

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 032011-003

Project Number: 2010-02-094

Parent Company: Ritepak, Inc.

Parent Company Address: 902 Lafayette Street, St. Joseph, MO 64503

Installation Name: R & L Industries

Installation Number: 021-0124

Installation Address: 902 Lafayette Street, St. Joseph, MO 64503

Location Information: Buchanan County (S17, T57N, R35W)

Application for Authority to Construct was made for:

The permitting of an insecticide and pesticide mixing and packaging plant that was constructed prior to receipt of a permit from the Air Pollution Control Program. This permit is part of an enforcement remedial action required by the Air Pollution Control Program. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

MAR 14 2011

EFFECTIVE DATE

Handwritten signature of James L. Kavanaugh in black ink.

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

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

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

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

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

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

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SPECIAL CONDITIONS:

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

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

R & L Industries
Buchanan County (S17, T57N, R35W)

1. Emission Limitation – Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)
 - A. R & L Industries shall emit less than 15.0 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12-month period from the entire installation. Table 1 below lists the equipment/activities from the installation.

Table 1: List of PM₁₀ Emission Units/Activities at the Installation

Emission Units	Unit/Activities Description
EU-1	Tank A Loading and Unloading
EU-2	Tank B Loading and Unloading
EU-3	Feed Product Tank
EU-4	Product Line 1 Loading and Unloading
EU-5	Production Line 1 Transfer
EU-6	Production Line 1 Internal Handling
EU-7	Production Line 2 Loading and Unloading
EU-8	Production Line 2 Transfer
EU-9	Production Line 2 Internal Handling
EU-10	Production Line 3 Loading and Unloading
EU-11	Production Line 3 Transfer
EU-12	Production Line 3 Internal Handling
EU-13	Production Line 4 Loading and Unloading
EU-14	Production Line 4 Transfer
EU-15	Production Line 4 Internal Handling
EU-16	Production Line 5 Loading and Unloading
EU-17	Production Line 5 Transfer
EU-18	Production Line 5 Internal Handling
EU-19	Production Line 6 Loading and Unloading
EU-20	Production Line 6 Transfer
EU-21	Production Line 6 Internal Handling
EU-22	Production Line 7 Loading and Unloading

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SPECIAL CONDITIONS:

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

EU-23	Production Line 7 Transfer
EU-24	Production Line 7 Internal Handling
EU-25	Production Line 8 Loading and Unloading
EU-26	Production Line 8 Transfer
EU-27	Production Line 8 Internal Handling

- B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.
2. Control Device Requirement – Baghouses or Cyclones
- A. R & L Industries shall control emissions from the following equipment/activities using either a baghouse or a cyclone.

Table 2: List of Equipment to be Controlled by Baghouses/Cyclones

Emission Units	Unit/Activities Description
EU-6	Production Line 1 Internal Handling
EU-9	Production Line 2 Internal Handling
EU-12	Production Line 3 Internal Handling
EU-15	Production Line 4 Internal Handling
EU-18	Production Line 5 Internal Handling/Mixing
EU-21	Production Line 6 Internal Handling/Mixing
EU-24	Production Line 7 Internal Handling
EU-27	Production Line 8 Internal Handling

- B. The baghouses and cyclones shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them.
- C. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
- D. R & L Industries shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours while the equipment is

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SPECIAL CONDITIONS:

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

in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

- E. R & L Industries shall maintain an operating and maintenance log for the baghouses and cyclones which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
 - 3) The dates when a cyclone is used and the dates when a baghouse is used for each of the equipment in Table 2.

- 3. Processing of Liquid Solutions
 - A. Before processing any new liquid solutions not submitted with the application, R & L Industries shall calculate the potential emissions for Volatile Organic Compounds (VOCs), individual Hazardous Air Pollutants (HAPs) and combined HAPs. Attachment B or other forms approved by the Air Pollution Control Program shall be used for this purpose.

 - B. If the potential emissions of VOCs are greater than or equal to 40.0 tons per year, the potential emissions of combined HAPs are greater than or equal to 25.0 tons per year or the potential emissions of individual HAPs are greater than or equal to its Screening Model Action Level (SMAL) or 10 tons per year (for HAP that does not have a SMAL), R & L Industries shall obtain approval from the Air Pollution Control Program before the use of these solutions. A listing of the SMAL for each HAP is given in Attachment AA. The list is current to the date of permit issuance. For an updated list of the SMAL, please contact the Air Pollution Control Program.

- 4. Record Keeping and Reporting Requirements
 - A. R & L Industries shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all material processed

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

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

Project Number: 2010-02-094
Installation ID Number: 021-0124
Permit Number:

R & L Industries
902 Lafayette Street
St. Joseph, MO 64503

Complete: March 3, 2010

Parent Company:
RitePak, Inc.
902 Lafayette Street
St. Joseph, MO 64503

Buchanan County (S17, T57N, R35W)

REVIEW SUMMARY

- R & L Industries has applied for authority to permit an existing insecticide and pesticide mixing and packaging plant.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Baghouses and cyclones are being used to control the PM_{2.5} and PM₁₀ emissions from some of the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are conditioned below *de minimis* levels.
- This installation is located in Buchanan County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are conditioned below *de minimis* levels.
- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.

- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

RitePak, Inc. owns and operates an insecticide/pesticide mixing and packaging installation in St. Joseph, Missouri. This facility is a minor source for construction permits without limitations. It is not required to apply for an operating permit because its potential emissions of all pollutants are limited to below their respective *de minimis* levels and no federal regulation (i.e. NSPS, MACT or NESHAP) applies to the installation.

PROJECT DESCRIPTION

This facility was constructed prior to receipt of a permit from the Air Pollution Control Program. Obtaining this permit is an enforcement remedial action required by the Air Pollution Control Program. The facility has eight lines of production. The lines do not have a set maximum hourly design rate (MHDR) because each filling machine can be tooled to fill different bag sizes. Lines 1 through 4 and Line 7 are packaging lines. Line 5 mixes the raw material and sends the resulting product to Lines 1 through 4 for packaging. Line 6 is a packaging line with an in-line mixer. Line 8 is a liquid processing line that will be converted into a solids line. Line 7 and 8 both process materials that do not need to be mixed. Currently, all lines use a baghouse to control particulate emissions. A cyclone is kept at the facility as a backup device.

The facility currently has no contract to package liquid insecticides/pesticides. Therefore, potential emissions from liquid processing cannot be calculated. If the facility obtains a contract to process liquid insecticides/pesticides, the facility shall calculate the potential emissions of VOCs, combined HAPs and individual HAP. If the potential emissions of VOCs are greater than or equal to 40.0 tons per year, the combined HAPs emissions are greater than or equal to 25.0 tons per year or if the individual HAP emissions are greater than or equal to their respective SMAL, or 10 tons per year if the HAP does not have a SMAL, the facility shall obtain approval from the Air Pollution Control Program before processing these liquid insecticides/pesticides. A list of SMAL for each HAP is given in Attachment AA, and this list is current to the date of permit issuance. For an updated list of SMAL, please contact the Air Pollution Control Program.

EMISSIONS/CONTROLS EVALUATION

The production lines do not have set maximum hourly design rates (MHDR) because each of the filling machines can be tooled to fit any size package. To calculate potential emissions, the maximum hourly rate for each line was determined by adding a 25% safety margin to the maximum hourly rates from the previous year.

Emissions were calculated assuming that Lines 1, 2, 3 and 5 process powders, that

Lines 4, 6, 7 and 8 process granules and that all of the lines use a cyclone to control particulate emissions. All of the lines currently use baghouses to control emissions while the cyclone is being used as a backup. However, the facility has indicated that it is an operation that may often need to change control device configurations or the type of material being processed. Therefore, potential emissions were calculated assuming that all of the lines use cyclones because cyclones have a lower control efficiency and this would give the worst case emissions. The use of baghouses can be taken into account when calculating actual emissions.

The emission factors used to calculate potential emissions were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition. Emission factors from AP-42, Section 9.9.1, *Grain Elevator and Processes* (May, 2003), were used to estimate emissions from transfer points that process granules. Emission factors for Bentonite transfer from Section 11.23, *Taconite Ore Processing* (February, 1997), were used to calculate emissions from transfer points that process powders. The factors for Bentonite transfer were chosen because the material currently being processed by the plant is a blend of Sulphur and Bentonite clay. All of the the equipment is located in a building so a control efficiency of 3.7% was given for the enclosure. Cyclones are given a control efficiency of 70% for PM₁₀ and 10% for PM_{2.5}. The control devices are given a 90% capture efficiency.

The facility is limited to 15.0 tons per year of PM₁₀ and Attachment A, or other forms approved by the Air Pollution Control Program, should be used to track PM₁₀ emissions for compliance. In Attachment A, a separate emission factor is given for processing granules controlled by a baghouse (0.1742 lbs/ton), processing granules controlled by a cyclone (0.1830 lbs/ton), processing powder controlled by a baghouse (8.1546 lbs/ton) and processing powder controlled by a cyclone (8.8645 lbs/ton). The facility should use the appropriate emission factor for record keeping based on the current control device configuration and processed material. The emission factors for using baghouses were calculated assuming a 99% device control efficiency.

Please be aware that this permit is not written to cover all future changes. It only allows for some operational flexibility in the types of material (i.e. granules or powder) and types of control devices (baghouses or cyclones) being used. If the facility ever modifies its facility in other ways, such as installing additional equipment or changing the configuration of a production line, a permit may be required and the facility should contact the Air Pollution Control Program before making these changes. Table 1 provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions	Potential Emissions of the Application	New Installation Conditioned Potential
PM _{2.5}	10.0	N/D	N/D	114.6	5.9
PM ₁₀	15.0	N/D	N/D	289.7	<15.0
SO _x	40.0	N/D	N/D	N/A	N/A

NOx	40.0	N/D	N/D	N/A	N/A
VOC	40.0	N/D	N/D	¹ 40.0	N/A
CO	100.0	N/D	N/D	N/A	N/A
HAPs	10.0/25.0	N/D	N/D	¹ 10.0/25.0	N/A

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

Note 1: The facility currently does not have a contract to package liquid pesticides/insecticides and the potential emission of VOC and HAPs cannot be calculated. If the facility ever processes material containing VOC and HAPs, it will be required to calculate emissions to ensure that they stay below the *de minimis* level of 40.0 tpy for VOCs, the *de minimis* level of 25.0 tpy for combined HAPs and the Screening Model Action Level (SMAL) for each individual HAPs or the *de minimis* level of 10.0 tpy for each individual HAP (for HAP without SMALs).

PERMIT RULE APPLICABILITY

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

APPLICABLE REQUIREMENTS

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

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required by April 1st, if submitting a hardcopy and by May 1st, if submitting online at www.dnr.mo.gov/moeis/main/login, for the previous years' emissions. Payment is due June 1st.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-2.070

STAFF RECOMMENDATION

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

Chia-Wei Young
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 4, 2010, received February 8, 2010, designating R & L Industries as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey, dated March 15, 2010.

R & L Industries
 Buchanan County (S17, T57N, R35W)
 Project Number: 2010-02-094
 Installation ID Number: 221-0124
 Permit Number: _____

This sheet covers the month of _____ in the year _____

Process Equipment	Material Handled	Control Device	Amount Processed (tons)	Emission Factor (lbs/ton)	¹ Emissions (lbs)	² Emissions (tons)
Bulk Unloading	Granules	None		0.059		
Bulk Unloading	Powders	None		2.72		
Production Line 1	Granules	Baghouse		0.1742		
Production Line 1	Powders	Baghouse		8.1546		
Production Line 1	Granules	Cyclone		0.1830		
Production Line 1	Powders	Cyclone		8.8645		
Production Line 2	Granules	Baghouse		0.1742		
Production Line 2	Powders	Baghouse		8.1546		
Production Line 2	Granules	Cyclone		0.1830		
Production Line 2	Powders	Cyclone		8.8645		
Production Line 3	Granules	Baghouse		0.1742		
Production Line 3	Powders	Baghouse		8.1546		
Production Line 3	Granules	Cyclone		0.1830		
Production Line 3	Powders	Cyclone		8.8645		
Production Line 4	Granules	Baghouse		0.1742		
Production Line 4	Powders	Baghouse		8.1546		
Production Line 4	Granules	Cyclone		0.1830		
Production Line 4	Powders	Cyclone		8.8645		
Production Line 5	Granules	Baghouse		0.1742		
Production Line 5	Powders	Baghouse		8.1546		
Production Line 5	Granules	Cyclone		0.1830		
Production Line 5	Powders	Cyclone		8.8645		
Production Line 6	Granules	Baghouse		0.1742		
Production Line 6	Powders	Baghouse		8.1546		
Production Line 6	Granules	Cyclone		0.1830		
Production Line 6	Powders	Cyclone		8.8645		
Production Line 7	Granules	Baghouse		0.1742		
Production Line 7	Powders	Baghouse		8.1546		
Production Line 7	Granules	Cyclone		0.1830		
Production Line 7	Powders	Cyclone		8.8645		
Production Line 8	Granules	Baghouse		0.1742		
Production Line 8	Powders	Baghouse		8.1546		
Production Line 8	Granules	Cyclone		0.1830		
Production Line 8	Powders	Cyclone		8.8645		
³Total Emissions This Month (tons) =						
⁴Total Emissions from the Previous Eleven Months (tons) =						
⁵Total Emissions of the Current 12-Month Period (tons) =						

Note 1: Emissions (lbs) from each process equipment calculated by multiplying the Amount Processed (tons) by the Emission Factor (lbs/ton)

Note 2: Emissions (tons) from each process equipment calculated by dividing Emissions (lbs) by 2,000

Note 3: Total Emissions from the Current Month calculated by summing the Emissions (tons) from each equipment/process

Note 4: Total Emissions from the Previous Eleven Months (tons) calculated by adding the Attachment A of the previous eleven months.

Note 5: Total Emissions of the Current 12-Month Period (tons) calculated by adding the Total Emissions This Month (tons) and the Total Emissions from the Previous Eleven Months (tons). A total less than **15.0 tons per year** indicates compliance.

Attachment A – Sample Sheet

R & L Industries
 Buchanan County (S17, T57N, R35W)
 Project Number: 2010-02-094
 Installation ID Number: 221-0124
 Permit Number: _____

This sheet covers the month of _____ in the year _____

Process Equipment	Material Handled	Control Device	Amount Processed (tons)	Emission Factor (lbs/ton)	¹ Emissions (lbs)	² Emissions (tons)
Bulk Unloading	Granules	None	665	0.059	39.235	0.0196
Bulk Unloading	Powders	None	52.5	2.72	142.8	0.0714
Production Line 1	Granules	Baghouse	37.5	0.1742	6.5325	0.0033
Production Line 1	Powders	Baghouse	37.5	8.1546	305.7975	0.1529
Production Line 1	Granules	Cyclone	37.5	0.1830	6.8625	0.0034
Production Line 1	Powders	Cyclone	37.5	8.8645	332.41875	0.1662
Production Line 2	Granules	Baghouse	37.5	0.1742	6.5325	0.0033
Production Line 2	Powders	Baghouse	37.5	8.1546	305.7975	0.1529
Production Line 2	Granules	Cyclone	37.5	0.1830	6.8625	0.0034
Production Line 2	Powders	Cyclone	37.5	8.8645	332.41875	0.1662
Production Line 3	Granules	Baghouse	25	0.1742	4.355	0.0022
Production Line 3	Powders	Baghouse	25	8.1546	203.865	0.1019
Production Line 3	Granules	Cyclone	25	0.1830	4.575	0.0023
Production Line 3	Powders	Cyclone	25	8.8645	221.6125	0.1108
Production Line 4	Granules	Baghouse	50	0.1742	8.71	0.0044
Production Line 4	Powders	Baghouse	50	8.1546	407.73	0.2039
Production Line 4	Granules	Cyclone	50	0.1830	9.15	0.0046
Production Line 4	Powders	Cyclone	50	8.8645	443.225	0.2216
Production Line 5	Granules	Baghouse	15	0.1742	2.613	0.0013
Production Line 5	Powders	Baghouse	15	8.1546	122.319	0.0612
Production Line 5	Granules	Cyclone	15	0.1830	2.745	0.0014
Production Line 5	Powders	Cyclone	15	8.8645	132.9675	0.0665
Production Line 6	Granules	Baghouse	125	0.1742	21.775	0.0109
Production Line 6	Powders	Baghouse	125	8.1546	1019.325	0.5097
Production Line 6	Granules	Cyclone	125	0.1830	22.875	0.0114
Production Line 6	Powders	Cyclone	125	8.8645	1108.0625	0.5540
Production Line 7	Granules	Baghouse	375	0.1742	65.325	0.0327
Production Line 7	Powders	Baghouse	100	8.1546	815.46	0.4077
Production Line 7	Granules	Cyclone	375	0.1830	68.625	0.0343
Production Line 7	Powders	Cyclone	100	8.8645	886.45	0.4432
Production Line 8	Granules	Baghouse	375	0.1742	65.325	0.0327
Production Line 8	Powders	Baghouse	100	8.1546	815.46	0.4077
Production Line 8	Granules	Cyclone	375	0.1830	68.625	0.0343
Production Line 8	Powders	Cyclone	100	8.8645	886.45	0.4432
³ Total Emissions This Month (tons) =						4.4464
⁴ Total Emissions from the Previous Eleven Months (tons) =						9.5232
⁵ Total Emissions of the Current 12-Month Period (tons) =						13.97

Note 1: Emissions (lbs) from each process equipment calculated by multiplying the Amount Processed (tons) by the Emission Factor (lbs/ton)
 Note 2: Emissions (tons) from each process equipment calculated by dividing Emissions (lbs) by 2,000
 Note 3: Total Emissions from the Current Month calculated by summing the Emissions (tons) from each equipment/process
 Note 4: Total Emissions from the Previous Eleven Months (tons) calculated by adding the Attachment A of the previous eleven months.
 Note 5: Total Emissions of the Current 12-Month Period (tons) calculated by adding the Total Emissions This Month (tons) and the Total Emissions from the Previous Eleven Months (tons). A total less than **15.0 tons per year** indicates compliance.

Attachment B - Calculation Sheets

Project Number: 2010-02-094
 Installation ID Number: 021-0124
 Permit Number:

VOC Potential Emissions Calculations

Column 1	Column 2	Column 3	Column 4	¹ Column 5
Material Name	Maximum Hourly Design Rate (gal/hr)	Density (lbs/gal)	VOC Content (Weight %)	Potential VOC Emissions (Tons Per Year)
<i>Example Material</i>	5.0	9.72	15%	31.93

Note 1: Potential VOC Emissions calculated from [Column 2] x [Column 3] x [(Column 4)/100] x 8,760/2,000

HAPs Potential Emissions Calculations

Column 1	Column 2	Column 3	Column 4	¹ Column 5
Material Processed	Maximum Hourly Design Rate (lbs/hr)	Type of HAP	HAPs Content (Weight %)	HAP Emissions (tons)
<i>Example Material</i>	align="center">100	Ethyl Benzene	1%	4.38
		Xylene	5%	21.90
		Cumene	5%	21.90
			² Total HAPs =	48.18
			² Total HAPs =	

Note 1: Individual HAP emissions (Column 5) calculated from [Column 2] x [(Column 4)/100] x 8,760/2,000.

Note 2: Total HAPs emissions calculated from the sum of the individual HAP emissions.

Attachment AA
Hazardous Air Pollutant (HAP) Screening Model Action Levels (SMAL)

Chemical	CAS#	SMAL (tons/year)	Synonyms
Acetaldehyde	75-07-0	9	Acetic Aldehyde, Aldehyde, Ethanal, Ethyl Aldehyde
Acetamide	60-35-5	1	Acetic Acid Amide, Ethanamide
Acetonitrile	75-05-8	4	Methyl Cyanide, Ethanenitrile, Cyanomethane
Acetophenone	98-86-2	1	Acetylbenzene, Methyl Phenyl Ketone, Hypnone
Acetylaminofluorene, [2-]	53-96-3	0.005	N-2-Fluorenyl Acetaminde, N-Fluroen-2-yl Acetamide, 2-Acetamideofluorene
Acrolein	107-02-8	0.04	Acrylaldehyde, Acrylic Aldehyde, Allyl Aldehyde, Propenal
Acrylamide	79-06-1	0.02	Propenamamide, Acrylic Amide, Acrylamide Monomer, Ethylenecarboxamide
Acrylic Acid	79-10-7	0.6	Propenoic Acid, Ethylene Carboxylic Acid, Vinylformic Acid
Acrylonitrile	107-13-1	0.3	Vinyl Cyanide, Cyanoethylene, Propenenitrile
Allyl Chloride	107-05-1	1	1-Chloro-2-Propene, 3-Chloropropylene, Chloroallylene, Alpha-Propylene
Aminobiphenyl, [4-]	92-67-1	1	Biphenylene, P -Phenylaniline, Xenylamine, 4-Aminodiphenyl, 4-Biphenylamine
Aniline	62-53-3	1	Aminobenzene, Phenylamine, Aniline Oil, Aminophen, Arylamine
Anisidine, [Ortho-]	90-04-0	1	O-Methoxyaniline
Antimony Compounds (except those specifically listed)		5	Antimony (Pentachloride, Tribromide, Trichloride, Trifluoride)
Antimony Pentafluoride	7783-70-2	0.1	
Antimony Potassium Tartrate	28300-74-5	1	
Antimony Trioxide	1309-64-4	1	
Antimony Trisulfide	1345-04-6	0.1	
Arsenic and Inorganic Arsenic Compounds		0.005	Arsenic (Diethyl, Disulfide, Pentoxide, Trichloride, Trioxide, Trisulfide), Arsinine, Arsenous Oxide
Benz(a)Anthracene	56-55-3	0.01	
Benz(c)acridine	225-51-4	0.01	
Benzene	71-43-2	2	Benzol, Phenyl Hydride, Coal Naphtha, Phene, Benxole, Cyclohexatriene
Benzidine	92-87-5	0.0003	4,4'-Biphenyldiamine, P-Diaminodiphenyl, 4,4'-Diaminobiphenyl, Benzidine Base
Benzo(a)pyrene	50-32-8	0.01	
Benzo(b)fluoranthene	205-992	0.01	
Benzotrichloride	98-07-7	0.006	Benzoic Trichloride, PhenylChloroform, Trichloromethylbenzene
Benzyl Chloride	100-44-7	0.1	Alpha-Chlorotoluene, Toly Chloride
Beryllium Compounds (except Beryllium Salts)		0.008	Beryllium (Acetate, Carbonate, Chloride, Fluoride, Hydroxide, Nitrate, Oxide)

Beryllium Salts		0.00002	
Biphenyl*	92-52-4	10	
Bis(Chloroethyl)Ether	111-44-4	0.06	Dichloroethyl ether, Dichloroether, Dichloroethyl Oxide, BCEE
Bis(Chloromethyl)Ether	542-88-1	0.0003	BCME, Sym-Dichloromethyl ether, Dichloromethyl Ether, Oxybis-(Chloromethane)
Bromoform*	75-25-2	10	Tribromomethane
Butadiene, [1,3-]	106-99-0	0.07	Biethylene, Biviny, Butadiene Monomer, Divinyl Erythrene, Vinylethylene
Butylene Oxide, [1,2-]	106-88-7	1	1,2-Epoxybutane, 1-Butene Oxide, 1,2-Butene Oxide, Butylene Oxide, Ethylethylene
Cadmium Compounds		0.01	Cadmium (Dust, Fume, Acetate, Chlorate, Chloride, Fluoride, Oxide, Sulfate, Sulfide)
Calcium Cyanamide*	156-62-7	10	
Caprolactam*	105-60-2	10	
Captan*	133-06-2	10	
Carbaryl*	63-25-2	10	
Carbon Disulfide	75-15-0	1	Carbon Bisulfide, Dithiocarbonic Anhydride
Carbon Tetrachloride	56-23-5	1	Tetrachloromethane, Perchloromethane
Carbonyl Sulfide	463-58-1	5	Carbon Oxide Sulfide, Carbonoxysulfide
Catechol	120-80-9	5	Pyrocatechol, O-Dihydroxybenzene
Chloramben	133-90-4	1	3-Amino-2,5-Dichlorobenzoic Acid, Amben, Amiben*, Vegiben* (*Trademark)
Chlordane	57-74-9	0.01	ENT9932, Octachlor
Chlorine	7782-50-5	0.1	Bertholite
Chloroacetic Acid	79-11-8	0.1	Monochloroacetic Acid, Chloroethanoic Acid
Chlorobenzene	108-90-7	10	
Chloroacetophenone, [2-]	532-27-4	0.06	Phenacyl Chloride, Chloromethyl Phenyl Ketone, Tear Gas, Mace
Chlorobenzilate	510-15-6	0.4	Ethyl-4,4'-Dichlorobenzilate, Ethyl-4,4'-Dichlorophenyl Glycollate
Chloroform	67-66-3	0.9	Trichloromethane
Chloromethyl Methyl Ether	107-30-2	0.1	CMME, Methyl Chloromethyl Ether, Chloromethoxymethane, Monochloromethyl Ether
Chloroprene	126-99-8	1	2-Chloro-1,3-Butadiene, Chlorobutadiene, Neoprene Rubber Compound
Chromic Chloride	10025-73-7	0.1	
Chromium Compounds (except Hexavalent)		5	Chromium, Chromium(II) Compounds, Chromium (III) Compounds
Chromium Compounds, Hexavalent		0.002	Chromium (VI)
Chrysene	218-01-9	0.01	
Cobalt Carbonyl	12010-68-1	0.1	
Cobalt Metal (and compounds, except those specifically listed)		0.1	Cobalt (Bromide, Chloride, Diacetate, Formate, Nitrate, Oxide, Sulfamate)
Coke Oven Emissions	8007-45-2	0.03	Coal Tar, Coal Tar Pitch, Coal Tar Distillate
Cresol, [Meta-]	108-39-4	1	3-Cresol, M-Cresylic Acid, 1-Hydroxy-3-Methylbenzene, M-Hydroxytoluene
Cresol, [Ortho-]	95-48-7	1	2-Cresol, O-Cresylic Acid, 1-Hydroxy-2-Methylbenzene, 2-Methylphenol
Cresol, [Para-]	106-44-5	1	4-Cresol, P-Cresylic Acid, 1-Hydroxy-4-Methylbenzene, 4-Hydroxytoluene

Cresols/ Cresylic Acid (isomers and mixture)	1319-77-3	1	
Cumene	98-82-8	10	
Cyanide Compounds (except those specifically listed) ¹	20-09-7	5	Cyanide (Barium, Chlorine, Free, Hydrogen, Potassium, Silver, Sodium, Zinc)
DDE (p,p'-Dichlorodiphenyl Dichloroethylene)	72-55-9	0.01	
Di(2-Ethylhexyl)Phthalate, (DEHP)	117-81-7	5	Bis(2-ethylhexyl)Phthalate, Di(2-Ethylhexyl)Phthalate, DOP, Di-Sec-Octyl Phthalate
Diaminotoluene, [2,4-]	95-80-7	0.02	2,4-Toluene Diamine, 3-Amino-Para-Toluidine, 5-Amino-Ortho-Toluidine
Diazomethane	334-88-3	1	Azimethylene, Diazirine
Dibenz(a,h)anthracene	53-70-3		
Dibenzofuran	132-64-9	5	Diphenylene Oxide
Dibenzopyrene, [1,2:7,8]	189-55-9		
Dibutylphthalate*	84-74-2	10	
Dibromo-3-Chloropropane, [1,2-]	96-12-8	0.01	DBCP
Dibromomethane, [1,2-]	106-93-4	0.1	Ethylene Dibromide, Ethylene Bromide, Sym-Dibromoethane
Dichlorobenzene, [1,4-]	106-46-7	3	1,4-Dichloro-P-DCB, 1-4-DCB, PDB, PDCB
Dichlorobenzidene, [3,3-]	91-94-1	0.2	4,4'-Diamino-3,3'-Dichlorobiphenyl, 3,3'-Dichlorobiphenyl-4,4'-Diamine, DCB
Dichloroethane, [1,1-]	75-34-3	1	Ethylidene Dichloride, 1,1-Ethylidene Dichloride, Asymmetrical Dichlorethane
Dichloroethane, [1,2-]	107-06-2	0.8	Ethylene Dichloride, Glycol Dichloride, Ethylene Chloride
Dichloroethylene, [1,1-]	75-35-4	0.4	Vinylidene Chloride, DCE, VDC
Dichlorophenoxyacetic acid, [2,4], salt and esters*	94-75-7	10	
Dichloropropane, [1,2-]	78-87-5	1	Propylene Dichloride
Dichloropropene [1,3-]	542-75-6	1	1,3-Dichloropropylene, Alpha-Chlorallyl Chloride
Dichlorvos	62-73-7	0.2	DDVP, 2,2-Dichlorovinyl dimethylphosphate
Diethanolamine	11-42-2	5	Bis(2-Hydroxyethyl)Amine, 2,2'-Dihydroxydiethylamine, Di(2-Hydroxyethyl)Amine
Diethyl Sulfate	64-67-5	1	Diethyl Ester Sulfuric Acid, Ethyl Sulfate
Dimethoxybenzidine, [3,3-]	119-90-4	0.1	Fast Blue B Base, Dianisidine, O-Dianisidine
Dimethylbenz(a)anthracene, [7,12]	57-97-6	0.01	
Dimethyl Benzidine, [3,3-]	119-93-7	0.008	O-Tolidine, Bianisidine, 4,4'-Diamino-3,3'-Dimethylbiphenyl, Diaminoditoyl
Dimethyl Carbamoyl Chloride	79-44-7	0.02	DMCC, Chloroformic Acid Dimethyl Amide, Dimethyl Carbamyl Chloride
Dimethyl Formamide	68-12-2	1	DMF, Formyldimethylamine
Dimethyl Hydrazine, [1,1-]	57-14-7	0.008	Unsymmetrical Dimethylhydrazine, UDMH, Dimazine
Dimethyl Phthalate*	131-11-3	10	
Dimethyl Sulfate	77-78-1	0.1	Sulfuric Acid Dimethyl Ester, Methyl Sulfate
Dimethylaminoazobenzene, [4-]	60-11-7	1	N,N-Dimethyl-P-Phenylazo-Aniline, Benzeneazo Dimethylaniline

Dimethylaniline, [N,N-]	121-69-7	1	N,N-Diethyl Aniline, N,N-Dimethylphenylamine, DMA
Dinitro-O-Cresol, [4,6-] and salts	534-52-1	0.1	DNOC, 3,5-Dinitro-O-Cresol, 2-Methyl-4,6-Dinitrophenol
Dinitrophenol, [2,4-]	51-28-5	1	DNP
Dinitrotoluene, [2,4-]	121-14-2	0.02	Dinitrotoluol, DNT, 1-Methyl-2,4-Dinitrobenzene
Dioxane, [1,4-]	123-91-1	6	1,4-Diethyleneoxide, Diethylene Ether, P-Dioxane
Diphenylhydrazine, [1,2-]	122-66-7	0.09	Hydrazobenzene, N,N'-Diphenylhydrazine, N,N'-Bianiline, 1,1'-Hydrodibenzene
Diphenylmethane Diisocyanate, [4,4-]	101-68-8	0.1	Methylene Bis(Phenylisocyanate), Methylene Diphenyl Diisocyanate, MDI
Epichlorohydrin	106-89-8	2	1-Chloro-2,3-Epoxypropane, EPI, Chloropropylene Oxide, Chloromethyloxirane
Ethoxy Ethanol [2-]*	110-80-5	10	
Ethyl Acrylate	140-88-5	1	Ethyl Propenoate, Acrylic Acid Ethyl Ester
Ethyl Benzene*	100-41-4	10	
Ethyl Chloride*	75-00-3	10	
Ethylene Glycol*	107-21-1	10	
Ethylene Imine (Aziridine)	151-56-4	0.003	Azacyclopropane, Dimethyleneimine, Ethylenimine, Vinylamine, Azirane
Ethylene Oxide	75-21-8	0.1	1,2-Epoxyethane, Oxirane, Dimethylene Oxide, Anprolene
Ethylene Thiourea	96-45-7	0.6	2-Imidazolidinethione, ETU
Fluomine	62207-76-5	0.1	
Formaldehyde	50-00-0	2	Oxymethylene, Formic Aldehyde, Methanal, Methylene Oxide, Oxomethane
Glycol Ethers (except those specifically listed) ²		5	
Heptachlor	76-44-8	0.02	1,4,5,6,7,8,8A-Heptachloro-3A,4,7,7A-Tetrahydro-4,7-Methanoindiene
Hexachlorobenzene	118-74-1	0.01	Perchlorobenzene, HCB, Pentachlorophenyl Benzene, Phenyl Perchloryl
Hexachlorobutadiene	87-68-3	0.9	Perchlorobutadiene, 1,3-Hexachlorobutadiene, HCB
Hexachlorocyclopentadiene	77-47-4	0.1	HCCPD, HEX
Hexachloroethane	67-72-1	5	Perchloroethane, Carbon Hexachloride, HCE, 1,1,1,2,2,2-Hexachloroethane
Hexamethylene Diisocyanate, 1,6-	822-06-0	0.02	1,6-Diisocyanatohexane, 1,6-Hexanediol Diisocyanate
Hexamethylphosphoramide	680-31-9	0.01	Hexamethylphosphoric Triamide, HEMPA, Hexametapol, Hexamethylphosphoramide
Hydrazine	302-01-2	0.004	Methylhydrazine, Diamide, Diamine, Hydrazine Base
Hydrochloric Acid*	7647-01-0	10	
Hydrogen Fluoride	7664-39-3	0.1	Hydrofluoric Acid Gas, Fluorhydric Acid Gas, Anhydrous Hydrofluoric Acid
Hydrogen Selenide	7783-07-5	0.1	
Hydroquinone	123-31-9	1	Quinol, Hydroquinol, P-Diphenol, 1,4-Benzenediol, Hydrochinone, Arctivin
Indeno(1,2,3-cd)Pyrene	193-39-5	0.01	
Isophorone*	78-59-1	10	
Lead and Compounds (except those specifically listed)	20-11-1	0.01	Lead (Acetate, Arsenate, Chloride, Fluoride, Iodide, Nitrate, Sulfate, Sulfide)
Lindane [Gamma-	58-89-9	0.01	Benzene Hexachloride – Gamma Isomer

Hexachlorocyclohexane]			
Maleic Anhydride	108-31-6	1	2,5-Furandiene, Cis-Butenedioic Anhydride, Toxilic Anhydride
Manganese and Compounds (except those specifically listed)	20-12-2	0.8	Manganese (Acetate, Chloride, Dioxide, (II)-Oxide, (III)-Oxide, (II)-Sulfate)
Mercury Compounds (except those specifically listed)	20-13-3	0.01	Mercury Compounds (Methyl-, Ethyl-, Phenyl-)
Mercury Compounds (Inorganic)	20-13-3	0.01	Mercury (Chloride, Cyanide, (I,II)-[Bromide, Iodide, Nitrate, Sulfate], Oxide)
Methanol*	67-56-1	10	
Methoxychlor*	72-43-5	10	
Methoxy Ethanol, [2-]*	108-86-4	10	
Methyl Bromide*	74-83-9	10	Bromomethane
Methyl Chloride*	74-87-3	10	Chloromethane
Methyl Chloroform*	71-55-6	10	1,1,1,-Trichloroethane
Methyl Hydrazine	60-34-4	0.06	Monomethylhydrazine, Hydrozomethane, 1-Methylhydrazine
Methyl Iodide	74-88-4	1	Idomethane
Methyl Isobutyl Ketone*	108-10-1	10	
Methyl Isocyanate	624-83-9	0.1	Isocyanatomethane, Isocyanic Acid, Methyl Ester
Methyl Methacrylate*	80-62-6	10	
Methyl Tert-Butyl Ether*	12108-13-3	10	
Methylcyclopentadienyl Manganese	12108-13-3	0.1	
Methylene Bis(2-Chloroaniline), [4,4-]	101-14-4	0.2	Curene, MOCA, 4,4'-Diamino-3,3'-Dichlorodiphenylmethane
Methylene Chloride*	75-09-2	10	Dichloromethane
Methylenedianiline, [4,4-]	101-77-9	1	4,4'-Diaminodipheylmethane, DDM, MDA, Bis(4-Aminophenyl)Methane, DAPM
Naphthalene*	91-20-3	10	
Nickel Carbonyl	13463-39-3	0.1	
Nickel Compounds (except those specifically listed)		1	Nickel (Acetate, Ammonium Sulfate, Chloride, Hydroxide, Nitrate, Oxide, Sulfate)
Nickel Refinery Dust	12035-72-2	0.08	
Nickel Subsulfide		0.04	
Nitrobenzene	98-95-3	1	Nitrobenzoi, Oil of Mirbane, Oil of Bitter Almonds
Nitrobiphenyl, [4-]	92-93-3	1	4-Nitrodiphenyl, P-Nitrobiphenyl, P-Nitrophenyl, PNB
Nitrophenol, [4-]	100-02-7	5	4-Hydroxynitrobenzene, Para-Nitrophenol
Nitropropane, [2-]	79-46-9	1	Dimethylnitromethane, Sec-Nitropropane, Isonitropropane, Nitroisopropane
Nitroso-N-Methylurea, [N-]	684-93-5	0.0002	N-Methyl-N-Nitrosourea, N-Nitroso-N-Methylcarbamide
Nitrosodimethylamine, [N-]	62-75-9	0.001	Dimethylnitrosamine, DMN, DMNA
Nitrosomorpholine, [N-]	59-89-2	1	4-Nitrosomorpholine
Parathion	56-38-2	0.1	DNTP, Monothiophosphate, Diethyl-P-Nitrophenyl

PCB (Polychlorinated Biphenyls)	1336-36-3	0.009	Aroclors
Pentachloronitrobenzene	82-68-8	0.3	Quintobenzene, PCNB, Quiniozene
Pentachlorophenol	87-86-5	0.7	PCP, Penchlorol, Pentachlorophenate, 2,3,4,5,6-Pentachlorophenol
Phenol	108-95-2	0.1	Carbolic Acid, Phenic Acid, Phenylic Acid, Phenyl Hydrate, Hydroxybenzene
Phenyl Mercuric Acetate	62-38-4	0.01	
Phenylenediamine, [p-]*	106-50-3	10	
Phosgene	75-44-5	0.1	Carbonyl Chloride, Carbon Oxychloride, Carbonic Acid Dichloride
Phosphine	7803-51-2	5	Hydrogen Phosphide, Phosphoretted Hydrogen, Phosphorus Trihydride
Phosphorous (Yellow or White)	7723-14-0	0.1	
Phthalic Anhydride	85-44-9	5	Phthalic Acid Anhydride, Benzene-O-Dicarboxylic Acid Anhydride, Phthalandione
Polycyclic Organic Matter (except those specifically listed)	TP15	0.01	POM, PAH, Polyaromatic Hydrocarbons,
Potassium Cyanide	151508	0.1	
Propane Sultone, [1,3-]	1120-71-4	0.03	1,2-Oxathiolane-2,2-Dioxide, 3-Hydroxy-1-Propanesulphonic Acid Sultone
Propiolactone, [Beta-]	57-57-8	0.1	2-Oxeatanone, Propiolactone, BPL, 3-Hydroxy-B-Lactone-Propanoic Acid
Propionaldehyde	123-38-6	5	Propanal, Propyl Aldehyde, Propionic Aldehyde
Propoxur*	114-26-1	10	Baygone
Propylene Oxide	75-56-9	5	1,2-Epoxypropane, Methylethylene Oxide, Methyl Oxirane, Propene Oxide
Propyleneimine, [1,2-]	75-55-8	0.003	2-Methyl Aziridine, 2-Methylazacyclopropane, Methylethyleneimine
Quinoline	91-22-5	0.006	1-Azanaphthalene, 1-Benzazine, Benzo(B)Pyridine, Chinoleine, Leucoline
Quinone	016-51-4	5	Benzoquinone, Chinone, P-Benzoquinone, 1,4-Benzoquinone
Selenium and Compounds (except those specifically listed)	7782-49-2	0.1	Selenium (Metal, Dioxide, Disulfide, Hexafluoride, Monosulfide)
Sodium Cyanide	143339	0.1	
Sodium Selenate	13410010	0.1	
Sodium Selenite	101020188	0.1	
Styrene	100-42-5	1	Cinnamene, Cinnamol, Phenethylene, Phenylethylene, Vinylbenzene
Styrene Oxide	96-09-3	1	Epoxyethylbenzene, Phenylethylene Oxide, Phenyl Oxirane, Epoxystyrene
Tetrachlorodibenzo-P-Dioxin	1746-01-6	6.00E-07	
Tetrachloroethane, [1,1,2,2-]	79-34-5	0.3	Sym-Tetachloroethane, Acetylene Tetrachloride, Ethane Tetrachloride
Tetrachloroethylene*	127-18-4	10	Perchloroethylene
Tetraethyl Lead	78-00-2	0.01	
Tetramethyl Lead	75-74-1	0.01	
Titanium Tetrachloride	7550-45-0	0.1	Titanium Chloride
Toluene*	108-88-3	10	
Toluene Diisocyanate, [2,4-]	584-84-9	0.1	TDI, Tolyene Diisocyanate, Diisocyanatoluene
Toluidine, [Ortho-]	95-53-4	4	Ortho-Aminotoluene, Ortho-Methylaniline, 1-Methyl-1,2-Aminobenzene
Toxaphene	8001-35-2	0.01	Chlorinated Camphene, Camphechlor, Polychlorcamphene
Trichlorobenzene*	120-82-1	10	

Trichloroethane, [1,1,2-]	79-00-5	1	Vinyl Trichloride, Beta-Trichloroethane
Trichloroethylene*	79-01-6	10	
Triethylamine*	121-44-8	10	
Trichlorophenol, [2,4,5-]	95-95-4	1	2,4,5-TCP
Trichlorophenol, [2,4,6-]	88-06-2	6	2,4,6-TCP
Trifluralin	1582-09-8	9	2,6-Dinitro-N-N-Dipropyl-4-(Trifluoromethyl)Benzeneamine
Trimethylpentane, [2,2,4-]	540-84-1	5	Isobutyltrimethylethane, Isoctane
Urethane [Ethyl Carbamate]	51-79-6	0.8	Ethyl Urethane, O-Ethylurethane, Leucothane, NSC 746, Urethan
Vinyl Acetate	108-05-4	1	Acetic Acid Vinyl Ester, Vinyl Acetate Monomer, Ethenyl Ethanoate
Vinyl Bromide	593-60-2	0.6	Bromoethylene, Bromoethene
Xylenes (isomers and mixtures)*	1330-20-7	10	
Xylene, m-*	108-38-3	10	
Xylene, o-*	95-47-6	10	
Xylene, p-*	106-42-3	10	

*X'CN where X'H' or any other group where a formal dissociation may occur, for example, KCN or Ca(CN)₂

²Includes mono- and diethers of ethylene glycol, diethylene glycol and triethylene glycol R-(OCH₂CH₂)_n-OR' where n = 1, 2, or; R=Alkyl or oryl groups; R' R, H or groups which, when removed, yield glycol ethers with the structure R-(OCH₂CH₂)_n-OH. Polymers and ethylene glycol monobutyl ether are excluded from the glycol category.

Mr. Fred Schneider
R & L Industries
902 Lafayette Street
St. Joseph, MO 64503

RE: New Source Review Permit - Project Number: 2010-02-094

Dear Mr. Schneider:

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:cwyl

Enclosures

c: Kansas City Regional Office
PAMS File: 2010-02-094

Permit Number: