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.

Accepting Authority / Date

Permit Number: 042017-007
Project Number: 2017-01-042
Installation Number: 037-0061

Parent Company: Safe Fleet
Parent Company Address: 6800 East 163rd Street, Belton, MO 64012

Installation Name: ROM Corporation
Installation Address: 6800 East 163rd Street, Belton, MO 64012
Location Information: Cass County (S12, T46N, R33W)

Application for Authority to Construct was made for:
The installation of two automated paint machines and a curing oven. 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.

Prepared by
Ryan Schott
New Source Review Unit

Director or Designee
Department of Natural Resources

APR 17 2017
Effective Date
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 Enforcement and Compliance Section of 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of startup 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's regional office responsible for the area within which you are located within 15 days after the actual startup of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
http://dnr.mo.gov/regions/
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 (S12, T46N, R33W)

1. Superseding Condition
   The conditions of this permit supersede Special Condition 2 found in Construction Permit 102007-012, previously issued by the Air Pollution Control Program.

2. VOC and HAP Emission Limitations
   A. ROM Corporation shall emit less than 40.0 tons of VOCs in any consecutive 12-month period from the entire installation (see emission points listed below).
       1) EP-01 Metal Finish Cleaning
       2) EP-02 Metal Spray Painting/Finishing
       3) EP-03 Lamination
       4) EP-04 General Cleaning
       5) EP-05 Loadmaster Spray Painting
   B. ROM Corporation shall emit less than 10.0 tons individually and 25.0 tons combined of HAPs in any consecutive 12-month period from the entire installation (see emission points listed above).
   C. Attachment A, Attachment B & Attachment C or equivalent forms, such as electronic forms approved by the Air Pollution Control Program, shall be used to demonstrate compliance with Special Conditions 2.A & 2.B.

3. Capture Device Requirement – Paint Booth
   A. ROM Corporation shall capture emissions from the automated paint machines (EP-02) using a paint booth, as specified in the permit application.
   B. All doorways into the booth shall be closed during operation, and all fresh air vents shall be equipped with visual indicators, such as streamers, that show air flow into the booth.

4. Control Device Requirement – Paint Booth Filters
   A. ROM Corporation shall control emissions from the automated paint machines (EP-02) using paint booth filters, as specified in the permit application.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

B. The filters shall be operated and maintained in accordance with the manufacturer's specifications.

C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

D. ROM Corporation shall maintain a copy of the filter manufacturer's performance warranty on site.

E. ROM Corporation shall maintain an operating and maintenance log for the paint booths, which shall include the following:
   1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

5. Paint Gun Usage Restriction
   ROM Corporation shall not use more than two (2) spraying machines at a time in the paint booth.

6. Record Keeping and Reporting Requirements
   A. ROM Corporation 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.

   B. ROM Corporation 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 shows an exceedance of a limitation imposed by this permit.
REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW
Project Number: 2017-01-042
Installation ID Number: 037-0061
Permit Number: 042017-007

Installation Address:
ROM Corporation
6800 East 163rd Street
Belton, MO 64012

Parent Company:
Safe Fleet
6800 East 163rd Street
Belton, MO 64012

Cass County (S12, T46N, R33W)

REVIEW SUMMARY

- ROM Corporation has applied for authority to install two automated paint machines and a curing oven.

- The application was deemed complete on January 25, 2017.

- HAP emissions are expected from the proposed equipment. HAPs of concern from this process include cumene, ethylbenzene, methyl isobutyl ketone (MIBK), methyl methacrylate (MMA), naphthalene, styrene, toluene, and xylene.

- None of the NSPS or NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.

- Paint booth filters are being used to control particulate matter 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 VOC and HAP emissions are conditioned below de minimis levels.

- This installation is located in Cass 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.

- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal or applicable rules.

- No Operating Permit is required for this installation.
• 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 are used in food distribution, fire service, and building security industries. The installation is a de minimis source for all air pollutants and currently has a Basic Operating Permit under project number 2012-04-080, which expires October 14, 2017.

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

Table 1: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>112003-006</td>
<td>New metal fabrication plant</td>
</tr>
<tr>
<td>032004-011</td>
<td>Installation of a spray booth</td>
</tr>
<tr>
<td>102007-012</td>
<td>Expansion of painting area and addition of a pre-treat system</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

ROM Corporation is installing two new automated paint machines (EP-02) and a curing oven (EP-02A). The new automated equipment will replace the existing manually applied wet paint process used to paint ROM Corporation's Shutter product. The manual process is time consuming, has multiple quality issues, and requires various rework processes for approximately 90% of the painted product. The new automated process is expected to utilize less paint, require less overall process time, and establish a much more consistent operation.

The IRIDE 206 Profile Spray Paint Machine is a linear paint/varnish spraying machine used for high throughput spraying of profile materials. The 206 model can accept up to six paint heads in two banks in a downdraft environment to capture and contain overspray. It utilizes removable downdraft vats to facilitate rapid sealer/color/clear liquid changeover and cleaning. The automated machine is able to paint linear materials at a rate approximately three times faster than the current manual process. Additionally, paint application is primarily on a horizontal surface, which allows a faster film build without compromising finish quality. Precise control over the paint application rate should reduce paint usage up to 30% compared to the current manual process.

ROM Corporation will manually input their product into a stacking machine that will index it onto trolleys. The trolleys will be maneuvered into the paint booth, where the product will be painted a maximum of eight times, which includes one layer of primer, up to four layers of color, and up to three layers of clear coat. This will generate a coating thickness between 2.9 and 4.3 mil. The automated paint machines will run at 120 feet
per minute, and the paint machines will have a total maximum application rate of 23.78 gallons per hour. After all the coats are applied, the trolleys will be rolled into the 0.75 MMBtu/hr natural gas fired cure oven, where the product will be dried for 2 hours at 180°F before being assembled.

EMISSIONS/CONTROLS EVALUATION

Potential VOC and HAP emissions from the automated paint machines (EP-02) were calculated using a mass balance approach. The volatile content and constituent HAP content of each compound used in the paint machines were taken from the SDS. Each fundamental compound was categorized as a primer, color, or clear coat. The compounds with the highest VOC/constituent HAP content were each assumed to be utilized 100% of the time for each coating category. This allows for a worst case scenario, where each constituent HAP is utilized at its maximum. It was assumed that all products are coated with one layer of primer, four layers of color, and three layers of clear coat. The maximum volatile content and constituent HAP content of each coating category was multiplied by the maximum design rate of the paint machines and multiplied by the number of applied layers out of the total coating to obtain a maximum VOC/HAP application rate. It was assumed that 100% of applied VOCs and HAPs are emitted. All other compounds used in association with the paint machines (hardeners, reducers, catalysts, etc.) are utilized in lesser amounts than the categorized coatings, and are therefore assumed not to increase potential VOC/HAP emissions if accounted for in the total application rate.

Potential particulate emissions from the automated paint machines (EP-02) were also calculated using a mass balance approach. The solids content of each compound used by the paint machines was taken from the SDS. Each fundamental compound was categorized as a primer, color, or clear coat. The compounds with the highest solids content were each assumed to be utilized 100% of the time for each coating category, which allows for a worst case scenario. It was assumed that all products are coated with one layer of primer, four layers of color, and three layers of clear coat. The maximum solids content of each coating category was multiplied by the maximum design rate of the paint machines, multiplied by the number of applied layers out of the total coating, and multiplied by a solids transfer efficiency of 50% for the automatic air spray guns [taken from the spray coating section of the APTI document *Sources and Control of Volatile Organic Air Pollutants* (November 2002)] to obtain a maximum solids application rate. It was assumed that all emitted solids are PM$_{2.5}$.

Paper filters will be installed within the automated paint machines, as well as within the ductwork of the paint booth. The overall control efficiency of the filters was taken to be 98% for all particulates.

The following table provides an emissions summary for this project. Existing potential emissions were taken from the installation's previous construction permit (102007-012). Existing actual emissions were taken from the installation's 2015 EIQ. Potential emissions of the project represent the potential of the new equipment, assuming continuous operation (8,760 hours per year). New installation conditioned potential emissions account for installation-wide de minimis limits for VOCs and HAPs.

<table>
<thead>
<tr>
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<th></th>
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</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>N/D</td>
<td>N/D</td>
<td>9.76</td>
<td>N/D</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>15.0</td>
<td>1.85</td>
<td>N/D</td>
<td>9.76</td>
<td>11.61</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>9.76</td>
<td>N/D</td>
</tr>
<tr>
<td>SOₓ</td>
<td>40.0</td>
<td>N/D</td>
<td>N/D</td>
<td>0.002</td>
<td>N/D</td>
</tr>
<tr>
<td>NOₓ</td>
<td>40.0</td>
<td>0.62</td>
<td>N/D</td>
<td>0.32</td>
<td>0.94</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>47.06</td>
<td>5.46</td>
<td>377.71</td>
<td>&lt;40.0</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>0.52</td>
<td>N/D</td>
<td>0.27</td>
<td>0.79</td>
</tr>
<tr>
<td>Cumene</td>
<td>10.0 / 10</td>
<td>N/D</td>
<td>N/D</td>
<td>8.26</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>10.0 / 10</td>
<td>&lt;10.0</td>
<td>N/D</td>
<td>22.20</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>MIBK</td>
<td>10.0 / 10</td>
<td>&lt;10.0</td>
<td>N/D</td>
<td>12.57</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>MMA</td>
<td>10.0 / 10</td>
<td>N/D</td>
<td>N/D</td>
<td>3.16</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>Naphthalene</td>
<td>10.0 / 10</td>
<td>N/D</td>
<td>N/D</td>
<td>0.48</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>Styrene</td>
<td>10.0 / 1</td>
<td>&lt;10.0</td>
<td>N/D</td>
<td>3.16</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>Toluene</td>
<td>10.0 / 10</td>
<td>&lt;10.0</td>
<td>N/D</td>
<td>14.58</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>Xylene</td>
<td>10.0 / 10</td>
<td>&lt;10.0</td>
<td>N/D</td>
<td>89.75</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>25.0</td>
<td>&lt;25.0</td>
<td>1.56</td>
<td>154.17</td>
<td>&lt;25.0</td>
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</tbody>
</table>

N/D = Not Determined

**AMBIENT AIR QUALITY IMPACT ANALYSIS**

Ambient air quality modeling was performed to determine the ambient impact of styrene. Potential styrene emissions are 3.16 tons per year, which exceeds the SMAL of 1 ton per year, thus requiring modeling. Modeling was performed using EPA's AERSCREEN. The maximum modeled impact for styrene was found to be less than the risk assessment levels (RALs) for both the 24-hour and annual averaging times. This means that although the SMAL for styrene is exceeded, the facility is expected to be in compliance with the RALs. No further analysis is necessary.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>RAL (µg/m³)</th>
<th>Averaging Time</th>
<th>Modeled Impact (µg/m³)</th>
<th>Limited Impact (µg/m³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Styrene</td>
<td>2,240</td>
<td>24-hour</td>
<td>154.9</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>333</td>
<td>Annual</td>
<td>25.8</td>
<td>N/A</td>
</tr>
</tbody>
</table>
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 VOC and HAP emissions are conditioned 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

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

- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110
  - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.

- Restriction of Emission of Odors, 10 CSR 10-6.165

- 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

SPECIFIC REQUIREMENTS

- Control of Emissions From Industrial Surface Coating Operations, 10 CSR 10-2.230, does not apply because the installation is not located in Clay, Jackson, or Platte County
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, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 20, 2017, received January 23, 2017, designating Safe Fleet as the owner and operator of the installation.
Attachment A – VOC Compliance Worksheet

ROM Corporation
Cass County (S12, T46N, R33W)
Project Number: 2017-01-042
Installation ID Number: 037-0061
Permit Number: 042017-007

This sheet covers the month of _______ in the year ___ _

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, EP-#)</td>
<td>Density (lb/gal)</td>
<td>VOC Content (%)</td>
<td>Monthly Amount Used (gal)</td>
<td>Monthly VOC Emissions (tons)</td>
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</tbody>
</table>

F Monthly VOC Emissions from the Curing Oven [EP-02A] (tons): 0.0015
G Monthly VOC Startup, Shutdown, and Malfunction Emissions (tons):
H Total Monthly VOC Emissions (tons):
I 12-Month Rolling Total VOC Emissions from Previous Month (tons):
J Total Monthly VOC Emissions from Previous Year (tons):
K Current 12-Month Rolling Total VOC Emissions (tons):

1 These values shall be taken from the SDS. If a range is given, use the maximum value.
2 Calculate using the following equation: $[E] = [B] \times [C] \times [D] \div 2,000$
3 As reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to 10 CSR 10-6.050
4 Add all values above from Column [E]
5 Enter the value from Row [K] of the previous month’s Attachment A
6 Enter the value from Row [H] of the previous year’s Attachment A
7 Calculate using the following equation: $[K] = [H] + [I] - [J]$

A value of less than 40.0 tons in Row [K] is required for compliance with Special Condition 2.A.

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### Attachment B – Combined HAP Compliance Worksheet

ROM Corporation  
Cass County (S12, T46N, R33W)  
Project Number: 2017-01-042  
Installation ID Number: 037-0061  
Permit Number: 042017 - 007

This sheet covers the month of _______ in the year _______

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used (Name, HAP, CAS#)</td>
<td>Density (lb/gal)</td>
<td>Individual HAP Content (%)</td>
<td>Monthly Amount Used (gal)</td>
<td>2 Monthly Combined HAP Emissions (tons)</td>
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</tbody>
</table>

F  Monthly Combined HAP Emissions from the Curing Oven [EP-02A] (tons): 0.0005

G  2 Monthly Combined HAP Startup, Shutdown, and Malfunction Emissions (tons):

H  4 Total Monthly Combined HAP Emissions (tons):

I  512-Month Rolling Total Combined HAP Emissions from Previous Month (tons):

J  6 Total Monthly Combined HAP Emissions from Previous Year (tons):

K  7 Current 12-Month Rolling Total Combined HAP Emissions (tons):

1 These values shall be taken from the SDS (If a range is given, use the maximum value)
2 Calculate using the following equation: \[ E = [B] \times [C] \times \frac{[D]}{2000} \]
3 As reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to 10 CSR 10-6.050
4 Add all values above from Column [E]
5 Enter the value from Row [K] of the previous month’s Attachment B
6 Enter the value from Row [H] of the previous year’s Attachment B
7 Calculate using the following equation: \[ [K] = [H] + [I] - [J] \]

A value of less than 25.0 tons in Row [K] is required for compliance with Special Condition 2.B.
Attachment C – Individual HAP Compliance Worksheet

ROM Corporation
Cass County (S12, T46N, R33W)
Project Number: 2017-01-042
Installation ID Number: 037-0061
Permit Number: 42017-007

Individual HAP Name: ________________ CAS # ___________ (use one sheet for each HAP)

This sheet covers the month of ___________ in the year ______

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used that Contains the HAP Specified Above</td>
<td>Individual HAP Emissions (tons)</td>
</tr>
<tr>
<td>D</td>
<td>12-Month Rolling Total Individual HAP Emissions from Previous Month (tons):</td>
</tr>
<tr>
<td>E</td>
<td>Monthly Individual HAP Emissions from Previous Year (tons):</td>
</tr>
<tr>
<td>F</td>
<td>Current 12-Month Rolling Total Individual HAP Emissions (tons):</td>
</tr>
</tbody>
</table>

1 List each material (listed in Column [A] from Attachment A) that contains the individual HAP specified above
2 Enter the respective HAP emissions for each material (listed in Column [E] from Attachment B)
3 Add all values above from Column [B] (Individual HAP emissions from the Curing Oven [EP-02A] are considered negligible)
4 Enter the value from Row [F] of the previous month’s Attachment C for this individual HAP
5 Enter the value from Row [C] of the previous year’s Attachment C for this individual HAP
6 Calculate using the following equation: [F] = [C] + [D] – [E]

A value of less than 10.0 tons in [F] is required for compliance with Special Condition 2.B.
APPENDIX A

Abbreviations and Acronyms

%..............percent
°F................degrees Fahrenheit
acfm............actual cubic feet per minute
BACT...........Best Available Control Technology
BMPs...........Best Management Practices
Btu............British thermal unit
CAM...........Compliance Assurance Monitoring
CAS...........Chemical Abstracts Service
CEMS.........Continuous Emission Monitor System
CFR..........Code of Federal Regulations
CO.............carbon monoxide
CO₂..........carbon dioxide
cO₂e...........carbon dioxide equivalent
COMS.........Continuous Opacity Monitoring System
CSR..........Code of State Regulations
dscf...........dry standard cubic feet
EIQ...........Emission Inventory Questionnaire
EP...........Emission Point
EPA..........Environmental Protection Agency
EU...........Emission Unit
fps............feet per second
ft............feet
GACT.........Generally Available Control Technology
GHG...........Greenhouse Gas
gpm...........gallons per minute
gr.............grains
GWP..........Global Warming Potential
HAP..........Hazardous Air Pollutant
hr............hour
hp...........horsepower
lb............pound
lbs/hr.........pounds per hour
MACT.........Maximum Achievable Control Technology
µg/m³..........micrograms per cubic meter
m/s...........meters per second
Mgal.........1,000 gallons
MW...........megawatt
MHDR.........maximum hourly design rate
MMBtu.......Million British thermal units
MMCF........million cubic feet
MSDS.........Material Safety Data Sheet
NAAQS.......National Ambient Air Quality Standards
NESHAPs.....National Emissions Standards for Hazardous Air Pollutants
NOₓ...........nitrogen oxides
NSPS........New Source Performance Standards
NSR.........New Source Review
PM...........particulate matter
PM₂·₅........particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀.........particulate matter less than 10 microns in aerodynamic diameter
ppm..........parts per million
PSD.........Prevention of Significant Deterioration
PTE.........potential to emit
RACT.........Reasonable Available Control Technology
RAL.........Risk Assessment Level
SCC.........Source Classification Code
scfm..........standard cubic feet per minute
SDS..........Safety Data Sheet
SIC.........Standard Industrial Classification
SIP.........State Implementation Plan
SMAL........Screening Model Action Levels
SOₓ...........sulfur oxides
SO₂..........sulfur dioxide
tph..........tons per hour
tpy..........tons per year
VMT.........vehicle miles traveled
VOC.........Volatile Organic Compound
RE: New Source Review Permit - Project Number: 2017-01-042

Dear Mr. Baleta:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions 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 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.

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 the following website: http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/abc.
If you have any questions regarding this permit, please do not hesitate to contact Ryan Schott, at the Department of Natural Resources’ Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

Enclosures

c: Kansas City Regional Office
PAMS File: 2017-01-042

Permit Number: 042017-007