

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2017-068  
**Expiration Date:** NOV 08 2022  
**Installation ID:** 510-2752  
**Project Number:** 2016-02-004

**Installation Name and Address**

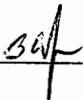
Shelter Works  
2616 South Third Street  
St. Louis, MO 63118-1918  
St. Louis City

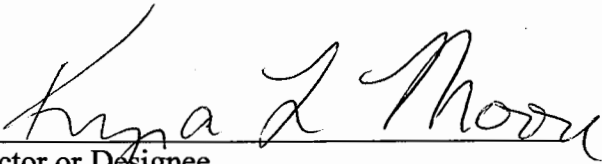
**Parent Company's Name and Address**

Shelter Works  
2616 South Third Street  
St. Louis MO, 63118

**Installation Description:**

Shelter Works owns and operates a fiberglass shelter manufacturing plant in St. Louis. Equipment at the installation consists of two natural gas-fired makeup air heaters and a fiberglass gelcoat/resin spraying operation. Shelter Works is a minor source for VOCs and a major source for styrene and total HAPs.

  
Prepared by  
Bern Johnson  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

NOV 08 2017

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Emission Point #	Description
EP01A	Interior Gel Coat System, 3000 ft <sup>2</sup> /day
EP01B	Exterior Gel Coat Application, 3000 ft <sup>2</sup> /day
EP01C	Resin Application, 3000 ft <sup>2</sup> /day

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Emission Point #	Description
EP02	fiberglass trimming equipment, 3000 ft <sup>2</sup> /day
EP03	natural gas fired building space heater, 2.475 MMBTU/hr
EP04	natural gas fired heater, 2.073 MMBTU/hr

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

### PERMIT CONDITION PW 1

10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(6)(C)1. Voluntary Limitation(s)  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit #062015-016 Issued June 29, 2015

#### Emission Limitations:

- 1) The permittee shall emit less than 100.0 tons of volatile organic compounds (VOCs) in any rolling 12-month period from the entire installation, which includes the fiberglass spray system (EP01A, EP01B, and EP01C) and the natural-gas fired heaters (EP03 and EP04). [Special Condition 2.B.]

#### Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of VOC emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment D). [Special Condition 2.D.]
- 2) All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

#### Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month in which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification report required by Section V of this permit.

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

<b>PERMIT CONDITION 1</b> 10 CSR 10-6.060 Construction Permits Required Construction Permit #062015-016 Issued June 29, 2015	
Emission Unit	Description
EP01A	Interior Gel Coat System
EP01B	Exterior Gel Coat Application
EP01C	Resin Application

#### **Emission Limitations:**

- 1) The permittee shall emit less than 10.0 tons of methyl methacrylate (MMA) in any rolling 12-month period from the fiberglass spray system (EP01). [Special Condition 2.A.]
- 2) The permittee shall emit styrene emissions no more than the following: [Special Condition 2.C.]
  - a) 117.1 lb/day from the interior gelcoat application (EP01A)
  - b) 239.7 lb/day from the exterior gelcoat application (EP01B)
  - c) 308.3 lb/day from the resin application (EP01C)

#### **Operational Limitations:**

- 1) The exhaust fans shall be on at all times when the fiberglass spray system (EP01A, EP01B, and EP01C) is in operation. [Special Condition 3.A.]
- 2) The permittee shall keep all chemicals (e.g. solvents, coatings, gelcoats, resins, etc.) in sealed containers whenever the materials are not in use. It shall provide and maintain suitable, easily read, permanent markings on all solvent and coatings containers use at the installation. [Special Condition 3.B.]
- 3) All doors and windows at the building shall remain closed during normal operations except for personnel and equipment entry and exit (i.e. there should no propping open of the door and windows, etc.) [Special Condition 3.C.]
- 4) When considering the use of alternative gelcoats, resins, and catalysts at the installation that is different than a material listed in the Application for Authority to Construct, the permittee shall calculate the potential emissions of all individual HAP in the alternative material, except for styrene and MMA, on an annual basis. For styrene, the potential emissions shall be calculated on a 24-hour basis. For MMA, no calculation is needed. [Special Condition 4.A.]
- 5) The permittee shall seek approval from the Air Pollution Control Program before the use of the alternative material if the following occurs. [Special Condition 4.B.]
  - a) The styrene emissions, on a 24-hour basis, exceed the values in **Emission Limitation 2**.
  - b) Individual HAP emissions, except for styrene and MMA, are equal to or greater than their respective screening model action level (SMAL). A list of current SMAL can be found at <http://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>.

- 6) Once the permittee begin using the alternative gelcoats, resins, and catalysts, it shall include the MMA and VOC emissions from the alternative material in the emissions limit and tracking worksheets. [Special Condition 4.D.]

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an accurate record of VOC emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment D). [Special Condition 4.C.]
- 2) All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month in which the permittee determines that the installation exceeded any of the emission limitations listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification report required by Section V of this permit.

<b>Permit Condition 2</b>		
10 CSR 10-6.075 40 CFR Part 63, Subpart WWWW		
National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production		
Emission Unit	Description	Manufacturer
EP01A	Interior Gel Coat System	AGA & NARA
EP01B	Exterior Gel Coat Application	AGA & NARA
EP01C	Resin Application	AGA & NARA

**Emission Limitations**

The permittee must meet the emission limitations found in Attachment B, except during periods of startup, shutdown, or malfunction. [§63.5805(b) and §63.5835(b); §63.5900(c) and (d) ]. *(The permittee has elected to use the weighted average emission limit option, §63.5810(c) to show compliance with Subpart WWWW).*

**Operational Limitations**

The permittee must meet the work practices in Attachment C, including during periods of startup, shutdown, or malfunction. [§63.5805(b) and §63.5835(b); §63.5900(c) and (d)]

**Monitoring:**

- 1) The permittee must demonstrate each month that it meets each applicable weighted average of the organic HAP emissions limits in Attachment B. When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations. Open molding operations and centrifugal casting operations may not be averaged with each other. The permittee uses custom spreadsheets for emissions tracking. [§63.5810(c)]
  - a) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the last 12-month period to determine the organic HAP emissions limit the

permittee must meet. To do this, multiply the individual organic HAP emissions limits in Attachment B for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in the equation below. [§63.5810(c)(1)]

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

Where:

- EL<sub>i</sub> = organic HAP emissions limit for operation type i, lbs/ton from Attachment B;
- Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;
- n = number of operations.

- b) Each month calculate the weighted average organic HAP emissions factor for open molding. To do this, multiply the permittee's actual open molding operation organic HAP emissions factors calculated in its custom worksheet and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown below in Equation 4 of §63.5810. [§63.5810(c)(2)]

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

Where:

- Actual Individual EF<sub>i</sub> = Actual organic HAP emissions factor for operation type i, lbs/ton;
- Material<sub>i</sub> = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;
- n = number of operations.

- c) Compare the values calculated in a) and b). If each 12-month rolling actual weighted average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling weighted average organic HAP emissions limit, then the permittee are in compliance. [§63.5810(c)(3)]
- 2) The permittee may use the equations in Table 1 to Subpart WWWW to calculate emissions factors. Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for the permittee to demonstrate compliance without the need to conduct a HAP emissions test. In lieu of these equations, the permittee can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the permittee site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. The permittee may also use the organic HAP emissions factors calculated using

the equations in Table 1 to Subpart WWWW, combined with resin and gel coat use data, to calculate organic HAP emissions. [§63.5796]

- 3) In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and safety data sheets (SDS), using the procedures specified in a) through c), as applicable. [§63.5797]
  - a) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. [§63.5797(a)]
  - b) If the organic HAP content is provided by the material supplier or manufacturer as a range, the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR Part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance. [§63.5797(b)]
  - c) If the organic HAP content is provided as a single value, the permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee must use the measured organic HAP content to determine compliance. [§63.5797(c)]
- 4) If the permittee wishes to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to Subpart WWWW, the permittee may use the procedures in a) or b) below to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in Subpart WWWW, and to calculate facility organic HAP emissions. [§63.5798]
  - a) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850. [§63.5798(a)]
  - b) Submit a petition to the Administrator for administrative review of Subpart WWWW. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to Subpart WWWW. [§63.5798(b)]
- 5) Calculating Organic HAP Emissions Factors for Open Molding:
  - a) Emissions factors are used in Subpart WWWW to determine compliance with certain organic HAP emissions limits in Attachment B. The permittee may use the equations in Table 1 to Subpart WWWW to calculate emissions factors. Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for the permittee to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, the permittee can elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the site-specific organic HAP emissions factors are incorporated in the permittee's Operating Permit and are based on actual installation HAP emissions test data. The permittee may also use the organic HAP emissions factors calculated using the equations in Table 1 to



Subpart WWWW, combined with resin and gel coat use data, to calculate organic HAP emissions. [§63.5796]

- b) If the permittee wishes to use a resin or gel coat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 to Subpart WWWW, the permittee may use the procedures in a) or b) to establish an organic HAP emissions factor. This organic HAP emissions factor may then be used to determine compliance with the emission limits in this permit condition, and to calculate installation organic HAP emissions. [§63.5798]
  - i) Perform an organic HAP emissions test to determine a site-specific organic HAP emissions factor using the test procedures in §63.5850. [§63.5798(a)]
  - ii) Submit a petition to the Administrator for administrative review of Subpart WWWW. This petition must contain a description of the resin or gel coat application technology and supporting organic HAP emissions test data obtained using EPA test methods or their equivalent. The emission test data should be obtained using a range of resin or gel coat HAP contents to demonstrate the effectiveness of the technology under the different conditions, and to demonstrate that the technology will be effective at different sites. We will review the submitted data, and, if appropriate, update the equations in Table 1 to Subpart WWWW. [§63.5798(b)]

**Recordkeeping:**

- 1) The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the permittee are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 (see Attachment B) to Subpart WWWW. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. The permittee has created a custom spreadsheet for VOC, styrene, methyl methacrylate (MMA), and total hazardous air pollutant (HAP) tracking. Air Program staff have reviewed this spreadsheet and determined it is sufficient for this requirement (see Attachments D). [§63.5895(c)]
- 2) The permittee shall keep the following records: [§63.5915(a)]
  - a) A copy of each notification and report that the permittee submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.5915(a)(1)]
  - b) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2). [§63.5915(a)(3)]
- 3) The permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Attachment B. [§63.5915(c)]
- 4) The permittee shall keep a certified statement that the permittee are in compliance with the work practice requirements in Attachment C, as applicable. [§63.5915(d)]
- 5) The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]
- 6) As specified in §63.10(b)(1), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]
- 7) The permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records offsite for the remaining 3 years. [§63.5920(c)]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month in which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification report required by Section V of this permit.
- 3) If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the director within 15 calendar days after the change. [§63.5905(b)]
- 4) The permittee's compliance report shall contain the following information:
  - a) Company name and address. [§63.5910(c)(1)]
  - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
  - c) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
  - d) If there are no deviations from any **Emission Limitations** or **Operational Limitations**, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]
- 5) For each deviation from an organic HAP **Emission Limitations** or **Operational Limitations**, the compliance report shall contain the information in 2)a)-c) and the following, including periods of startup, shutdown, and malfunction:
  - a) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]
  - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]
- 6) The permittee shall submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to Subpart WWWW, and not based on the requirements in §63.999. [§63.5910(h)]
- 7) Where multiple compliance options are available, the permittee shall state in the next compliance report if compliance options have changed since the last compliance report. [§63.5910(i)]

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

#### **10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos**

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

#### **10 CSR 10-6.100 Alternate Emission Limits**

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

**10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

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

**This is a State Only permit requirement.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**10 CSR 10-6.170**

**Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

**Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
  - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
  - b) If a violation is noted, monitoring reverts to weekly.
  - c) Should no violation of this regulation be observed during this period then-

- i) The permittee may observe once per month.
  - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

The permittee shall document all readings, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether equipment malfunctions contributed to an exceedance.
- 3) Any violations and any corrective actions undertaken to correct the violation.

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

**10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
  - a) Monitoring methods outlined in 40 CFR Part 64;

- b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

#### **40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air

conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*



## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

### **10 CSR 10-6.065(6)(C)1.B, 10 CSR 10-6.065(6)(E)3.C Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### **10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

#### **10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)**

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

#### **10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

**10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None

**10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

### **10 CSR 10-6.065(6)(C)8 Operational Flexibility**

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

emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Tracy Switzer, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or

operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

#### **10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

#### **10 CSR 10-6.065(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## **VI. Attachments**

Attachments follow.



**Attachment B**

Table 3 to Subpart WWWW of Part 63 — Organic HAP Emissions Limits

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

<b>Composite MACT Emission Rate Limits - Table 3 to Subpart WWWW</b>		
<b>PROCESS</b>	<b>SUBCATEGORY</b>	<b>EXISTING SOURCE EMISSION LIMIT (lb/ton)</b>
<b>Gelcoat Application</b> Atomized, Non-Atomized, Robotic, or Manual	Clear	<b>522</b>
	Pigmented - White/Off White	<b>267</b>
	All Other Pigmented	<b>377</b>
	Corrosion Resistant/High Strength (HS) or High Performance	<b>605*</b>
	Fire Retardant	<b>854</b>
	Tooling	<b>440*</b>
<b>Manual Resin</b> Vapor-Suppressed or Non-Suppressed	Non-Corrosion/Non-HS	<b>87</b>
	Corrosion Resistant and/or HS	<b>123</b>
	Low Flame Spread & Low Smoke	<b>238</b>
	Shrinkage Controlled	<b>180</b>
	Tooling	<b>157</b>
<b>Mechanical Resin</b> Atomized or Non-Atomized Vapor-Suppressed or Non-Suppressed	Non-Corrosion/Non-HS	<b>88*</b>
	Corrosion Resistant and/or HS	<b>113*</b>
	Low Flame Spread & Low Smoke	<b>497</b>
	Shrinkage Controlled	<b>354</b>
	Tooling	<b>254</b>
<b>Filament Winding</b> Vapor-Suppressed or Non-Suppressed	Non-Corrosion/Non-HS	<b>188</b>
	Corrosion Resistant and/or HS	<b>171*</b>
	Low Flame Spread & Low Smoke	<b>270</b>
	Shrinkage Controlled	<b>215</b>
<b>Centrifugal Casting</b>	Non-Corrosion/Non-HS	<b>20</b>
	Corrosion Resistant and/or HS	<b>25</b>

The MACT limit values for existing sources were obtained from Table 3 to Subpart WWWW of Part 63 - FR Vol 68 No 76, April 21, 2003, pp 19419

\* - Revised by U.S. EPA on August 2005

Taken from spreadsheet "Tables 1 and 2 ShelterWorks ERC xxxx"



**Attachment C**

Table 4 to Subpart WWWW of Part 63 — Work Practice Standards

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

<b>For ...</b>	<b>The permittee must ...</b>
1. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
2. a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
3. all mixing or BMC manufacturing operations <sup>1</sup>	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
4. all mixing or BMC manufacturing operations <sup>1</sup>	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
5. all mixing or BMC manufacturing operations <sup>1</sup>	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

<sup>1</sup>Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Note: these are the five of nine work practice standards that apply to the installation from Table 4.

**Attachment D**  
Custom Tracking Worksheets

If electronic forms are used, they must contain at minimum the following:

**Plantwide PW 1 emission limit:**

- Include emissions from EP01A, EP01B, and EP01C and natural gas combustion. Emissions may be grouped by type; for example, all natural gas combustion sources may be grouped and tracked together by fuel usage. Include installation insignificant sources.
- Record monthly throughput of all interior (EP01A) and exterior (EP01B) gelcoats and resins (EP01C)
  - emission factor is calculated monthly from Safety Data Sheets
- Record monthly natural gas usage. Purchase receipts are sufficient.
  - emissions factor of 5.3 lbs VOC/MMSCF (WebFIRE SCC 10500106)
- Calculate monthly VOC emissions by multiplying throughput and emission factor for each type.
- Calculate rolling 12-month VOC emissions by adding current month's emissions to previous eleven months emissions
- Compare emission total to limit and indicate whether or not compliance was met
- Include SSM emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program in accordance with 10 CSR 10- 6.050.

**Permit Condition 1 emission limits:**

- Include methyl methacrylate (MMA) and styrene emissions from EP01A, EP01B, and EP01C.
- For Styrene daily limit: record daily throughput measured in square feet laminate
  - emissions factors are calculated using the Subpart WWWW method described in Permit Condition 2
- For MMA: record monthly throughput of all interior and exterior gelcoats and resins
  - emission factor is calculated monthly from Safety Data Sheets
- Calculate daily or monthly emissions by multiplying throughput and emission factor
- Calculate rolling 12-month MMA emissions in tons pollutant by adding current month's emissions to previous eleven months emissions
- Compare emission total to limit and indicate whether or not compliance was met
- Include SSM emissions from point or group of points, if any, from the same 12 month period as reported to the Air Pollution Control Program in accordance with 10 CSR 10- 6.050.

## STATEMENT OF BASIS

### Installation Description

Shelter Works owns and operates a fiberglass shelter manufacturing plant in St. Louis. Equipment at the installation consists of two natural gas-fired makeup air heaters and a fiberglass gelcoat/resin spraying operation. Various trimming equipment, such as diamond cutting tools, random orbital sanders, and grinders, are also used at the facility. The trimming equipment is done inside an enclosed trim booth with a dust collection system. The exhaust from the trim booth is returned to the production building.

Before Construction Permit #062015-016 was issued, this installation was considered a minor source and was not required to apply for an operating permit. After the issuance of this permit, the installation became a major source for styrene and total HAPs, but remained a minor source for VOCs. Shelter Works is not a named source and fugitive emissions are not counted for potential-to-emit.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)	Pollutant	Potential to Emit (tons/yr)
PM <sub>10</sub>	13.43	Total HAPs	140.13
PM <sub>2.5</sub>	7.81	Styrene	121.41
SO <sub>x</sub>	0.0005	methyl methacrylate	18.72
NO <sub>x</sub>	0.09	dimethylphthalate	0.004
VOC	151.8		
CO	0.07		

PTE from Construction Permit 062015-016

### Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
PM <sub>10</sub>	0.01	0.05	0.10	0.10	0.10
PM <sub>2.5</sub>	0.01	0.01	0.03	0.03	0.03
SO <sub>x</sub>	0.00	0.00	0.00	0.00	0.00
NO <sub>x</sub>	0.00	0.00	0.00	0.00	0.00
VOC	7.85	10.08	7.09	7.09	7.09
CO	0.00	0.00	0.00	0.00	0.00
Styrene	6.33	8.07	5.67	5.67	5.67
methyl methacrylate	0.98	1.24	0.88	0.88	0.88
HAPs	7.31	9.31	6.55	6.55	6.55

note – styrene, MMA, and total HAPs are not reported to MOEIS; the values in the table are calculated based on PTE fractions.

### **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received February 2, 2016;
- 2) 2016 Emissions Inventory Questionnaire, received April 28, 2017;
- 3) WebFIRE; and
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

### **Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-5.570 *Control of Sulfur Emissions from Stationary Boilers* – this rule does not apply to the heaters because they are not boilers.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* - EP-02 Trimming is exempt from this rule because trimming operations are completely contained inside the building [(1)(O)] EP-03 and EP-04 combust only natural gas [(1)(L)].

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – all combustion equipment at the installation uses pipeline grade natural gas. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels are exempt from the requirements of these rules [(1)(A)(2) and (1)(A)].

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* – EP-02 is exempt from this rule because its uncontrolled particulate matter PTE is 0.375 lb/hr (from CP 062015-016), which is less than the 0.5 lb/hr exemption limit in (1)(B)(12).

### **Construction Permit History**

Construction Permit 062015-016, issued June 29, 2015 for an increase in production rate over previously permitted levels.

01-01-053 and 01-01-053PM issued by the City of St. Louis, Department of Health were superseded by CP 062015-016.

### **New Source Performance Standards (NSPS) Applicability**

None

### **Maximum Achievable Control Technology (MACT) Applicability**

40 CFR 63 Subpart Mmmm, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* does not apply to the installation because fiberglass spraying is not considered a surface coating operation.

40 CFR 63 Subpart Pppp, *National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products* does not apply to the installation because fiberglass spraying is not considered a surface coating operation.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None

### **Compliance Assurance Monitoring (CAM) Applicability**

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

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

### **Other Regulatory Determinations**

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating* - this rule applies to the two heaters. Since these units combust only natural gas, they are considered continually in compliance (1)(C).

### **Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the ACP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the ACP a schedule for achieving compliance for that regulation(s).

## Response to Public Comments

A draft of the Part 70 Operating Permit for Shelter Works was placed on public notice on July 21, 2017, by the Missouri Department of Natural Resources (MDNR). One comment was received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency.

### **Comment #: 1**

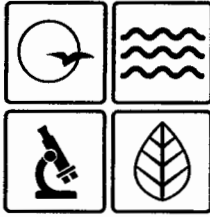
Plant wide Permit Condition PW1 limits the permittee to 100.0 tons of volatile organic compounds (VOC) in any 12-month rolling period from the entire installation, which includes: fiberglass spray system (EP01A, EP01B and EP01C) and the natural gas-fired heaters (EP03 and EP04). Permit Condition PW1 also requires the permittee to maintain an accurate record of monthly and 12-month rolling VOC emissions using compliance tracking spreadsheets developed by the permittee. Examples of the spreadsheets are attached to this draft operating permit as Attachment D and Attachment E. Attachments D and E appear to account for the VOC emissions associated with interior gel coats; exterior gel coats; resins; non-MACT miscellaneous VOC/HAP materials; and non-VOC materials. However, Attachments D and E do not appear to account for the VOC emissions associated with the combustion of natural gas; as stated in the emission limitation.

In its response to a petition filed against the Hu Honua Bioenergy Facility, the EPA reiterates that for purposes of determining the potential-to-emit (PTE) of a stationary source, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Thus, emissions for all emission units that are part of the source's physical and operational design (entire installation) must be included in calculating PTE for purposes of determining limitation compliance, including emission units that have been designated as "without limitations" and any designated "insignificant activities." Similarly, EPA has previously explained that when a source accepts a source-wide limit for a pollutant, all actual emissions of that pollutant from the source must be considered in determining compliance with the limit. Therefore, EPA suggests MDNR consider requesting the permittee to revise their compliance tracking spreadsheets to include the emissions from the combustion of natural gas.

### **Response to Comment:**

Shelter Works uses custom spreadsheets to track emissions. Attachments D and E are screen shots of these large and complex spreadsheets. Emissions from natural gas combustion are tracked and reported to MOEIS, but that data is not captured on these screen shots. The full spreadsheets are too large and complex to include as attachments.

This is a recurring problem with representing the content of custom emissions tracking worksheets. Therefore, Attachments D, E, and F, along with the reference to them in PW1, have been removed and replaced by a new Attachment D, which describes a comprehensive list of requirements for custom emissions tracking worksheets.



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

**NOV 08 2017**

Mr. Tracy Switzer  
Shelter Works  
2616 South Third Street  
St. Louis, MO 63118-1918

Re: Part 70 Operating Permit  
Installation Number: 510-2752, Permit Number: OP2017-068

Dear Mr. Switzer:

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

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:MJSJ

Enclosures

c: PAMS File: 2016-02-004



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