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: 1 0 2 0 0 7 - 0 1 2  Project Number: 2006-02-027
Parent Company: ROM Corporation
Parent Company Address: 6800 E. 163rd Street
Installation Name: ROM Corporation
Installation Address: 6800 E. 163rd Street
Location Information: Cass County, T469, R33W

Application for Authority to Construct was made for:
Expansion of the spray painting area and the addition of a pre-treat system. 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.

OCT 2 3 2007
EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES
STANDARD CONDITIONS:

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

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

You must notify the department’s Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 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.
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: Project Number: 2006-02-027

Parent Company: ROM Corporation

Parent Company Address: 6800 E. 163rd Street

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Location Information: Cass County, T469, R33W

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

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

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES
STANDARD CONDITIONS:

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

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

You must notify the department’s Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 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.

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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.
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.”

ROM Corporation
Cass County, T46N, R33W

1. Superseding Condition
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 032004-011) from the Air Pollution Control Program.

2. Emission Limitation
A. ROM Corporation shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from installation in any consecutive 12-month period.

B. Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A), 1(B), and 1(C). ROM Corporation 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 materials used.

C. ROM Corporation shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(C) indicate that the source exceeds the limitation of Special Conditions Number 1(A) and 1(B).

3. Control Device – Paper Filter
Paper filters must be in use at all times when metal finishing paint booth (EP02) is in operation. The paper filters shall be operated and maintained in accordance with the manufacturer’s specifications.

4. Operational Requirements
ROM Corporation shall keep the paint solvents and cleaning solutions in sealed containers whenever the materials are not in use. ROM Corporation shall
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

provide and maintain suitable easily read permanent markings on all paint solvent and cleaning solution containers used with this equipment.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW
Project Number: 2006-02-027
Installation ID Number: 037-0061
Permit Number:

ROM Corporation
6800 E. 163rd Street
Belton, MO 64012

Parent Company:
ROM Corporation
6800 E. 163rd Street
Belton, MO 64012

Cass County, T46N, R33W

REVIEW SUMMARY

• ROM Corporation has applied for authority to expand the existing spray painting area and add a pre-treat system.

• Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are xylene.

• None of the New Source Performance Standards (NSPS) apply to the proposed equipment.

• Paper filters are being used to control the PM$_{10}$ emissions from 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 HAPs are below de minimis levels.

• This installation is located in Cass County, a maintenance area for ozone (O$_3$) and an attainment area for all other criteria air pollutants.

• This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

• Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

• Emissions testing is not required for the source.

• A Basic Operating Permit application is required for this installation within 30 days of
equipment startup.

- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

ROM Corporation owns and operates a bulkhead manufacturing plant in Belton, Missouri. The bulkheads produced are used in the food distribution, fire service, and build security industries.

The following permits have been issued to ROM Corporation from the Air Pollution Control Program.

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>112003-006</td>
<td>Metal finishing</td>
</tr>
<tr>
<td>032004-011</td>
<td>Spray Painting</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

ROM Corporation has applied for authority to expand their existing spray booth to allow for more room to paint and cure doors. The spray equipment used for paint application will not be modified. Expanding the spray booth will increase production by reducing the amount of rework do to cross contamination. In addition to expanding the existing paint booth ROM Corporation will install a pre-treat system. The applicant submitted a maximum application rate of 0.34 gallons per hour. This rate is based on maximum historical usage and hours of operation.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, section 1.5 Liquefied Petroleum Gas Combustion, October 1996. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.
Table 1: Emissions Summary (tons per year)

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>15.0</td>
<td>1.8</td>
<td>N/D</td>
<td>0.05</td>
<td>N/A</td>
</tr>
<tr>
<td>SO$_X$</td>
<td>40.0</td>
<td>N/A</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NO$_X$</td>
<td>40.0</td>
<td>N/A</td>
<td>N/D</td>
<td>0.62</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>39.4</td>
<td>16.97</td>
<td>7.66</td>
<td>N/A</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>N/A</td>
<td>N/D</td>
<td>0.52</td>
<td>N/A</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>25.0</td>
<td>35.7**</td>
<td>N/D</td>
<td>6.51</td>
<td>&lt; 25</td>
</tr>
<tr>
<td>Ethyl Benzene</td>
<td>10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>0.71</td>
<td>&lt; 10</td>
</tr>
<tr>
<td>Styrene</td>
<td>10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>0.14</td>
<td>&lt; 10</td>
</tr>
<tr>
<td>Methyl Isobutyl</td>
<td>10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>0.71</td>
<td>&lt; 10</td>
</tr>
<tr>
<td>Toluene</td>
<td>10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>0.71</td>
<td>&lt; 10</td>
</tr>
<tr>
<td>Xylene</td>
<td>10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>4.24</td>
<td>&lt; 10</td>
</tr>
</tbody>
</table>

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

**Combined HAPs were limited to less the 25 tons under permit 032004-011

PERMIT RULE APPLICABILITY

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

APPLICABLE REQUIREMENTS

ROM Corporation 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

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 April 1 for the previous year's emissions.

- **Operating Permits, 10 CSR 10-6.065**

- **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 10-3.090

SPECIFIC REQUIREMENTS

- Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400
- Control of Emissions from Industrial Surface Coating Operations, 10 CSR 10-2.230

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.

Michael Mittermeyer       Date
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 1/26/2006, received 2/07/2006, designating ROM Corporation as the owner and operator of the installation.
Attachment A: Monthly Combined HAPs Tracking Record

ROM Corporation
Cass County, T46N, R33W
Project Number: 2003-11-017
Installation ID Number: 037-0061
Permit Number:

This sheet covers the month of ____________ in the year ____________.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used, (Name, HAP CAS #)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>HAP Content (Weight %)</td>
<td>HAP Emissions (Tons)</td>
</tr>
<tr>
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</tbody>
</table>

(b) Total HAP Emissions Calculated for this Month in Tons:

(c) 12-Month HAP Emissions Total from Previous Month's Attachment A in Tons:

(d) Monthly HAP Emissions Total (b) from Previous Year's Attachment A in Tons:

(e) Current 12-month Total of HAP Emissions in Tons: \[(b) + (c) - (d)\]

INSTRUCTIONS: Choose appropriate HAP calculation method for units reported:

(a) 1) If usage is in tons - \([\text{Column 2}] \times [\text{Column 4}] = [\text{Column 5}]\);
    2) If usage is in pounds - \([\text{Column 2}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}]\);
    3) If usage is in gallons - \([\text{Column 2}] \times [\text{Column 3}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}]\);
(b) Summation of [Column 5] in Tons;
(c) 12-Month HAP emissions (e) from last month's Attachment A in Tons;
(d) Monthly HAP emissions total (b) from the previous year's Attachment A in Tons;
(e) Calculate the new 12-month combined HAPs emissions total. A 12-Month HAP emissions total (e) of less than 25 tons indicates compliance.
## Attachment B: Monthly Individual HAPs Tracking Record

ROM Corporation  
Cass County, T46N, R33W  
Project Number: 2003-11-017  
Installation ID Number: 037-0061  
Permit Number: 

HAP Name: ___________________________ CAS No.: __________________

This sheet covers the month of ___________________ in the year ___________________.

<table>
<thead>
<tr>
<th>Column 1 (a)</th>
<th>Column 2 (b)</th>
</tr>
</thead>
<tbody>
<tr>
<td>List materials from Attachment A which emit this specific HAP (Name, Type)</td>
<td>HAP emissions from Attachment A [Column 5] (in Tons)</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
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</tr>
</tbody>
</table>

(c) Total HAP Emissions Calculated for this Month, in Tons:

(d) 12-Month HAP Emissions Total (f) from Previous Month’s Attachment B, in Tons:

(e) Monthly HAP Emissions Total (c) from Previous Year’s Attachment B, in Tons:

(f) Current 12-month Total of HAP Emissions in Tons: [(c) + (d) - (e)]

**INSTRUCTIONS:**
(a) Individually list each material which emits this specific HAP from this installation;
(b) Record the amount of HAP emissions already calculated for Attachment A in [Column 5] in Tons;
(c) Summation of [Column 2] in Tons;
(d) Record the previous 12-Month individual HAP emission total (f) from last month’s Attachment B, in Tons;
(e) Record the monthly HAP emission total (c) from previous year’s Worksheet B, in Tons;
(f) Calculate the new 12-month individual HAP emissions total. **A 12-Month individual HAP emissions total of**
less than ten tons indicates compliance.
Mr. Tom Paget  
Plant Manager  
ROM Corporation  
6800 E. 163rd Street  
Belton, MO 64012  

RE: New Source Review Permit - Project Number: 2006-02-027  

Dear Mr. Paget:  

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, your new source review permit application and with your amended operating permit 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 me at the department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817. Thank you for attention to this matter.  

Sincerely,  

AIR POLLUTION CONTROL PROGRAM  

Kendall B. Hale  
New Source Review Unit Chief  

KBH:mml  

Enclosures  

c: Kansas City Regional Office  
PAMS File 2006-02-027  
   Permit Number: