual HAP emissions in any calendar year, the permittee shall notify the Air Pollution Control Program in the required compliance report. The permittee may
at the same time request a one-time exemption from the requirements of paragraph §63.5805(a)(1) or §63.5805(d) in the facility’s report if the permittee can demonstrate all of the following:

a) The exceedance of the threshold was due to circumstances that will not be repeated.

b) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.

c) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in §63.5799. [§63.5805 (e)]

9) The permittee shall report any deviations of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semiannual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

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<th>Table 14 to MACT WWWW – Requirements for Reports</th>
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<td>The permittee shall submit a...</td>
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<td>1. Compliance report</td>
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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 as of the date that this permit is issued.

None
IV.  Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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 as of the date that this permit is issued. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

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) 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.

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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(6)(C)3.B]


1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
3) 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.

### 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 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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. This odor evaluation shall be taken at a location outside of the installation’s property boundary.

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

Emission Limitation:

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.

Monitoring:

The installation has an uncontrolled PTE of only 4.49 tons per year PM; therefore, no monitoring, recordkeeping, or reporting is necessary to demonstrate compliance.

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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

### 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.
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:
   a) 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.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) 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:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
   b) 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.
   c) 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.

5) 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
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(6)(C)1.B  Permit Duration
10 CSR 10-6.065(6)(E)3.C  Extension of Expired Permits

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065(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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. 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.A 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 semiannual 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(6)(C)1.D  Risk Management Plan Under Section 112(r)
If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(6)(C)1.F  Severability Clause
In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G  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 pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H  Incentive Programs Not Requiring Permit Revisions
No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.
10 CSR 10-6.065(6)(C)1.1 Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
   a) The applicable requirements are included and specifically identified in this permit, or
   b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7 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(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit.
(including a work practice standard) or a federally enforceable emissions cap that the source has
assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an
express permit term may be made without a permit revision, except for changes that would violate
applicable requirements of the Act or contravene federally enforceable monitoring (including test
methods), record keeping, reporting or compliance requirements of the permit.

   a) Before making a change under this provision, The permittee shall provide advance written notice
to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO
65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the
changes to be made, the date on which the change will occur, and any changes in emission and
any permit terms and conditions that are affected. The permittee shall maintain a copy of the
notice with the permit, and the APCP shall place a copy with the permit in the public file.
Written notice shall be provided to the EPA and the APCP as above at least seven days before
the change is to be made. If less than seven days notice is provided because of a need to respond
more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and
the APCP as soon as possible after learning of the need to make the change.

   b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted operations, activities or
emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a
permit revision. Insignificant activities listed in the application, but not otherwise addressed in or
prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the
off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I
modification;

   b) The permittee must provide contemporaneous written notice of the change to the Air Pollution
Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as
EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for
changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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.

   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; and

   d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Russ Hurt, Director of
Manufacturing. 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(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,

2) 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,

3) 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,

4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or

5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065(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.
### Styrene Emissions Compliance Worksheet

**Date (Month/Day/Year):**

<table>
<thead>
<tr>
<th>Type of Process</th>
<th>Usage per day (lb/day)</th>
<th>(a) Emission Factors (lb/ton or % Content)</th>
<th>(b) Emissions (lb/day)</th>
<th>Emissions Limit (lb/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>153 SE 1st Lane Location</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gelcoat Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resin (Chop Gun) Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resin Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Styrene Monomer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Patchaid</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Optiplus</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>1101 East 12th Street Location</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gelcoat Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Orange Tooling Gelcoat</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green Tooling Gelcoat</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resin Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Styrene Monomer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Patchaid</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Optiplus</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tooling Resin</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>1705 Gulf Street Location</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resin Application</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Styrene Monomer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Patchaid</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Optiplus</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Adhesive Application</strong></td>
<td></td>
<td></td>
<td></td>
<td>24.00</td>
</tr>
</tbody>
</table>

(a) Emission factors, in lb/ton, for the Gelcoat Application, Resin (Chop Gun) Application, and Open Resin (including resin, styrene monomer, patchaid, and optiplus) should be taken from the Table “Unified Emission Factors for Open Molding of Composites.” Emission factors (% Content) for the adhesive application shall be taken from the Safety Data Sheets (SDS) of the resins. If a range is given, the highest number shall be used.

(b) Emissions (lb/day) for the Gelcoat Application, Resin (Chop Gun) Application, and Open Resin (including resin, styrene monomer, patchaid, and optiplus) calculated from as Usage per day (lb/day) / 2,000 lb/ton x Emission Factor (lb/ton). Emissions from adhesive application (lb/day) calculated as Usage per day (lb/day) x % Styrene Content

**Daily emissions no greater than the Emissions Limit (lb/day) indicate compliance. For the Rein Application, Styrene Monomer, Patchaid, and Optiplus, the Emissions Limit (lb/da) is the total allowed between all of these processes.**
## Attachment B
### MMA Calculations

Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Type of Process</th>
<th>Maximum Usage per Blind (lb/day)</th>
<th>(a) Emission Factors (lb/ton or % Content)</th>
<th>(b) Emissions (lb/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gelcoat Application</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resin (Chop Gun) Application</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open Resin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>153 SE 1st Lane Location</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gelcoat Application</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Orange Tooling Gelcoat</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green Tooling Gelcoat</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open Resin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tooling Resin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1101 East 12th Street Location</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gelcoat Application</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open Resin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adhesive Application</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1705 Gulf Street Location</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open Resin</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(a) Emission factors, in lb/ton, for the Gelcoat Application, Resin (Chop Gun) Application, and Open Resins should be taken from the Table “Unified Emission Factors for Open Molding of Composites.”

Emission factors, in % Content, for Adhesive Application shall be taken from the SDS for the adhesive. If a range of values is listed on the SDS, use the highest value in the range to demonstrate compliance.

(b) Emissions (lb/day) for the Gelcoat Application, Resin (Chop Gun) Application, and Open Resins calculated from \([\text{Column 2} ÷ 2,000 \text{ lb/ton}] \times \text{Column 3}\).

Emissions from Adhesive Application (lb/day) calculated by using Column 2 x Column 3.

**For MMA, the permittee may use the alternative material if emissions do not exceed its SMAL, which is 10 tpy. Column 4 gives emission rates in lb/day. Tons per year can be calculated using (lb/day) x 365 days/yr ÷ 2,000 lb/ton**
## Individual HAP and VOC Emissions Calculations from Alternative Material (Other than Styrene and MMA)

### Individual HAPs

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
<th>Column 6</th>
<th>Column 7</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material</td>
<td>MHDR (gal/hr)</td>
<td>Density (lb/gal)</td>
<td>HAP Name, CAS #</td>
<td>(c) Individual HAP Content (Wt. %)</td>
<td>(a) Individual HAP PTE (tpy)</td>
<td>(b) SMAL (tpy)</td>
</tr>
<tr>
<td>Example</td>
<td>1.67</td>
<td>8.75</td>
<td>Toluene</td>
<td>3.0%</td>
<td>1.92</td>
<td>10.0</td>
</tr>
</tbody>
</table>

(a) Individual HAP PTE (tpy) calculated using $(\text{Column 2}) \times (\text{Column 3}) \times (\frac{(\text{Column 5})}{100}) \times \frac{8760 \text{ hours/yr}}{2000 \text{ lb/ton}}$

(b) SMAL can be found on-line at [http://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf](http://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf)

(c) The individual HAP content shall be obtained from the SDS for the alternative material. If a range of values is provided, use the highest value in the range to demonstrate compliance.

### VOC

<table>
<thead>
<tr>
<th>Location</th>
<th>EU</th>
<th>Material</th>
<th>Usage (lb/day)</th>
<th>(a) VOC % not Styrene</th>
<th>(b) VOC PTE (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>12th</td>
<td>1</td>
<td>Gelcoat</td>
<td>500.45</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>12th</td>
<td>1</td>
<td>Orange Tooling Gelcoat</td>
<td>49.97</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>12th</td>
<td>1</td>
<td>Green Tooling Gelcoat</td>
<td>50.04</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>1st Lane</td>
<td>1</td>
<td>Gelcoat</td>
<td>419.85</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>1st Lane</td>
<td>2</td>
<td>Resin Application</td>
<td>799.93</td>
<td>16%</td>
<td>23.35795308</td>
</tr>
<tr>
<td>12th Street</td>
<td>3</td>
<td>Resin Catalyst</td>
<td>8.13</td>
<td>45%</td>
<td>0.667908828</td>
</tr>
<tr>
<td>12th Street</td>
<td>3</td>
<td>Hand Layup Resin Application</td>
<td>2103.20</td>
<td>16%</td>
<td>61.4133309</td>
</tr>
<tr>
<td>12th Street</td>
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<td>Resin Catalyst</td>
<td>21.35</td>
<td>45%</td>
<td>1.753260674</td>
</tr>
<tr>
<td>12th Street</td>
<td>3</td>
<td>P-17 Resin</td>
<td>1.54</td>
<td>20%</td>
<td>0.056204051</td>
</tr>
<tr>
<td>12th Street</td>
<td>3</td>
<td>Styrene Monomer</td>
<td>27.08</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>12th Street</td>
<td>3</td>
<td>Flex-Z 1.0</td>
<td>27.47</td>
<td>100%</td>
<td>5.0126472</td>
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<tr>
<td>12th Street</td>
<td>3</td>
<td>Sealer GP</td>
<td>27.14</td>
<td>100%</td>
<td>4.95378</td>
</tr>
<tr>
<td>12th Street</td>
<td>3</td>
<td>Patchaid</td>
<td>27.42</td>
<td>1.08%</td>
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<tr>
<td>12th Street</td>
<td>3</td>
<td>Optiplus</td>
<td>27.19</td>
<td>12.10%</td>
<td>0.60047578</td>
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<tr>
<td>12th Street</td>
<td>3</td>
<td>Hardener</td>
<td>27.36</td>
<td>0%</td>
<td>0</td>
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<tr>
<td>12th Street</td>
<td>3</td>
<td>Tooling Resin</td>
<td>150.01</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>1st Lane</td>
<td>3</td>
<td>Hand Layup Resin Application</td>
<td>699.32</td>
<td>16%</td>
<td>20.42014867</td>
</tr>
<tr>
<td>1st Lane</td>
<td>3</td>
<td>Resin Catalyst</td>
<td>7.12</td>
<td>45%</td>
<td>0.584420225</td>
</tr>
<tr>
<td>1st Lane</td>
<td>3</td>
<td>P-17 Resin</td>
<td>9.24</td>
<td>20%</td>
<td>0.337224303</td>
</tr>
<tr>
<td>1st Lane</td>
<td>3</td>
<td>Styrene Monomer</td>
<td>8.98</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>1st Lane</td>
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<td>Flex-Z 1.0</td>
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<td>100%</td>
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<td>1st Lane</td>
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<td>Sealer GP</td>
<td>8.88</td>
<td>100%</td>
<td>1.62065475</td>
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<tr>
<td>1st Lane</td>
<td>3</td>
<td>Patchaid</td>
<td>9.09</td>
<td>1.08%</td>
<td>0.017915507</td>
</tr>
<tr>
<td>1st Lane</td>
<td>3</td>
<td>Optiplus</td>
<td>9.12</td>
<td>12.10%</td>
<td>0.201315579</td>
</tr>
<tr>
<td>1st Lane</td>
<td>3</td>
<td>Hardener</td>
<td>9.18</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Hand Layup Resin Application</td>
<td>900.54</td>
<td>16%</td>
<td>26.29575749</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Resin Catalyst</td>
<td>9.15</td>
<td>45%</td>
<td>0.751397432</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>P-17 Resin</td>
<td>11.84</td>
<td>20%</td>
<td>0.43233885</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Styrene Monomer</td>
<td>11.57</td>
<td>0%</td>
<td>0</td>
</tr>
</tbody>
</table>
**Gelcoats and Resins**

<table>
<thead>
<tr>
<th>Location</th>
<th>EU</th>
<th>Material</th>
<th>Usage (lb/day)</th>
<th>(a) VOC % not Styrene</th>
<th>(b) VOC PTE (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Flex-Z 1.0</td>
<td>11.76</td>
<td>100%</td>
<td>2.1455649</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Sealer GP</td>
<td>11.61</td>
<td>100%</td>
<td>2.1196425</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Patchaid</td>
<td>11.71</td>
<td>1.08%</td>
<td>0.023077602</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Optiplus</td>
<td>11.63</td>
<td>12.10%</td>
<td>0.256850912</td>
</tr>
<tr>
<td>Gulf</td>
<td>3</td>
<td>Hardener</td>
<td>11.70</td>
<td>0%</td>
<td>0</td>
</tr>
<tr>
<td>Gulf</td>
<td>6</td>
<td>Adhesive</td>
<td>119.02</td>
<td>0%</td>
<td>0</td>
</tr>
</tbody>
</table>

(c) Gelcoats and Resins VOC PTE (tpy) =

a) Obtained from the SDS for the material. If a range of values is provided, use the highest value in the range to demonstrate compliance.

b) VOC PTE (tpy) = Usage (lb/day) x VOC % not Styrene / 2000 lb/ton x 365 days/yr.

c) Gelcoats and Resins VOC PTE (tpy) = the sum of the VOC PTE (tpy) for each gelcoat and resin currently in use.

**Paint (based on Blind Type)**

<table>
<thead>
<tr>
<th>Blind Type</th>
<th>Paint/Blind (gal/blind)</th>
<th>Blind/Day</th>
<th>(d) Density (lb/gal)</th>
<th>(e) VOC Cont (lb/gal)</th>
<th>(f) VOC PTE (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 X 5 C/O</td>
<td>5.2</td>
<td>11.98</td>
<td>0.31</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 X 6 Shoot</td>
<td>8.43</td>
<td>11.98</td>
<td>0.31</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 X 6 C/O</td>
<td>7.1</td>
<td>11.98</td>
<td>0.31</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 X 6 C/O</td>
<td>8.74</td>
<td>11.98</td>
<td>0.31</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(g) Paint VOC PTE (tpy):

d) Obtained from the SDS for the material.

e) Obtained from the SDS for the material. If a range of values is provided, use the highest value in the range to demonstrate compliance.

f) VOC PTE (tpy) = Paint/Blind (lb/blind) x blinds/day / Density (lb/gal) x VOC Cont (lb/gal) / 2000 lb/ton x 365 days/yr

g) Paint VOC PTE (tpy) = the maximum VOC PTE (tpy) of the different blind types currently produced.

**Propane Combustion**

<table>
<thead>
<tr>
<th>MHDR</th>
<th>EF (lb/1000 gal)</th>
<th>VOC PTE (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.399 MMBtu/hr</td>
<td>0.0043607</td>
<td>1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>VOC PTE (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.02</td>
</tr>
</tbody>
</table>

**Installation VOC Emissions**

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>VOC PTE (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Styrene Emissions</td>
<td>62.61</td>
</tr>
<tr>
<td>(c) Gelcoats and Resins</td>
<td></td>
</tr>
<tr>
<td>(g) Paint</td>
<td>0.02</td>
</tr>
<tr>
<td>Propane</td>
<td></td>
</tr>
</tbody>
</table>

(h) Installation VOC PTE (tpy) = the sum of the VOC PTE (tpy) from each emission source. The installation may use the alternative material or produce the alternative blind type if the Installation VOC PTE is while using the alternative material or producing the alternative blind type is less than 218.89 tons per year.
## ATTACHMENT D
Equations To Calculate Organic HAP Emission Factors

Table 1 to Subpart WWWWWW of Part 63 — Equations To Calculate Organic HAP Emissions Factors for Specific Open Molding Process Streams

<table>
<thead>
<tr>
<th>Operation</th>
<th>Type of Coating Application</th>
<th>Process Description</th>
<th>Organic HAP Emission Factor Equation(^1,2) (lb/ton resin/gel coat applied)</th>
<th>Materials Containing &lt; 33% HAPs</th>
<th>Materials Containing ≥ 33% HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manual resin application</td>
<td>Nonvapor-suppressed resin</td>
<td>EF = 0.126 x %HAP x 2000</td>
<td>EF = ((0.286 x %HAP) – 0.0529) x 2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Vapor-suppressed resin</td>
<td>EF = 0.126 x %HAP x 2000 x (1 – (0.5 x VSE factor))</td>
<td>EF = ((0.286 x %HAP) – 0.0529) x 2000 x (1 – (0.5 x VSE factor))</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Atomized mechanical resin</td>
<td>Nonvapor-suppressed resin</td>
<td>EF = 0.169 x %HAP x 2000</td>
<td>EF = ((0.714 x %HAP) – 0.18) x 2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>application</td>
<td>Vapor-suppressed resin</td>
<td>EF = 0.169 x %HAP x 2000 x (1 – (0.45 x VSE factor))</td>
<td>EF = ((0.714 x %HAP) – 0.18) x 2000 x (1 – (0.45 x VSE factor))</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nonatomized</td>
<td>Nonvapor-suppressed resin</td>
<td>EF = 0.107 x %HAP x 2000</td>
<td>EF = ((0.157 x %HAP) – 0.0165) x 2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>mechanical resin application</td>
<td>Vapor-suppressed resin</td>
<td>EF = 0.107 x %HAP x 2000 x (1 – (0.45 x VSE factor))</td>
<td>EF = ((0.157 x %HAP) – 0.0165) x 2000 x (1 – (0.45 x VSE factor))</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Filament application(^3)</td>
<td>Nonvapor-suppressed resin</td>
<td>EF = 0.184 x %HAP x 2000</td>
<td>EF = ((0.2746 x %HAP) – 0.0298) x 2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Vapor-suppressed resin</td>
<td>EF = 0.12 x %HAP x 2000</td>
<td>EF = ((0.2746 x %HAP) – 0.0298) x 2000 x 0.65</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Atomized spray gel coat</td>
<td>Nonvapor-suppressed resin</td>
<td>EF = 0.445 x %HAP x 2000</td>
<td>EF = ((1.03646 x %HAP) – 0.195) x 2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>application using</td>
<td></td>
<td>EF = 0.445 x %HAP x 2000 x 0.73</td>
<td>EF = ((1.03646 x %HAP) – 0.195) x 2000 x 0.73</td>
<td></td>
<td></td>
</tr>
<tr>
<td>robotic or automated</td>
<td></td>
<td>EF = 0.185 x %HAP x 2000</td>
<td>EF = ((0.4506 x %HAP) – 0.0505) x 2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>spray</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(^1\)Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

\(^2\)The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the Vapor Suppressant Effectiveness (VSE) test method of Appendix A to Subpart WWWWWW.

\(^3\)Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.
### ATTACHMENT E
#### Tables 3, 4 and 7 to Subpart WWWW of Part 63

**Table 3 to Subpart WWWW of Part 63 — Organic HAP Emissions Limits for Open Molding Sources**

As specified in §63.5805, the permittee shall meet the following organic HAP emissions limits:

<table>
<thead>
<tr>
<th>Operation</th>
<th>Type of Coating Application</th>
<th>Organic HAP emissions limit (lb/ton)&lt;sup&gt;1&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open molding — corrosion-resistant and/or high strength</td>
<td>Mechanical resin application</td>
<td>113</td>
</tr>
<tr>
<td></td>
<td>Filament application</td>
<td>171</td>
</tr>
<tr>
<td></td>
<td>Manual resin application</td>
<td>123</td>
</tr>
<tr>
<td>Open molding — non-(corrosion resistant and/or high strength)</td>
<td>Mechanical resin application</td>
<td>88</td>
</tr>
<tr>
<td></td>
<td>Filament application</td>
<td>188</td>
</tr>
<tr>
<td></td>
<td>Manual resin application</td>
<td>87</td>
</tr>
<tr>
<td>Open molding — low-flame spread/low-smoke products</td>
<td>Mechanical resin application</td>
<td>497</td>
</tr>
<tr>
<td></td>
<td>Filament application</td>
<td>270</td>
</tr>
<tr>
<td></td>
<td>Manual resin application</td>
<td>238</td>
</tr>
<tr>
<td></td>
<td>Tooling gel coating</td>
<td>440</td>
</tr>
<tr>
<td></td>
<td>White/off white pigmented gel coating</td>
<td>267</td>
</tr>
<tr>
<td></td>
<td>All other pigmented gel coating</td>
<td>377</td>
</tr>
<tr>
<td></td>
<td>CR/HS or high performance gel coat</td>
<td>605</td>
</tr>
<tr>
<td></td>
<td>Fire retardant gel coat</td>
<td>854</td>
</tr>
<tr>
<td></td>
<td>Clear production gel coat</td>
<td>522</td>
</tr>
</tbody>
</table>

The permittee must meet the organic HAP emissions limits as summarized above. The full details for the compliance options are found in §63.5810, but are summarized below:

1. **Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 to MACT WWWW.** This option is detailed in §63.5810(a).

2. **Demonstrate that, on average, the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type are met.** The permittee must demonstrate that on average, the individual organic HAP emissions limits are met for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to MACT WWWW that applies to the facility. This option is detailed in §63.5810(b).

3. **Demonstrate compliance with a weighted average emission limit.** The permittee must demonstrate each month that each weighted average of the applicable organic HAP emissions limits in Table 3 to MACT WWWW are met. This option is detailed in §63.5810(c).

4. **Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.** This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling. This option is detailed in §63.5810(d).

<sup>1</sup>The permittee shall be at or below these values based on a 12-month rolling average.

<sup>2</sup>If the permittee only applies gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If the permittee uses multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the permittee may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.
**Table 4 to Subpart WWWW of Part 63 — Work Practice Standards**

As specified in §63.5805, the permittee shall meet the work practice standards in the following table:

<table>
<thead>
<tr>
<th>Operation</th>
<th>Work Practice Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cleaning</td>
<td>The permittee shall not use cleaning solvents that contain HAP, except organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.</td>
</tr>
<tr>
<td>HAP-containing materials storage</td>
<td>The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials.</td>
</tr>
</tbody>
</table>

---

**Table 7 to Subpart WWWW of Part 63 — Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type**

As specified in §63.5810(d), when electing to use the same resin(s) for multiple resin application methods, the permittee may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown in the following table:

<table>
<thead>
<tr>
<th>Resin Type</th>
<th>Application Method</th>
<th>Type of Coating Application</th>
<th>Maximum Allowable Percent Organic HAP Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrosion-Resistant and/or High Strength resins</td>
<td>Nonatomized mechanical Filament application</td>
<td>46.4</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Manual</td>
<td>46.4</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Filament application Manual</td>
<td>42.0</td>
<td></td>
</tr>
<tr>
<td>Non- (Corrosion-Resistant and/or High Strength) resins</td>
<td>Filament application Mechanical</td>
<td>45.0¹</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Manual</td>
<td>45.0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Nonatomized mechanical Manual</td>
<td>38.5</td>
<td></td>
</tr>
</tbody>
</table>

¹Nonatomized mechanical application shall be used.
STATEMENT OF BASIS

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) Part 70 Operating Permit Application, received October 27, 2014;
2) Construction Permit No. 032011-004;
3) Construction Permit No. 062011-012;
4) Construction Permit No. 062011-012A;
5) Construction Permit No. 052012-011;
6) Construction Permit No. 022014-001;
7) Construction Permit No. 022015-003;
8) Construction Permit No. 012015-001;
9) Construction Permit 072016-003
10) 2014 Emissions Inventory Questionnaire, received March 18, 2015; and

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
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.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants does not apply to the installation. 10 CSR 10-6.220(1)(O) exempts emission units that are contained within and emit only within a building space. This does not include emission units with a collection device vented outside the building space.

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions does not apply to the installation. 10 CSR 10-6.260(1)(A) exempts individual units fueled exclusively with liquefied petroleum gas.

10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes is not applicable to the installation. 10 CSR 10-6.400(1)(B)14 exempts coating operations equipped with a control system designed to control at least 95% of particulate overspray provided the system is operated and maintained in accordance with the manufacturer’s specifications or comparable
Redneck Manufacturing LLC Part 70 Operating Permit SB - 2
Installation ID: 011-0042 Project No. 2014-10-058

maintenance procedures that meet or exceed manufacturer’s specifications, 10 CSR 10-6.400(1)(B)6 exempt the burning of fuel for indirect heating, and 10 CSR 10-6.400(1)(B)12 exempts emission units that at maximum design capacity have a PTE of less than 0.5 lb/hr of PM.

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating is not applicable to the installation. 10 CSR 10-6.405(1)(E) exempts installation exclusively fueled by propane.

Construction Permit History
The following is a brief history of construction permits for this installation:

Construction Permit No. 032011-004
Issued on March 4, 2011, the permit was for the installation of a new deer blind production line. There were several special conditions associated with this permit, but they have since been superseded.

Construction Permit No. 062011-012
Issued on June 27, 2011, the permit was for the installation of a new deer blind manufacturing plant. The special conditions limited them on the number of deer blinds they could produce in a day, produce in a week, about of styrene emissions in a 12-month period, and controlled spray procedures. However, the special conditions have since been superseded by another construction permit.

Construction Permit No. 062011-012A
Issued on October 25, 2011, the permit was issued to correct 2 special conditions that contradicted one another. The facility was limited to producing 60 blinds per week, which equals 3,120 blinds per calendar year. The facility was also given a limit of 10.0 tons per year of styrene, based on a twelve-month rolling total. However, based on the styrene limit of 10.0 tons, the facility would only be limited to produce 1,944 blinds per twelve-month rolling total. The weekly limit was removed, but the daily limit was maintained so that the styrene emissions will remain under the Risk Assessment Level (RAL). The special conditions of this permit have since been superseded.

Construction Permit No. 052012-011
Issued on May 16, 2012, the permit was issued to increase the limit of production for the plant. The facility has been limited to producing no more than 24 deer blinds per day. The facility is limited to emitting less than 10.0 tons of styrene combined from the gel coat application (EU-1), chop gun (EU-1), and open seaming (EU-3). The facility is required to use the controlled spray procedures outlined in “CFA Controlled Spray Handbook,” ensure than mold containment flanges are in place during spraying operations in accordance with the handbook, and shall maintain records that the spray gun has been calibrated and that the operators have been trained in the techniques of controlled spraying. Special Condition also restrict operating time of the facility, and provides guidance if the facility decides to use an alternative material or produce a different deer blind in the future. The permit also address if the facility decides to redesign the building configuration and also record keeping requirements. The special conditions of this permit have since been superseded.
Construction Permit No. 022014-001
Issued on February 3, 2014, the permit was issued to eliminate the HAP limits that were included in Permit No. 052012-011. The production process was modified, and a catalysts is now added to the resins and bonding putty used during open seaming (EU-3). The facility also added a 6,016 gallon resin storage tank. The special conditions of this permit have since been superseded.

Construction Permit No. 022015-003
Issued on February 4, 2015, the permit was issued for the addition of a manufacturing line at the existing fiberglass deer blind installation. A new fiberglass manufacturing line was installed at a location on 1101 East 12th Street. The equipment installed includes two gel coating guns (EU1), a closed molding injection process (EU9), a hand-lay application process (open seaming (EU3) and open flooring (EU5)), and sanding tables (EU8). The closed mold injection process is new, while the other equipment is being relocated from the Lane and Gulf Street Locations. The parts produced at the 12th Street location will be sent to the Gulf Street location to be painted.

The facility is limited to producing 24 deer blinds per day and also limited to operating between the hours of 7 a.m. to midnight (12 a.m.). All three locations will be considered the same installation for permitting purposes. If the installation decides to use a different type of material or produce a different type of deer blind, it shall calculate the new VOC and individual HAP emissions to ensure that these emissions are less than the emissions from the current material. The special conditions of this permit have since been superseded.

Construction Permit 012016-001
Issued on January 4, 2016, this permit was for changes in gelcoat, resin, and adhesive usage. The special conditions of this permit have since been superseded.

Construction Permit 072016-003 Issued July 12, 2016:
Issued on July 12, 2016, this permit is for increased gelcoat, resin, and adhesive usage. A planned expansion to a fourth location, 1701 Maple, was also permitted, but never took place.

Special Condition 1 states that the conditions of this permit supersede all special conditions in Construction Permits 032011-004, 062011-012, 062011-012A, 052012-011, 022014-001, 022015-003, and 012016-001.

Special Conditions 2 – 8 have been applied in Permit Condition PW001.

New Source Performance Standards (NSPS) Applicability
40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units is not applicable to the installation. This regulation only applies to steam generating units with a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr per §60.40c(a).

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 is not applicable to the installation. This regulation applies to tanks with a capacity greater than or equal to 75 m³.
Maximum Achievable Control Technology (MACT) Applicability
This permit is written on the basis that the facility is meeting the requirements of Table 3 of MACT WWWW by using the options available in §63.5810, and not the installation of add on controls.

§63.5790 (b) The affected source consists of all parts of your facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts you also manufacture.

§63.5790(c) The following operations are specifically excluded from any requirements in this subpart: application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations; prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.

§63.5935 What definitions apply to this subpart?
- Atomized mechanical application means application of resin or gel coat with spray equipment that separates the liquid into a fine mist. This fine mist may be created by forcing the liquid under high pressure through an elliptical orifice, bombarding a liquid stream with directed air jets, or a combination of these techniques.
- Closed molding means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (e.g., compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.
- Corrosion-resistant resin means a resin that either:
  1.) Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH ≥ 12.0 or ≤ 3.0, oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or
2.) Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

- **HAP-containing materials storage** means an ancillary process which involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.

- **High strength resins** means polyester resins which have a casting tensile strength of 10,000 pounds per square inch or more and which are used for manufacturing products that have high strength requirements such as structural members and utility poles.

- **Injection molding** means a closed molding process for fabricating composites in which composite materials are injected under pressure into a heated mold cavity that represents the exact shape of the product. The composite materials are cured in the heated mold cavity.

- **Pultrusion** means a continuous process for manufacturing composites that have a uniform cross-sectional shape. The process consists of pulling a fiber-reinforcing material through a resin impregnation chamber or bath and through a shaping die, where the resin is subsequently cured. There are several types of pultrusion equipment, such as open bath, resin injection, and direct die injection equipment.

40 CFR Part 63, Subpart HHHHHH, *National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous surface Coating Operations at Area Sources*, does not apply to the installation because the paint used at the facility does not contain target HAPs listed in this subpart and the installation is not an area source for HAP.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**
None.

**Compliance Assurance Monitoring (CAM) Applicability**
40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*
The CAM rule applies to each pollutant specific emission unit that:
- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.
Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)\textsuperscript{1}</th>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)\textsuperscript{1}</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>0.14</td>
<td>Styrene (100-42-5)</td>
<td>63.07</td>
</tr>
<tr>
<td>NO\textsubscript{x}</td>
<td>0.25</td>
<td>Methyl Methacrylate (80-62-6)</td>
<td>6.56</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>3.06</td>
<td>Cobalt Compounds</td>
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<tr>
<td>PM\textsubscript{2.5}</td>
<td>2.79</td>
<td>Toluene (108-88-3)</td>
<td>1.26</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>1.57x10\textsuperscript{-5}</td>
<td>Methanol (67-56-1)</td>
<td>0.02</td>
</tr>
<tr>
<td>VOC</td>
<td>218.61</td>
<td>Xylene (1330-20-7)</td>
<td>1.08</td>
</tr>
<tr>
<td>HAPs</td>
<td>99.69</td>
<td>Cumene (98-82-8)</td>
<td>1.08</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ethylbenzene (100-41-4)</td>
<td>0.16</td>
</tr>
</tbody>
</table>

\textsuperscript{1}Potential emissions taken from Construction Permit 072016-003.

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 APCP'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 APCP a schedule for achieving compliance for that regulation(s).
Response to Public Comments

A draft of the Part 70 Operating Permit for Redneck Manufacturing LLC was placed on public notice on April 7, 2017, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Mark A. Smith of Region VII of the Environmental Protection Agency. The four comments are addressed in the order in which they appear within the letter.

Comment #: 1
First, the Installation Description in Section I and on the draft operating permit cover page, says "the manufacturing process takes place at three separate locations: 1101 East 12th Street, 153 SE 1st Lane and 1705 Gulf Street." However, the Permit to Construct #072016-003 issued to Redneck Manufacturing on July 12, 2016 says "the facility currently operates at four (4) separate locations in Lamar, MO: 153 SE 1st Lane, 1701 Maple Street, 1705 Gulf Street, and 1101 East 12th Street." There does not appear to be any discussion in the Statement of Basis which would explain why the 1701 Maple Street location, identified in the construction permit issued in July 2016, is not included in the draft operating permit, placed on public notice in April 2017. EPA suggests MDNR consider providing clarification, in the Statement of Basis, regarding the absence of the 1701 Maple Street location in the draft operating permit.

Response to Comment:
The expansion of production to 1701 Maple Street, as permitted, never took place. A comment was added to the Statement of Basis.

Comment #: 2
Second, Table 3: Emission Summary (tons per year) in Permit to Construct #072016-003, issued to Redneck Manufacturing on July 12, 2016, shows the existing potential emissions of volatile organic compounds (VOC) to be 196.40; and the potential emissions of VOC of the application to be 218.89. It would appear that the potential to emit (PTE) of VOC before the manufacturing increase authorized in Permit to Construct #072016-003 is 196.40 tons per year (tpy) and the VOC PTE of the authorized increase is 218.89 tpy, therefore, the VOC PTE for the entire installation is 415.29 tpy. A VOC PTE of 415.29 tpy would seem to classify Redneck Manufacturing as a major source of VOC, however, the operating permit indicates the facility is only a major source of hazardous air pollutants (HAPs). EPA suggests MDNR consider an added explanation in the Statement of Basis informing the public as to why Redneck Manufacturing is not a major source of VOC.

Response to Comment:
The oversight was corrected. The description now states the installation is a major source for VOCs and HAPs.

Comment #: 3
Third, Permit Condition PW001 incorporates special conditions from Permit to Construct #072-10-003 issued July 12, 2016 authorizing Redneck Manufacturing to increase gel coat, resin and adhesive usage for an existing deer blind manufacturing installation. There is no reference to the origin of and authority for the emission limitations presented in Table 1 of Permit Condition PW001; so EPA suggests MDNR include the Special Condition 2 reference. Also, the Use of Alternative Material and Coatings or
Production of Different Deer Blinds section of Permit Condition PW001 requires the permittee to calculate PTE of all HAPs and VOCs from the entire installation when considering using an alternative gel coat, resin, adhesive, or manufacturing a different type of deer blind, then those listed in the Application for Authority to Construct for permit #072016-003. The types of gel coats, resins, adhesives and list of currently manufactured deer blinds listed in the Application for Authority to Construct for permit #072016-003 is not readily available for public review and therefore, EPA suggests MDNR consider including the current types of authorized materials and list of deer blinds from the Application for Authority to Construct in the Statement of Basis.

Response to Comment:
The recommended reference to Special Condition 2.A. was added to PW 1. Changes to the types of gel coats, resins, and adhesives occurs frequently (eleven applications in seven years) and requires a new construction permit each time. A list of authorized materials in this operating permit would likely be outdated long before the renewal period. For a current list of authorized materials, the various applications and issued construction permits should be reviewed. These are available to the public on request to the Air Program.

Comment #: 4
Finally, the Emissions and Work Practice Standards section of Permit Condition PW002 requires the permittee to "meet the organic HAP emission limits in Table 3 to MACT WWWW and work practice standards in Table 4 to MACT WWWW that apply, regardless of the quantity of HAP emitted (See Attachment B)." Attachment B is titled "MMA Calculations" and it is unclear how this MMA Calculation attachment assists the permittee in meeting the HAP emission limits and work practice standards of MACT WWWW. Additionally, Attachment D: Equations to Calculate Organic HAP Emission Factors, refers to the "VSE factor" and references "the VSE test method of Appendix B to this subpart." The term "VSE factor" is undefined and the draft operating permit has no Appendix B. Therefore, EPA suggests MDNR consider including a discussion of the process for determining the "VSE factor" in the Statement of Basis. Also, footnote 1 to the table in Attachment E says "the permittee shall be at or below these values based on a 12-month rolling average." However, there is no indication how often the permittee determines the 12-month rolling average. EPA suggests MDNR might consider including a "roll" frequency to footnote 1.

Response to Comment:
The reference to Attachment B was corrected to Attachment E. A definition of “VSE” was added to Attachment D. Twelve-month rolling averages are inherently calculated each month.
Missouri Department of Natural Resources

JUN 02 2017

Mr. Russ Hurt
Redneck Manufacturing LLC
1705 Gulf Street
Lamar, MO 64759

Re: Part 70 Operating Permit
Installation ID: 011-0042, Permit Number: OP2017-044

Dear Mr. Hurt:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:bjj

Enclosures

C: PAMS File: 2014-10-058

Recycled paper