INTERMEDIATE STATE 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.

Intermediate Operating Permit Number: OP2019-026
Expiration Date: AUG 15 2024
Installation ID: 071-0131
Project Number: 2014-07-032

**Installation Name and Address**
Sullivan Precision Metal Finishing
995 North Service Road West
Sullivan, MO 63080
Franklin County

**Parent Company's Name and Address**
Huggins Metal Finishing, Inc.
995 North Service Road West
Sullivan, MO 63080

**Installation Description:**
Sullivan Precision Metal Finishing (SPMF), located in Sullivan, Missouri, has been processing aluminum parts for the aerospace industry since 1978. Pre-fabricated aluminum parts are received from manufacturers. These parts, consisting mostly of helicopter and aircraft pieces, are treated at the facility. Some of the pieces are anodized and others are painted. The finished pieces are then shipped out to assembly plants.

**Effective Date**
AUG 15 2019

**Director or Designee**
Department of Natural Resources
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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS
The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP06</td>
<td>32-Foot Chromic Acid Anodizing Tank</td>
</tr>
<tr>
<td>EP07</td>
<td>Five (5) Paint Booths</td>
</tr>
</tbody>
</table>

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

Description of Emission Source
Two (2) 0.5 MMBtu/hr each Natural Gas Fired Boilers (EP05)
One (1) 1.0 MMBtu/hr Natural Gas Fired Dryer
One (1) 0.5 MMBtu/hr Natural Gas Fired Dryer
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 on the date of permit issuance. 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 Limitations.

<table>
<thead>
<tr>
<th>Permit Condition PW001</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065 Operating Permits</td>
</tr>
<tr>
<td>10 CSR 10-6.020(2)(I)23 and 10 CSR 10-6.065(4)(C)2 Voluntary Limitation(s)</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
1) The permittee shall emit less than 100 tons of volatile organic compounds (VOC) from the entire installation in any consecutive 12-month period.
2) The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) from the entire installation in any consecutive 12-month period.
3) The permittee shall emit less than 25 tons of combined hazardous air pollutants from the entire installation in any consecutive 12-month period.

**Monitoring/Recordkeeping:**
1) The permittee shall retain data sufficient to demonstrate compliance with each of the above Emission Limitations. This data shall include at a minimum:
   a) The date (month and year).
   b) The amount of VOC material and HAP material handled by each emission unit during the month.
   c) MSDS for each material containing VOC and/or HAP.
   d) VOC and HAP emissions calculations and/or spreadsheets including VOC and HAPS emissions from natural gas and fuel oil combustion equipment.
   e) Monthly VOC, combined HAP, and individual HAP emissions totals.
   f) 12-Month rolling VOC, combined HAP, and individual HAP emissions totals.
   g) Example forms are attached as Attachment B, C, and D. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the VOC and HAPs emission limitation.
2) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include Material Safety Data Sheet (MSDS) for all materials used.
3) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065, §(4)(C)1 and §(5)(C)1.C, General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

** Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after the end of the month during which the records indicate that the source exceeds the emissions limitations.
2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

Permit Condition PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 1297-022, Issued January 27, 1998
Revision Letter for Construction Permit 1297-022 Dated January 6, 1998
Revision Letter for Construction Permit 1297-022 Dated January 27, 1998

Reporting:
Sullivan Precision Metal Finishing will report annually or as part of their annual operating permit certification, the results of their research for methods (e.g. pollution prevention, material substitution, process change, economical control, etc.) to reduce the off-property concentrations of HAPs indicated to be above the acceptable ambient levels shown in Table 2: Screen3 Results of Construction Permit 1297-022.

Permit Condition PW003

10 CSR 10-6.060 Construction Permits Required
Construction Permit 122001-009, Issued November 29, 2001

Work Practice Standard:
Sullivan Precision Metal Finishing shall keep all coatings, primers, topcoats and solvents in sealed containers whenever the materials are not in use. Sullivan Precision Metal Finishing shall provide and maintain suitable, easily read, permanent markings on all coating, primer, topcoat and solvent containers used with this equipment.

Reporting:
The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102 or AirComplianceReporting@dnr.mo.gov, as required by 10 CSR 10 CSR 10-6.065(5)(C)1.

1 This permit condition is State-Only enforceable.
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 on the date of permit issuance.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP06</td>
<td>32-Foot Chromic Acid Anodizing Tank</td>
</tr>
<tr>
<td></td>
<td>Tank Area - 141.3 square feet (ft²)</td>
</tr>
<tr>
<td></td>
<td>Type of Control Technique – Fume Suppressant with Wetting Agent</td>
</tr>
</tbody>
</table>

**PERMIT CONDITION EP06 - 001**

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations

The following conditions apply to the chromium anodizing tank located at a minor facility that uses an add-on air pollution control device/control technique.

**Emission Limitation:**

1) At all times, the permittee must operate and maintain the chromic acid anodizing tank (EP06), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.342(a)(1)]

2) The permittee shall comply with the requirements in §63.342(d)(3) or (4) on and after the compliance dates specified in §63.343(a). The chromic acid anodizing tank (EP06) is regulated by applying maximum achievable control technology. [§63.342(a)(2)]

3) **Applicability of emission limitation:**

   a) The emission limitations in §63.342(d)(3) or (4) apply to the permittee during tank operation as defined in §63.341, and during periods of startup and shutdown as these are routine occurrences for affected sources subject to this subpart. In response to an action to enforce the standards set forth in this subpart, the permittee may assert a defense to a claim for civil penalties for violations of such standards that are caused by a malfunction, as defined in 40 CFR 63.2. Appropriate penalties may be assessed, however, if the permittee fails to meet the burden of proving all the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief. [§63.342(b)(1)]
i) To establish the affirmative defense in any action to enforce such a standard, the permittee must timely meet the reporting requirements of §63.342(b)(1)(ii), and must prove by a preponderance of evidence that: [§63.342(b)(1)(i)]

(A) The violation was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal and usual manner; and could not have been prevented through careful planning, proper design or better operation and maintenance practices; and did not stem from any activity or event that could have been foreseen and avoided, or planned for; and was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and [§63.342(b)(1)(i)(A)]

(B) Repairs were made as expeditiously as possible when exceeded violation occurred. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and [§63.342(b)(1)(i)(B)]

(C) The frequency, amount and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and [§63.342(b)(1)(i)(C)]

(D) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and [§63.342(b)(1)(i)(D)]

(E) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment, and human health; and [§63.342(b)(1)(i)(E)]

(F) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and [§63.342(b)(1)(i)(F)]

(G) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and [§63.342(b)(1)(i)(G)]

(H) At all times, the affected sources were operated in a manner consistent with good practices for minimizing emissions; and [§63.342(b)(1)(i)(H)]

(I) A written root cause analysis was prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the excess emissions resulting from the malfunction event at issue. The analysis shall also specify, using the best monitoring methods and engineering judgment, the amount of excess emissions that were the result of the malfunction. [§63.342(b)(1)(i)(I)]

ii) Report. The permittee seeking to assert an affirmative defense shall submit a written report to the director with all necessary supporting documentation, that it has met the requirements set forth in §63.342(b)(1)(i) (listed above). This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmation defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.

4) During tank operation, the permittee shall control chromium emissions discharged to the atmosphere from the chromic acid anodizing tank by not allowing the surface tension of the anodizing bath contained within the chromic acid anodizing tank to exceed 40 dynes per centimeter (dynes/cm)
(2.8 \times 10^{-3} \text{ pound-force per foot [lbf/ft]}, as measured by a stalagmometer or 33 dynes/cm
(2.3 \times 10^{-3} \text{ lbf/ft}), as measured by a tensiometer at any time during tank operation, or

5) The permittee shall not add perfluorooctane sulfonic acid (PFOS) based fume suppressants to the
chromium anodizing tank. \(63.342(d)(4)\]

6) To comply with the requirements applicable to chromic acid baths, the permittee shall not use a
reducing agent to change the form of chromium from hexavalent to trivalent. \(63.342(g)\]

**Operation and Maintenance Practices:**

1) The permittee shall comply with the following work practice standards \(63.342(f)\]

a) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate
and maintain the tank, including associated air pollution control devices and monitoring
equipment, in a manner consistent with good air pollution control practices, consistent with the
operation and maintenance plan required by \(63.342(f)(3)\). \(63.342(f)(1)(i)\]

b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with
the operation and maintenance plan required by \(63.342(f)(3)\). \(63.342(f)(1)(ii)\]

c) Operation and maintenance requirements established pursuant to section 112 of the Act are
enforceable independent of emissions limitations or other requirements in relevant standards.
\(63.342(f)(1)(iii)\]

2) Determination of whether acceptable operation and maintenance procedures are being used will be
based on information available to the director, which may include, but is not limited to, monitoring
results; review of the operation and maintenance plan, procedures, and records; and inspection of the
source. \(63.342(f)(2)(i)\]

3) Based on the results of a determination made under \(63.342(f)(2)(i)\), the director may require that
the permittee make changes to the operation and maintenance plan required by \(63.342(f)(3)\) for that
source. Revisions may be required if the director finds that the plan:

a) Does not address a malfunction that has occurred; \(63.342(f)(2)(ii)(A)\]

b) Fails to provide for the operation of the affected source, the air pollution control techniques, or
the control system and process monitoring equipment during a malfunction in a manner
consistent with good air pollution control practices; or \(63.342(f)(2)(ii)(B)\]

c) Does not provide adequate procedures for correcting malfunctioning process equipment, air
pollution control techniques, or monitoring equipment as quickly as practicable.
\(63.342(f)(2)(ii)(C)\]

**Operation and Maintenance Plan:**

1) If actions taken by the permittee during periods of malfunction are inconsistent with the procedures
specified in the operation and maintenance plan required by \(63.342(f)(3)(i)\), the permittee shall
record the actions taken for that event and shall report by phone such actions within 2 working days
after commencing actions inconsistent with the plan. This report shall be followed by a letter within
7 working days after the end of the event, unless the owner or operator makes alternative reporting
arrangements, in advance, with the director. \(63.342(f)(3)(iv)\]

2) The permittee shall keep the written operation and maintenance plan, Attachment C, on record to be
made available for inspection, upon request, by the director for the life of the affected source or until
the source is no longer subject to the provisions of this subpart. In addition, if the operation and
maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the
operation and maintenance plan on record to be made available for inspection, upon request, by the
director for a period of 5 years after each revision to the plan. \(63.342(f)(3)(v)\]
3) To satisfy the requirements of §63.342(f)(3), the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of §63.342. [§63.342(f)(3)(vi)]

Monitoring and Testing Requirements:

1) The permittee shall monitor the surface tension of the anodizing bath. Operation of the chromic acid anodizing tank at a surface tension greater than the value established during the performance test, or greater than 40 dyne/cm, as measured by a stalagmometer, or 33 dyne/cm, as measured by a tensiometer, shall constitute noncompliance with the standards. The surface tension shall be monitored according to the following schedule: [§63.343(c)(5)(ii)]

   a) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part. [§63.343(c)(5)(ii)(A)]

   b) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation. [§63.343(c)(5)(ii)(B)]

   c) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in §63.343(c)(5)(ii)(B). For example, if the permittee had been monitoring an affected source once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation. [§63.343(c)(5)(ii)(C)]

2) Once a bath solution is drained from the chromic acid anodizing tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of paragraphs (c)(5)(ii) (B) and (C) of this section. [§63.343(c)(5)(iii)]

3) The surface tension of anodizing bath shall be measured using Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks used at Decorative Chromium Electroplating and Anodizing Facilities," appendix A of this part. This method should also be followed when wetting agent type or combination wetting agent/foam blanket type fume suppressants are used to control chromium emissions from a hard chromium electroplating tank and surface tension measurement is conducted to demonstrate continuous compliance. [§63.344(d)(3)]

Recordkeeping:

1) The permittee shall maintained all records for a period of 5 years in accordance with §63.10(b)(1). [§63.346(c)]

2) The permittee shall maintain the following records: [§63.346(b)]

   a) Inspection records for the monitoring equipment, to document that the inspection and maintenance required by the work practice standards of §63.342(f). The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description
of the working condition of the device during the inspection, and any actions taken to correct
deficiencies found during the inspection. [§63.346(b)(1)]

b) Records of all maintenance performed on the affected source, and monitoring equipment;
[§63.346(b)(2)]

c) Records of the occurrence, duration, and cause (if known) of each malfunction of process, and
monitoring equipment; [§63.346(b)(3)]

d) Records of actions taken during periods of malfunction when such actions are inconsistent with
the operation and maintenance plan; [§63.346(b)(4)]

e) Other records, which may take the form of checklists, necessary to demonstrate consistency with
the provisions of the operation and maintenance plan required by §63.342(f)(3); [§63.346(b)(5)]

f) Test reports documenting results of all performance tests; [§63.346(b)(6)]

g) All measurements as may be necessary to determine the conditions of performance tests,
including measurements necessary to determine compliance with the special compliance
procedures of §63.344(e); [§63.346(b)(7)]

h) Records of monitoring data required by §63.343(c) that are used to demonstrate compliance with
the standard including the date and time the data are collected; [§63.346(b)(8)]

i) The specific identification (i.e., the date and time of commencement and completion) of each
period of excess emissions, as indicated by monitoring data, that occurs during malfunction of
the process, add-on air pollution control, or monitoring equipment; [§63.346(b)(9)]

j) The specific identification (i.e., the date and time of commencement and completion) of each
period of excess emissions, as indicated by monitoring data, that occurs during periods other than
malfunction of the process, or monitoring equipment; [§63.346(b)(10)]

k) The total process operating time of the affected source during the reporting period;
[§63.346(b)(11)]

l) Any information demonstrating whether a source is meeting the requirements for a waiver of
recordkeeping or reporting requirements, if the source has been granted a waiver under
§63.10(f); and [§63.346(b)(15)]

m) All documentation supporting the notifications and reports required by §63.9, §63.10, and
§63.347. [§63.346(b)(16)]

n) For sources using fume suppressants to comply with the standards, records of the date and time
that fume suppressants are added to the electroplating bath. [§63.346(b)(13)]

**Reporting:**

1) The permittee shall fulfill all reporting requirements outlined in §63.347 and in the General
Provisions to 40 CFR Part 63, according to the applicability of subpart A as identified in Table 1 of
Subpart N. These reports shall be made to the director. [§63.347(a)]

a) Reports required by subpart A of Part 63 and §63.347 may be sent by U.S. mail, fax, or by
another courier. [§63.347(a)(1)]

i) Submittals sent by U.S. mail shall be postmarked on or before the specified date.
[§63.347(a)(1)(i)]

ii) Submittals sent by other methods shall be received by the director on or before the specified
date. [§63.347(a)(1)(ii)]

b) The permittee may submit reports on electronic media. [§63.347(a)(2)]

2) **Notification of performance test.**

a) The permittee shall notify the director in writing of the permittee's intention to conduct a
performance test at least 60 calendar days before the test is scheduled to begin to allow the
director to have an observer present during the test. Observation of the performance test by the
director is optional. [§63.347(d)(1)]
b) In the event the permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) apply. [§63.347(d)(2)]

3) Notification of compliance status.
   a) The permittee shall submit to the director a notification of compliance status, signed by the responsible official (as defined in §63.2) who shall certify its accuracy, attesting to whether the affected source has complied with this subpart. The notification of compliance status shall be submitted to the Air Pollution Control Program. The notification shall list for each affected source: [§63.347(e)(2)]
      i) The applicable emission limitation and the methods that were used to determine compliance with this limitation; [§63.347(e)(2)(i)]
      ii) If a performance test is required by this subpart, the test report documenting the results of the performance test, which contains the elements required by §63.344(a), including measurements and calculations to support the special compliance provisions of §63.344(e) if these are being followed; [§63.347(e)(2)(ii)]
      iii) For each monitored parameter for which a compliant value is to be established under §63.343(c), the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit; [§63.347(e)(2)(iv)]
      iv) The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements, if methods differ from those identified in this subpart; [§63.347(e)(2)(v)]
      v) A description of the air pollution control technique for each emission point; [§63.347(e)(2)(vi)]
      vi) A statement that the permittee has completed and has on file the operation and maintenance plan as required by the work practice standards in §63.342(f); [§63.347(e)(2)(vii)]
      vii) If the permittee is determining facility size based on actual cumulative rectifier capacity in accordance with §63.342(c)(2), records to support that the facility is small. For existing sources, records from any 12-month period preceding the compliance date shall be used or a description of how operations will change to meet a small designation shall be provided. For new sources, records of projected rectifier capacity for the first 12-month period of tank operation shall be used; [§63.347(e)(2)(viii)]
      viii) A statement by the permittee as to whether the source has complied with the provisions of this subpart. [§63.347(e)(2)(ix)]
   b) The notification of compliance status shall be submitted to the director no later than 30 days after the compliance date specified in §63.343(a). [§63.347(e)(4)]

4) Reports of performance test results.
   a) The permittee shall report performance test results to the Air Pollution Control Program. [§63.347(f)(1)]
   b) Reports of performance test results shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status required by §63.347(e). (§63.347(f)(2))

5) Ongoing compliance status reports for area sources.
   a) The requirements of this paragraph do not alleviate affected area sources from complying with the requirements of State or Federal operating permit programs under 40 CFR part 71. (§63.347(h))
   i) The permittee shall prepare a summary report to document the ongoing compliance status of the affected source. The report shall contain the information identified in §63.347(g)(3), shall
be completed annually and retained on site, and made available to the director upon request. The report shall be completed annually except as provided in §63.347(h)(2). [§63.347(h)(1)]

ii) **Reports of exceedances.** If both of the following conditions are met, semiannual reports shall be prepared and submitted to the director: [§63.347(h)(2)(i)]

1. The total duration of excess emissions (as indicated by the monitoring data collected by the permittee in accordance with §63.343(c)) is 1 percent or greater of the total operating time for the reporting period; and [§63.347(h)(2)(i)(A)]
2. The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time. [§63.347(h)(2)(i)(B)]

iii) Once the permittee reports an exceedance as defined in §63.347(h)(2)(i), ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under §63.347(h)(3) is approved. [§63.347(h)(2)(ii)]

iv) The director may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source. [§63.347(h)(2)(iii)]

6) **Request to reduce frequency of ongoing compliance status reports for area sources.**

   a) If the permittee is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report onsite if all of the following conditions are met: [§63.347(h)(3)(i)]

i) For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit; [§63.347(h)(3)(i)(A)]

ii) The permittee continues to comply with all applicable recordkeeping and monitoring requirements of subpart A of Part 63 and this subpart; and [§63.347(h)(3)(i)(B)]

iii) The director does not object to a reduced reporting frequency for the affected source, as provided in §63.347(h)(3)(ii) and (iii). [§63.347(h)(3)(i)(C)]

b) The frequency of submitting ongoing compliance status reports may be reduced only after the owner or operator notifies the director in writing of his or her intention to make such a change, and the director does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the director may review information concerning the source's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the source's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. Such information may be used by the director to make a judgement about the source's potential for noncompliance in the future. If the director disapproves the permittee's request to reduce reporting frequency, the director will notify the permittee in writing within 45 days after receiving notice of the permittee's intention. The notification from the director to the permittee will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. [§63.347(h)(3)(ii)]

c) As soon as the monitoring data required by §63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for
another full year, the permittee may again request approval from the director to reduce the reporting frequency as allowed by §63.347 (h)(3). [§63.347(h)(3)(iii)]

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<th>Emission Unit</th>
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<td>Five (5) Paint Booths</td>
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**PERMIT CONDITION EP07 - 001**

10 CSR 10-5.295 Control of Emissions From Aerospace Manufacture and Rework Facilities

10 CSR 10-6.060 Construction Permits Required

Construction Permit 122001-009, Issued November 29, 2001

Construction Permit 052005-028, Issued May 27, 2005

**Emission Limitation:**

1) The permittee shall not cause, permit or allow the emissions of volatile organic compounds (VOC) from the coating of aerospace vehicles or components to exceed:

   a) 2.9 pounds per gallon (350 grams per liter) of coating, excluding water and exempt solvents, delivered to a coating applicator that applies primers. For general aviation rework facilities the VOC limitation shall be 4.5 pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator that applies primers;

   b) 3.5 pounds per gallon (420 grams per liter) of coating, excluding water and exempt solvents, delivered to a coating applicator that applies topcoats (including self-priming topcoats). For general aviation rework facilities, the VOC limit shall be 4.5 pounds per gallon (540 grams per liter) of coating, excluding water and exempt solvents, delivered to a coating applicator that applies topcoats including self-priming topcoats;

   c) The VOC content limits listed in Table 1 of 10 CSR 10-5.295, expressed in pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator that applies specialty coatings;

2) The requirements for primers, topcoats, specialty coatings, and chemical milling maskants specified in 10 CSR 10-5.295(3)(A) do not apply to the use of low-volume coatings in these categories for which the rolling 12-month total of each separate formulation used by the permittee does not exceed 50 gallons, and the combined rolling 12-month total of all such primers, topcoats, specialty coatings and chemical milling maskants used does not exceed 200 gallons. Coatings exempted under 10 CSR 10-5.295(3)(1) are not included in the 50 and 200 gallon limits.

**Operational Limitation/Equipment Specifications:**

1) The emission limitations in 10 CSR 10-5.295(3)(A) shall be achieved by

   a) The application of low solvent coating technology where each and every coating meets the specified applicable limitation expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents stated in 10 CSR 10-5.295(3)(A);

   b) The application of low solvent coating technology where the monthly volume-weighted average VOC content of each specified coating type meets the specified applicable limitation expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, stated in IO CSR 10-5.295(3)(A); averaging is not allowed for specialty coatings and averaging is not allowed
between primers, topcoats (including self-priming topcoats), Type I milling maskants, and Type II milling maskants or any combination of the above coating categories; or

c) Control equipment, including but not limited to incineration, carbon adsorption and condensation, with a capture system approved by the director, provided that the permittee demonstrates, in accordance with 10 CSR 10-5.295(5)(C), that the control system has a VOC reduction efficiency of 81% or greater.

2) The permittee shall apply all non-exempt primers and topcoats using one or more of the application techniques specified below:
   a) Flow/curtain application;
   b) Dip coat application;
   c) Roll coating;
   d) Brush coating;
   e) Cotton-tipped swab application;
   f) Electrodeposition (dip) coating;
   g) High volume low pressure (HVLP) spraying;
   h) Electrostatic spray application; or
   i) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined by the director.

3) The permittee shall ensure that all application devices used to apply primers and topcoats (including self-priming topcoats) are operated according to company procedures, local specified operating procedures, and/or the manufacturer’s specifications, whichever is most stringent, at all times. Equipment modified by the permittee shall maintain a transfer efficiency equivalent to HVLP or electrostatic spray application techniques.

4) The permittee shall comply with the following housekeeping requirements for any affected cleaning operation, unless the cleaning solvent used is an aqueous cleaning solvent, low vapor pressure hydrocarbon-based cleaning solvent, or contains less than 1% VOC by weight:
   a) Solvent-laden cloth, paper, or any other absorbent applicators used for cleaning shall be placed in bags or other closed containers upon completing their use. These bags and containers must be kept closed at all times except when depositing or removing these materials from the container. The bags and containers used must be of such a design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement;
   b) All fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations shall be stored in closed containers; and
   c) The handling and transfer or cleaning solvent to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh spent cleaning solvents shall be conducted in such a manner that spills are minimized.

5) Hand-Wipe Cleaning: - The permittee shall comply with one of the following:
   a) Utilize cleaning solvent solutions that are classified as an aqueous cleaning solvent and/or a low vapor pressure hydrocarbon based cleaning solvent; or
   b) Utilize cleaning solvent solutions that have a composite vapor pressure of 45 mmHg or less at 20 degrees Celsius (°C)

6) The permittee shall clean all spray guns used in the application of primers, topcoats (including self-priming topcoats), and specialty coatings utilizing one or more of the following techniques:
   a) Enclosed systems: - Spray guns shall be cleaned in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing cleaning solvent through the gun. If leaks in the system are found, repairs shall be made as soon as
practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued;

b) Nonatomized cleaning: - Spray guns shall be cleaned by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The cleaning solvent from the spray gun shall be directed into a vat, drum, or other waste container that is closed when not in use;

c) Disassembly spray gun cleaning: - Spray guns shall be cleaned by disassembling and cleaning the components by hand in a vat, which shall remained closed during the soaking period and when not inserting or removing components; and

d) Atomizing cleaning: - Spray guns shall be cleaned by forcing the cleaning solvent through the gun and directing the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

7) Flush Cleaning Operation: - The permittee shall empty the used cleaning solvents each time aerospace parts or assemblies, or components of a coating unit with the exception of spray guns are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control approved by the director. Aqueous, semi-aqueous, and low vapor pressure hydrocarbon based solvent materials are exempt from these requirements.

Test Methods:
1) The permittee shall determine compliance for coatings which are not waterborne (water-reducible), determine the VOC content of each formulation less water and less exempt solvents as applied using manufacturer's supplied data or Method 24 of 40 CFR Part 60, Appendix A. If there is a discrepancy between the manufacturer's formulation data and the results of the Method 24 analysis, compliance shall be based on the results from the Method 24 analysis. For waterborne (water reducible) coatings, manufacturer's supplied data alone can be used to determine the VOC content of each formulation.

2) The permittee shall determine compliance for cleaning solvents using the following:
   a) For aqueous and semi-aqueous cleaning solvents manufacturers' supplied data shall be used to determine the water content; or
   b) For hand-wipe cleaning solvents required in 10 CSR 10-5.295(3)(F), manufacturers' supplied data or standard engineering reference text or other equivalent methods shall be sued to determine the vapor pressure or VOC composite vapor pressure for blended cleaning solvents.

3) The permittee electing to demonstrate compliance with 10 CSR 10-5.295 by use of a control equipment meeting the requirements of 10 CSR 10-5.295(3)(B)3., shall demonstrate the required capture efficiency in accordance with EPA Methods 18, 25, and/or 25A in 40 CPR 60, Appendix A.

Recordkeeping:
1) Coatings: The permittee shall:
   a) Maintain a current list of coatings in use with category and VOC content as applied;
   b) Record each coating volume usage on a monthly basis; and
   c) Maintain records of monthly volume-weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating averaging under 10 CSR 10-5.295(3)(B)2.

2) Cleaning Solvents: The permittee shall:
   a) Maintain a list of materials with corresponding water contents for aqueous and semi-aqueous hand-wipe cleaning solvents;
b) Maintain a current list of cleaning solvents in use with their respective vapor pressure or, for blended solvents, VOC composite vapor pressure for all vapor pressure compliant hand-wipe cleaning solvents. This list shall include the monthly amount of each applicable solvent used; and

c) Maintain a current list of exempt hand-wipe cleaning process for all cleaning solvents with a vapor pressure greater than 45 mmHg used in exempt hand-wipe cleaning operations. This list shall include the monthly amount of each applicable solvent used.

3) All records must be kept on-site for a period of five years and made available to the Department upon request.

**Reporting:**
The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as required by 10 CSR 10-6.065(5)(C)1.

**PERMIT CONDITION EP07 - 002**

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

**General Requirements:** [§63.11173]

1) The surface coating operations must meet the requirements in paragraphs (e)(1) through (e)(5) of 63.11173 (listed below). [§63.11173(e)]

   a) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of §63.11173. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of §63.11173. [§63.11173(e)(1)]

   b) All spray-applied coatings must be applied in a spray booth that meets the requirements of paragraphs (e)(2)(i) and (e)(2)(iii) of this section §63.11173. [§63.11173(e)(2)]

   i) All spray booths and preparation stations must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see §63.14 of subpart A of Part 63). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications. [§63.11173(e)(2)(i)]
ii) Spray booths and preparation stations that are used to coat miscellaneous parts and products must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process. [§63.11173(e)(2)(iii)]

c) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the director. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District’s “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see §63.14 of subpart A of Part 63). The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.). [§63.11173(e)(3)]

d) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [§63.11173(e)(4)]

e) As provided in §63.6(g), the U.S. Environmental Protection Agency, may choose to grant the permittee permission to use an alternative to the emission standards in this section after the permittee has requested approval to do so according to §63.6(g)(2). [§63.11173(e)(5)]

2) The permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph §63.11173(e)(1). The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) §63.11173 listed below. [§63.11173(f)]

a) A list of all current personnel by name and job description who are required to be trained; §63.11173(f)(2)

b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of §63.11173 listed below. [§63.11173(f)(2)]

i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. [§63.11173(f)(2)(i)]

ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. [§63.11173(f)(2)(ii)]
iii) Routine spray booth and filter maintenance, including filter selection and installation. 

[§63.11173(f)(2)(iii)]

iv) Environmental compliance with the requirements of this subpart. [§63.11173(f)(2)(iv)]

c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. If the permittee can show by documentation or certification that a painter’s work experience and/or training has resulted in training equivalent to the training required in §63.11173(f)(2) are not required to provide the initial training required by that paragraph to these painters. [§63.11173(f)(3)]

3) As required by §63.11173(e)(1), all new and existing personnel at Sullivan Precision Metal Finishing, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in §63.11173(f)(2) satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. [§63.11173(g)(2)]

4) Training and certification of all new and existing personnel at Sullivan Precision Metal Finishing, including contract personnel will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of §63.11173 and be re-certified every five years. [§63.11173(g)(3)]

5) The permittee shall comply with the General Provisions to 40 CFR Part 63 Subpart A, according to the applicability of 40 CFR Part 63 Subpart A as identified in Table 1 of 40 CFR Part 63 Subpart HHHHHH. [§63.11174(a)]

Recordkeeping:
Pursuant to §63.11177, the permittee shall keep records of:

1) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed. [§63.11177(a)]

2) Documentation of the filter efficiency of the spray booths exhaust filter material, according to the procedure in §63.11173(e)(3)(i). [§63.11177(b)]

3) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the director to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4). [§63.11177(c)]

4) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176. [§63.11177(d)]

5) Any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. [§63.11177(g)]

6) Any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report. [§63.11177(h)]

7) The permittee must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. [§63.11178]
**Reporting:**

1) Notification of Compliance Status:
   The permittee shall submit notification of compliance status in accordance with §63.11175(b).

2) Annual Notification of Changes Report:
   The permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in §63.11176 (a)(1) through (2).  
   
   a) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.  
   b) The name, title, address, telephone, e-mail address (if available) and signature of the permittee, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.  

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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 on the date of permit issuance. 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 make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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 10-6.110 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 submit full EIQ’s per the schedule in the rule. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation’s emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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.

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.

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

This is a State Only permit requirement.
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.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited
No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.
**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations**
(Rescinded on February 11, 1979, Contained in State Implementation Plan)
No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

**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.

Permit Duration
10 CSR 10-6.065, §(4)(C)1, §(5)(C)1.B, §(4)(E)2.C
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.

General Record Keeping and Reporting Requirements
10 CSR 10-6.065, §(4)(C)1 and §(5)(C)1.C
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 available within a reasonable period of time 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 or AirComplianceReporting@dnr.mo.gov.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
   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 (5)(C)7 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 annual report shall be reported on the schedule specified in this permit.

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.

Risk Management Plan Under Section 112(r)
10 CSR 10-6.065 §(4)(C)1 and §(5)(C)1.D
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.

General Requirements
10 CSR 10-6.065(4)(C)1.A
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 under this rule.

6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(5) and enforcement action for operating without a valid part 70 operating permit.
Reasonably Anticipated Operating Scenarios
10 CSR 10-6.065(4)(C)1.C
There are no reasonably anticipated operating scenarios.

Compliance Requirements
10 CSR 10-6.065, §(4)(B)4; §(4)(C)1, §(5)(C)3.B; and §(5)(C)3.D; and §(4)(C)3 and §(5)(C)3.E.(I) – (III) and (V) – (VI)
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 the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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.
Emergency Provisions

10 CSR 10-6.065, §(4)(C)1 and §(5)(C)7

1) An emergency or upset as defined in 10 CSR 10-6.065(5)(C)7 shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Off-Permit Changes

10 CSR 10-6.065(4)(C)5

1) Except as noted below, the permittee may make any change in its permitted installation’s operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   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 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; and
   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.

Responsible Official

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

The application utilized in the preparation of this permit was signed by Roy E. Smith, Environmental Health and Safety Manager. On June 30, 2015, the Air Pollution Control Program was informed that William Huggins, Jr., President is now the responsible official. 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.

Reopening-Permit for Cause
10 CSR 10-6.065 §(4)(E)4 and §(5)(E)6.A(III)(a)-(c)
This permit may be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) 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,
2) 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,
3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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 A

Facility-Wide VOC Tracking Record

This record keeping sheet or an equivalent sheet may be used to meet the record keeping requirements for Permit Condition PW001.

This sheet covers the month of _________ in the year ________

<table>
<thead>
<tr>
<th>Material Used²</th>
<th>Amount of Material Used Including Units</th>
<th>Density³ (lbs/gal)</th>
<th>VOC Content⁴ (Weight %)</th>
<th>Monthly VOC Emission⁵ (tons)</th>
</tr>
</thead>
<tbody>
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</tr>
<tr>
<td>Natural Gas Combustion Sources</td>
<td>Monthly Usage (MMscf)</td>
<td>VOC Emission Factor⁶ (lb/MMscf)</td>
<td>Monthly VOC Emissions⁷ (tons)</td>
<td>5.5</td>
</tr>
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</tbody>
</table>

Plantwide Monthly VOC Emissions (tons)⁸;

Plantwide 12-Month Rolling Total VOC Emissions (tons)⁹;

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² List all materials containing VOC used by EP07 (Paint Booths).
³ As listed on the SDS for the material. If the specific gravity (s.g.) is provided instead, Density (lb/gal) = s.g. x 8.33
⁴ As listed on the SDS for the material. If a range of values is provided, use the highest value in the range to demonstrate compliance.
⁵ Monthly VOC Emissions (tons) = Monthly Usage (gallons) x Density (lb/gal) x VOC Content (wt %) x 0.0005 (ton/lb).
⁶ VOC Emission Factor obtained from AP-42 Table 1.4-2.
⁷ Monthly VOC Emissions (tons) = Monthly Usage (MMscf) x VOC Emission Factor (lb/MMscf) x 0.0005 (ton/lb).
⁹ Plantwide 12-Month Rolling Total VOC Emissions (tons) = The sum of the 12 most recent Plantwide Monthly VOC Emissions (tons) + the sum of all start-up, shutdown, and malfunction VOC emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement Section during the most recent 12 month period. Plantwide 12-Month Rolling Total VOC Emissions of less than 100.0 tons per year indicates compliance with Permit Condition PW001.
## Attachment B

Facility-Wide Individual HAP and Combined HAPs Tracking Record

This record keeping sheet or an equivalent sheet may be used to meet the record keeping requirements for Permit Condition PW001

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Material Used (Name, Type)</th>
<th>Amount Used (gal)</th>
<th>Density (lb/gal)</th>
<th>Ind. HAP Name: CAS No.</th>
<th>Ind. HAP Name: CAS No</th>
<th>Ind. HAP Name: CAS No</th>
<th>Combined HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>(Wt %)</td>
<td>(Wt %)</td>
<td>(Wt %)</td>
<td>(Wt %)</td>
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<tr>
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<td></td>
<td></td>
<td></td>
<td>Emissions¹ (tons)</td>
<td>Emissions¹ (tons)</td>
<td>Emissions¹ (tons)</td>
<td>Emissions² (tons)</td>
</tr>
</tbody>
</table>

1 Monthly Emissions²: Monthly Emissions²: Monthly Emissions²: Monthly Emissions²:

2 12-Month Rolling Total Emissions (tons) = This month’s Monthly Emissions (tons) + the previous 11 month’s Monthly Emissions (tons).

3 The permittee is in compliance if 12-Month Rolling Total emissions of each Individual HAP are less than 10.0 tons per year and 12-Month Rolling Total Combined HAP Emissions are less than 25.0 tons per year.

### Notes:

1. Ind. HAP Emissions = Amount Used (gal) x Density (lb/gal) x Ind. HAP Content (wt %) x 0.0005 (ton/lb).
2. Combined HAP Emissions = Amount Used (gal) x Density (lb/gal) x Combined HAP Content (wt %) x 0.0005 (ton/lb).
3. Monthly Emissions (tons) = The sum of Emissions (tons) for each emissions source.
4. 12-Month Rolling Total Emissions (tons) = This month’s Monthly Emissions (tons) + the previous 11 month’s Monthly Emissions (tons).
Attachment C

40 CFR Part 63 Subpart N – Operation and Maintenance Plan

Process Tank Solution Analysis Procedure

Title: Type 1 Chromic Acid Anodize

Rev: D

Issue Date: 6/9/06

1.0 SCOPE

1.1 PROCESS DESCRIPTION

This process tank solution procedure covers total volume make-up, testing, and maintenance of analysis of Type 1 Chromic Acid Anodize.

2.0 COMPOSITION

2.1 SOLUTION

Chromic Acid

2.2 SUPPLIER

Harco, St. Louis, MO
HCl Chemtech Distribution, St. Louis, MO

2.3 CONCENTRATION

Aluminum - Al2O3 - 10g/L maximum
Chlorides - NaCl - 200 ppm Maximum
Sulfates - H2SO4 - 500 ppm Maximum
Free Chromic Acid - 5.4 - 7.0 oz./Gal.
Total Chromic Acid - 5.4 - 14.4 oz./Gal.
pH 0.9 Maximum
Surface Tension - 25-35 dynes/cm

2.4 TEMPERATURE

95°F +/− 5°F

2.5 VOLTAGE

22 +/− 2 Volts
Or as required by the customer contract or specification.

2.6 IMMERSION TIME

As applicable per customer specification.
Attachment C (continued) 40 CFR Part 63 Subpart N – Operation and Maintenance Plan

**PROCESS TANK SOLUTION ANALYSIS PROCEDURE**

**TITLE:** TYPE 1 CHROMIC ACID ANODIZE

**TANK # 16.08/Tank # 32.16**

<table>
<thead>
<tr>
<th>PROCEDURE</th>
<th>DATE</th>
<th>ISSUE DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.0 FACILITIES PROCEDURE</td>
<td>HPP 4.10-02-32</td>
<td>6/9/06</td>
</tr>
<tr>
<td>3.1 MAKE-UP</td>
<td>Rev : B</td>
<td></td>
</tr>
</tbody>
</table>

Note: 44 lbs of Chromic Acid per 100 Gals. of solution
2.5 gallons of Fumetrol 140 per 1,000 gallons of solution

A. Fill tank ½ to ¾ full with Deionized water.
B. With air agitation slowly add the required amount of Chromic Acid.
C. Add balance of deionized water to fill to working level
D. Heat to operation temperature.

<table>
<thead>
<tr>
<th>LABORATORY ANALYSIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 CHROMIC ACID AND ALUMINA CONCENTRATION</td>
</tr>
</tbody>
</table>

**EQUIPMENT NEEDED**

A. (1) 250 ml Beaker
B. (1) 20-ml Volumetric Pipette
C. (2) Stir Bars and a Magnetic Stirrer
D. (1) Burette
E. (1) pH Meter

**CHEMICALS REQUIRED**

A. 0.500 N Sodium Hydroxide Volumetric Standard Solution
B. pH 7.0 Standard Buffer Solution
C. 4.0 Standard Buffer Solution

**PROCEDURE**

A. Pipette a 20-ml sample of the bath into a 250-ml beaker and dilute to 100 ml with deionized water.
B. Add a stir bar and place on the magnetic stirrer.
C. Calibrate the pH meter with 7.0 Buffer and 4.0 Buffer.
D. While mixing slowly, insert the pH probe and begin titrating with the 0.5 N Sodium Hydroxide solution.
E. When the pH meter reads 3.2, record the ml of sodium hydroxide titrated. This will be A.
F. Continue titrating until a pH reading of 4.8 is observed on the meter. Record this value as B.

**CALCULATIONS**

\[ \text{N}(\text{A})(0.668) = \text{Oz.}/\text{Gal. Free Chromic Acid} \]
\[ \text{N}(\text{B})(0.668) = \text{Oz.}/\text{Gal. Total Chromic Acid} \]
\[ \text{N}(\text{B} - \text{A})(0.86) = \text{G/L Alumina} \]

<table>
<thead>
<tr>
<th>EQUIPMENT NEEDED FOR GRAVIMETRIC SULFATE ANALYSIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.2.1</td>
</tr>
</tbody>
</table>

A. (1) 250 ml Beaker
B. 400 ml Beaker
C. 25 Pipette
D. Hot Plate
E. Gooch Crucibles
F. Filter paper or (3) Whatman No. 542 Filter 2.1 cm circles.
G. Desiccator
H. Muffle Furnace capable of reaching a minimum temperature of 800 °C to 1000 °C. (1470°F to 1830°F)
Attachment C (continued) 40 CFR Part 63 Subpart N – Operation and Maintenance Plan

### PROCESS TANK SOLUTION ANALYSIS PROCEDURE

**TITLE:** TYPE 1 CHROMIC ACID ANODIZE  
**TANK #** 16.08/Tank # 32.16

**4.2.2 CHEMICALS REQUIRED**

A. REDUCING SOLUTION (1 Liter)  
1) 220 mL Hydrochloric Acid  
2) 650 mL Glacial Acetic Acid  
3) 130 mL Ethyl Alcohol  
B. 10% Barium Chloride Solution

**4.2.3 PROCEDURE**

A. Pipette 25 mL of sample into a 400 mL beaker.  
B. Add 250 mL of Reducing Solution  
C. Heat on Hot Plate to boiling and continue boiling until reduced to a volume of approximately 70 mL.  
D. Add 250 mL of hot distilled water and 10 mL of 10% Barium Chloride Solution.  
E. Cover with a Watch Glass and let stand for 24 hours on a hot plate at a low temperature.  
The solution must not be allowed to boil away.

**4.2.4 PREPARE 3 GOOCH CRUCIBLES**

Place a Whatman No. 542 2.1 cm. Glass Fiber Filter Circle in the bottom of the Gooch crucibles and insert the crucible in the filter flask holder. Then run about 25 mL of deionized or distilled water through the crucible. Pack the filter so that there are no holes around the edge of the crucible.  
A. Heat in a Muffle Furnace at 150 °C for two hours. Remove from furnace immediately placing the crucibles in a Desiccators.  
B. Allow to cool for a minimum of one hour.  
C. Weigh and record the weight of the crucibles  
D. Repeat steps A through C until a constant weight is obtained.

**4.2.5 FILTRATION**

Using the filter flask slowly filter the supernatant liquid through the Gooch crucible. Pass most of the liquid through first, then add a small amount of deionized water or distilled water to wash the precipitate. Transfer all the precipitate quantitatively with the aid of a squirt bottle and a rubber policeman. The precipitate must be further washed with small amounts of hot water after it is all transferred to the Gooch crucible.

**4.2.6 DRYING**

A. Heat in a Muffle Furnace at 800 °C for a minimum of one hour.  
B. Remove from the furnace and transfer the crucibles to a Desiccator.  
C. Allow to cool for a minimum of 30 minutes.  
D. Weigh the crucibles and record the weights.  
E. Repeat Steps A through D until a constant weight is obtained.

**4.2.7 CALCULATIONS**

\[(\text{Final Weight} - \text{Initial Weight}) = \text{Weight of Barium Sulfate Precipitated in grams.}\]

\[
\text{Weight of Sulfate as Sulfuric Acid} = \frac{\text{Molecular Weight of Sulfuric Acid}}{\text{Molecular Weight of Barium Sulfate}} \times \text{Weight of Barium Sulfate}
\]

\[
(98.079/233.391)(\text{Weight of Barium Sulfate}) = \text{G/l Sulfate as Sulfuric Acid}
\]

\[
(\text{G/l Sulfate as Sulfuric Acid})(1000)/0.025 = \text{Mg/l Sulfate as Sulfuric Acid} = \text{ppm Sulfate as Sulfuric Acid}
\]
36

Attachment C (continued) 40 CFR Part 63 Subpart N – Operation and Maintenance Plan

4.3.1 CHLORIDE ANALYSIS – EQUIPMENT NEEDED
A. (1) 25 ml Volumetric pipette
B. (1) 400 ml Beaker
C. (1) Glass fiber filter disc (Or paper filter pulp)
D. (1) Drying Oven

4.3.2 CHEMICALS REQUIRED
A. 0.018 M Silver nitrate

4.3.3 PROCEDURE
A. Pipette a 25 ml sample of the bath into a 400 ml beaker
B. Dilute to 200 ml with deionized water and add 10 ml of Nitric Acid.
C. Heat to boiling, boil for 20 minutes, then cool.
D. Add 5 ml of 0.38N Silver Nitrate Solution; heat to boiling for 15 minutes.
E. Allow to stand for 5 to 6 hours at 140-176°F.
F. Filter through a Gooch crucible that has been cleaned and dried to a constant weight.
G. Wash the precipitate with three 5 to 10 ml portions of 3% Nitric acid.
H. Wash the precipitate three times with deionized water.
I. Oven dry at 110°C to a constant weight.

4.3.4 CALCULATIONS
(Wt. AgCl Precipitate Grams)(0.0163 = ppm Chlorides as NaCl

4.3.5 pH DETERMINATION – EQUIPMENT NEEDED
A. pH 4.0 +/- 0.02 Buffer Solution
B. pH 7.0 +/- 0.02 Buffer Solution
C. pH 2.0 +/- 0.02 Buffer Solution (Optional)

4.3.6 PROCEDURE
A. Standardize the pH meter at 7.0 pH units with the pH Buffer solution
B. Standardize the pH meter at 4.0 pH units, with the pH Buffer solution
C. If the pH meter is not equipped with automatic temperature correcting capabilities. Adjust the temperature of the bath to 25°C.
D. Insert the probe into the sample of the bath, allow it to equilibrate, and record the reading.

4.4.1 CONTINUITY TEST – (EMBREEAR ONLY)

4.4.2 CHEMICALS REQUIRED FOR CONTINUITY TEST
A. Copper Sulfate Pentahydrate (CuSO₄·5H₂O)
B. Hydrochloric Acid
Attachment C (continued) 40 CFR Part 63 Subpart N – Operation and Maintenance Plan

PROCESS TANK SOLUTION ANALYSIS PROCEDURE

TITLE: TYPE 1 CHROMIC ACID ANODIZE
TANK # 16.08/Tank # 32.16

HPP 4.10-02-32
Rev: D
Issue Date: 6/9/06

4.4.3 PROCEDURE

A. Anodize 3 - 3 inch by 3 inch 2024 T-3 Aluminum Test Panels
B. Prepare a Copper Sulfate solution by dissolving 20 grams of Copper Sulfate in 500 milliliters of water. Add 20 milliliters of concentrated Hydrochloric Acid and mix well. Quantitatively transfer to a 1 liter volumetric flask, dilute to the mark with deionized water and mix well.
C. Clean the surface of the panels, if necessary. Apply the solution by wetting the surface of the test panel. Wait 30 seconds and inspect for the appearance of black spots. If a black spot appears the coating contains a defect.

4.5 SURFACE TENSION TEST

4.5.1 PROCEDURE

A. DI Water Reference Sample
   1. Fill surface tension measuring device with DI water until level is below 2 on the inner cylinder’s marks.
   2. Record this value as A.
   3. With a pipette bulb draw water up the inner cylinder until it reaches the highest marking and observe.
   4. As soon as the level of liquid in the inner cylinder stops dropping, record this value as B.
   5. Repeat 3 times.

B. Tank Solution Sample
   1. On the analytical balance, weight 10mL of sample and record to the nearest 0.1mg to determine the solutions density.
   2. Then repeat the above procedure for the water reference sample 3 times and record A and B for the tank solution.

NOTE: Density and Surface Tension should be ran at 25°C

4.5.2 CALCULATIONS

Solutions Density (g/mL) = sample weight (g) / 10mL

Surface Tension:

\[ Y = \frac{1}{2} \times g \times r \times d \times h \]

Sullivan’s Latitude = 38 deg
\[ g = 979.995 \text{ cm/sec}^2 \]
\[ r = 0.25 \text{mm} = 0.025 \text{cm} \]
\[ d = \text{density of the liquid (g/cm}^3) \]
\[ h = \text{Inner cylinder level - Outer cylinder level} \]

4.6 TANK OPERATIONAL RUN TIME MONITORING

Laboratory personal shall record from the in-line electronic tracking device the number of hours that the tank was in use.
PROCESS TANK SOLUTION ANALYSIS PROCEDURE

**HPP 4.10-02-32**

**TITLE:** TYPE 1 CHROMIC ACID ANODIZE

**TANK # 16.08/Tank # 32.16**

**Rev:** D

**Issue Date:** 6/9/06

### 4.7 FREQUENCY OF ANALYSIS

The free chromic acid, total chromic, alumina concentrations and surface tension shall be determined a minimum of weekly. Also the number of operational hours that the tank was in use shall be recorded weekly. If at any point that the number of operational hours exceeds 40 per week, the lab shall test the surface tension every 40 hours that the tank is in operation. The Chloride and Sulfate analyses shall be run a minimum of monthly. If after 6 months the chloride and sulfate concentrations have not changed significantly the analyses frequency may be reduced to quarterly. If after one year of quarterly monitoring the chloride and sulfate concentrations still show no significant increases in concentration the monitoring period may be further reduced to semi-annually. Provided that no problem of obtaining acceptable coating weights is observed. If any problem of obtaining acceptable coating weights is observed, the monitoring shall return to monthly.

### 5.0 QUALITY REQUIREMENTS

#### 5.1 LABORATORY LOG

Calculation of analysis performed will be entered into Master Laboratory Log. Upon completion, evaluation to solution compliance is determined.

#### 5.2 SOLUTION NON-CONFORMANCE PROVISION

If solution is found to be out of compliance label tank “Out of Service” and follow procedure outlined in HPP 4.10-02-65

### 6.0 ASSOCIATED PROCEDURES

HPP 4.10-02-65 Process Tank Solution Change Order Procedure

**PROCEDURE AMMENDMENT RECORD**

<table>
<thead>
<tr>
<th>Revision</th>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>6/09/06</td>
<td>Reformatted procedure numbering for clarification. Para 4.6 modified frequency of Chloride and Sulfate analysis to monthly, reducing to quarterly then semi-annually based on historical data. Added Surface Tension specification in Para 2.3 Added Fumetrol to initial tank make-up in Para 3.1 Added Surface Tension procedure in Para 4.5 Added Surface Tension test frequency and Tank run time monitoring frequency in Para 4.5 Added Para 4.6 about Tank run time monitoring</td>
</tr>
</tbody>
</table>
STATEMENT OF BASIS

Voluntary Limitations
In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(4)(C)1.A.(VI), if these limitations are exceeded, the installation becomes subject to 10 CSR 10-6.065(5) and enforcement action for operating without a valid part 70 operating permit. It is the permittee’s responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Installation Description
Sullivan Precision Metal Finishing, located in Sullivan, Missouri, has been processing aluminum parts for the aerospace industry since 1978. Pre-fabricated aluminum parts are received from manufacturers. These parts, consisting mostly of helicopter and aircraft pieces, are treated at the facility. Some of the pieces are anodized and others are painted. The finished pieces are then shipped out to assembly plants.

Establishments involved in finishing metals, including chromium anodizing, have Standard Industrial Classification (SIC) number 3471 and a North American Industry Classification System (NAICS) number 332813.

Prefabricated aluminum, stainless steel and titanium parts are received from the manufacturers. The finishing processes include chrome anodizing, coating, etching, conversion coating, and grit blasting. The facility's equipment includes five paint booths, two chromic acid anodizing tanks, electric ovens and two natural gas-fired boilers. The paint booth emissions are controlled by dry filters and the chromi anodizing emissions are controlled by fume suppressants.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Potential Emissions (PTE)</th>
<th>Reported Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM₁₀)</td>
<td>3.76</td>
<td></td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM₂.₅)</td>
<td>3.76</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Sulfur Oxides (SO₂)</td>
<td>0.01</td>
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<tr>
<td>Nitrogen Oxides (NO₂)</td>
<td>4.29</td>
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</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>204.24</td>
<td>&lt;100</td>
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### Potential Emissions Reported (PTE)

<table>
<thead>
<tr>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>3.60</td>
<td>Not Applicable</td>
<td>0.04</td>
<td>0.00</td>
<td>1.06</td>
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<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>44.25</td>
<td>&lt;10/25</td>
<td>0.00</td>
<td>0.00</td>
<td>3.30</td>
</tr>
<tr>
<td>Hexavalent Chromium</td>
<td>0.0082</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
</tbody>
</table>

**Note:**
1. Unconditioned PTE - Represents the potential of the emission units, assuming continuous operation (8,760 hours per year) and are taken from Construction Permit 052005-028. The CO₂e PTE is from the Natural Gas Fired Boilers and Dryers.
2. Conditioned PTE – Represents the potential emissions based on federally enforceable emission limitations of VOC and HAPs of Permit Conditions PW001. These limits keep the potential to emit below major levels, thus allowing the facility to obtain this Intermediate Operating Permit.
4. Although the reported emissions include no values for Hazardous Air Pollutants, the installation did emit Hazardous Air Pollutants during the years 2013-2017. The HAPs emissions were reported as VOCs on Form 2T pages of the Emission Inventory Questionnaires in the applicable years.

### 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) Intermediate Operating Permit Renewal Application, received July 14, 2014;
2) Intermediate Operating Permit, Permit No. OP2009-033, Issued December 2, 2009;
3) 2014 Emissions Inventory Questionnaire, received April 13, 2015;
5) Construction Permit 1297-022;
6) Missouri Department of Natural Resources Air Pollution Control Program Revision Letter for Construction Permit 1297-022, Dated January 6, 1998;
7) Air Pollution Control Program Revision Letter for Construction Permit 1297-022, Dated January 27, 1998;
8) Construction Permit 122001-009;
9) Construction Permit 102004-003;
10) Construction Permit 052005-028; and
11) O&M Plan required by 40 CFR Part 63, Subpart N.

### 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.

This rule has not been included in the renewal application; however, it has been determined to be applicable to the installation and, therefore, has been included in this operating permit.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

1) 10 CSR 10-6.070 New Source Performance Standards
   This rule is not applicable because no New Source Performance Standards apply to this facility

2) 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds
   The two 0.5 MMBtu/hr Natural Gas Fired Boilers (EP05) use 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 is exempt from the requirements of this rule.

3) 10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating.
   This regulation does not apply to the boilers in this facility because they burn only natural gas and are exempt according to 10 CSR 10-6.405(1)(C).

4) 10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes
   This rule does not apply to the boilers because they burn fuel used for indirect heating which is exempted from this regulation per 10-6.400(1)(B)6. The paint booths are exempt per 10 CSR 10-6.400 (1)(B)14, because the paint booths have fabric filter control that is to be at least ninety-five (95%) efficient at controlling particulate overspray. According to Construction Permit 052005-028, the PM10 PTE from the installation of the chromic acid anodizing tank is 0.01149 tons per year or 0.0026 lb/hr. Therefore the chromic acid anodizing tank is exempt per 10 CSR 10-6.400(1)(B)12.

5) 40 CFR Part 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.
   The provisions of this subpart apply to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour).

   The boilers are not subject to the requirements of Subpart Db because their respective capacities are less than 100 MMBtu/hr.

6) 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
   This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).
The boilers are not subject to the requirements of Subpart De because their respective capacities are less than 100 MMBtu/hr.

**Construction Permit History**

The following revisions were made to construction permits for this installation:

1) Construction Permit 1297-022, Special Condition 1. Odors: Special Condition 1 in the original issued permit has been superseded by Special Condition 1. Odors in the amendment letter from the Missouri Department of Natural Resources Air Pollution Control Program, dated January 6, 1998, addressed to Mr. William Huggins. Specifically, the amendment letter corrects a reference to a CSR odor regulation. However, the corrected reference 10 CSR 10-5.160 pertaining to odors for Sullivan Precision Metal Finishing per the amendment has been rescinded in 2010 and therefore no longer applicable. Emission of odors for this facility is addressed per 10 CSR 10-6.165 Restriction of Emission of Orders.

2) Construction Permit 1297-022, pages 5-8: Pages 5 through 8 of the original permit have been superseded by pages 5 through 8 in the Missouri Department of Natural Resources Air Pollution Control Program letter dated January 27, 1998, addressed to Mr. William Huggins.

3) Construction Permit 1297-022, Applicable Requirements I.C. Fugitive Particulate Matter: Permit amendment letter dated January 27, 1998, lists Restriction of Emission of Visible Air Contaminants, 10 CSR 10-5.090 as the applicable requirement for fugitive particulate matter. 10 CSR 10-5.090 was rescinded May 30, 2000, and therefore no longer applicable. Fugitive particulate matter for this facility is addressed per 10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Precises of Origin.

4) Construction Permit 1297-022, Applicable Requirements II.A.1. Control of Emissions from Industrial Surface Coating Operations, 10 CSR 10-5.330: 10 CSR 10-5.330 is no longer applicable to this facility. As described in Construction Permit 122001-009, Sullivan Precision Metal Finishing has been treating and surface coating aerospace assembly components and was subject to 10 CSR 10-5.330, Control of Emissions from Industrial Surface Coating Operations. This regulation limits primers to 6.0 lb/gal VOCs and topcoat to 5.0 lb/gal VOCs. However, this regulation was amended on December 31, 2000. This amendment removed the restriction on aerospace surface coating operations. The rule file indicates that surface coatings of aerospace components are covered under 10 CSR 10-5.295 Control of Emissions from Aerospace Manufacturing and Rework Facilities. 10 CSR 10-5.295 has been incorporated into this permit as PERMIT CONDITION EP06-001.

5) Construction Permit 122001-009, Applicable Requirements I.B.1 Restriction of Emission of Odors, 10 CSR 10-3.090: Construction Permit 122001-009 incorrectly lists 10 CSR 10-3.090 as the applicable rule for Sullivan Precision Metal Finishing. 10 CSR 10-3.090 before it was rescinded on November 30, 2010 used to apply to facilities located in the outstate area of Missouri. The correct rule restricting the emission of odors from their facility is 10 CSR 10-6.165 Control of Odors in the Ambient Air.
6) Construction Permit 102004-003:
   This construction permit was issued to allow Sullivan Precision Metal Finishing to construct a new
   paint booth. The paint booth referenced by permit 102004-003 was not constructed; therefore, this
   construction permit and its requirements are not applicable.

7) Construction Permit 052005-028, GENERAL REQUIREMENTS, Restriction of Emission of Odors,
   10 CSR 10-3.090:
   Construction Permit 122001-009 incorrectly lists 10 CSR 10-3.090 as the applicable rule for
   Sullivan Precision Metal Finishing. 10 CSR 10-3.090 before it was rescinded on November 30, 2010
   used to apply to facilities located in the outstate area of Missouri. The correct rule restricting the
   emission of odors from their facility is 10 CSR 10-6.165 Control of Odors in the Ambient Air.

8) Construction Permit 052005-028, SPECIFIC REQUIREMENTS, Restriction of Emission of
   Particulate Matter From Industrial Processes, 10 CSR 10-6.400:
   As stated in Other Air Regulations Determined Not to Apply to the Operating Permit section above,
   10 CSR 10-6.400 is not applicable to this facility.

9) Construction Permit 052005-028, REVIEW SUMMARY, Emission Points:
   In construction permit 052005-028, the 16-foot and 32-foot chromic acid anodizing tanks are
   identified as EP-01 and EP-06 respectively. Based upon the 2007 EIQ, the owner has identified
   these emission points as a single emission point, EP-06.

   The facility dismantled and removed the 16-foot chromic acid anodizing tank identified as EU0030
   in the Intermediate Operating Permit, Permit No. OP2009-033, so the 16-foot chromic acid
   anodizing tank is not included in this permit.

New Source Performance Standards (NSPS) Applicability
   None.

Maximum Achievable Control Technology (MACT) Applicability
1) 40 CFR Part 63, Subpart N, National Emission Standards for Chromium Emissions From Hard and
   Decorative Chromium Electroplating and Chromium Anodizing Tanks:
   The Subpart N MACT standard applies to each chromium electroplating or chromium anodizing
   tank at facilities performing hard chromium electroplating, decorative chromium electroplating, or
   chromium anodizing.

   Sullivan Precision Metal Finishing operates one (1) chromium anodizing 32-foot tank for anodizing
   aluminum aircraft parts, therefore Subpart N is applicable to the 32-foot chromium anodizing tank.

2) 40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants:
   Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
   This rule applies to area sources that engage in spray application of coatings to a plastic and/or metal
   substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn),
   nickel (Ni), or cadmium (Cd).

   The facility operates five paint booths and the paints used at this facility do contain chromium
compounds. And also, the facility is one of the affected entities with the North American Industrial Classification System (NAICS) code 336413.


§63.11504(a)(1)(i) of this subpart states that this regulation applies to an electroplating facility other than chromium electroplating (i.e., non-chromium electroplating). SPMF is a chromium electroplating facility and is subject to 40 CFR part 63, subpart N. §63.11505(d)(1) also indicates this subpart does not apply to process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks This subpart does not apply to).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants

40 CFR Part 61 Subpart M—National Emission Standard for Asbestos, §61.145(a), Standard for demolition and renovation, applies to the installation. (see Section IV Core Permit Requirements)

Greenhouse Gas Emissions

Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 1281.90 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂e emissions were not included within this permit.

Other Regulatory Determinations

10 CSR 10-6.170 Restriction of PM to the Ambient Air Beyond the Premises of Origin and 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants are applicable to the installation, but were not applied within this permit. Although the installation is subject to this regulation, plantwide potential particulate emissions are 0.13 pound per hour (0.58 ton per year); therefore, no monitoring, recordkeeping, or reporting is required from the installation at this time.

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 Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).
Response to Public Comments

There were nine (9) comments received on January 26, 2016 from EPA Region 7. The comments are addressed in the order in which they appear within the letter and are quoted verbatim.

**Comment #1:** The installation description in an operating permit should provide sufficient information to allow for a complete and expeditious evaluation of the permit terms and conditions. The Installation Description in the Statement of Basis of the Intermediate State Permit to Operate for Sullivan Precision Metal Finishing (SPMF) lacks the pertinent information to allow for a determination as to whether or not the proposed operating permit conditions contain all applicable regulations. Additionally, the operating permit renewal application submitted by SPMF, in July 2014, provides very little helpful Installation Description information. As an example, the Statement of Basis indicates that both 40 CFR part 63, Subpart N and 40 CFR part 63, Subpart HHHHHH are applicable to SPMF. However, Subpart N includes several different standards; a variety of operation and maintenance practices and several housekeeping practices. These standards and practices are specific to certain designated type facilities, which are not currently identified in the Installation Description. Also, Subpart HHHHHH includes multiple items which are to be included in various affected sources with varying general compliance requirements which are not obvious due to a lack of Installation Description specifics. Finally, a 2011 inspection report indicates that SPMF has two (2) 5.231 MMBtu/hr natural gas fired boilers and the Installation Description indicates the two (2) boilers are 0.5 MMBtu/hr (as also indicated in SPMF renewal application). To add further confusion, construction permit CP 1297-022, issued December 17, 1997 to Huggins Metal Finishing, Inc., approved the installation of a 21 MMBtu/hr boiler. Yet, there is no discussion or description presented in the draft permit to explain these differences. Also, there is no discussion of the evolution of this facility from Huggins Metal Finishing, Inc. to Sullivan Precision Metal Finishing. Therefore, EPA strongly recommends MDNR-APCP enhance the specificity of the Installation Description to include a more thorough description of SPMF facilities and processes (including air pollution controls employed) to aid in MACT applicability verification and provide the facility ownership history.

**Response to Comment:**

- As stated in the Statement of Basis of this permit, the installation operates five paint booths and the paints used at this facility do contain chromium compounds. And also, the facility is one of the affected entities under 40 CFR part 63, Subpart HHHHHH with the North American Industrial Classification System (NAICS) code 336413.

  On June 25, 2015, we requested clarification on the applicability of Subpart HHHHHH since the paints used at facility do contain chromium compounds. And also, the facility is one of the potentially affected entities with the North American Industrial Classification System (NAICS) code 336413. The installation confirmed that aerospace primers containing chromium can be sprayed in the paint booths.

As recommended the Installation Description is enhanced and there is enough information in the installation description of SPMF and on the applicability of Subpart HHHHHH.
• Construction permit #1297-022, issued December 17, 1997 to Huggins Metal Finishing, Inc., approved the installation of a 21 MMBtu/hr boiler. However the boiler is no longer in operation.

• With respect to the two (2) boilers listed in the Emission Units Without Limitation Section; the March 22, 2019 inspection report also states the two natural gas-fired boilers have a heat put capacity of 5 MMBtu/hr. The error has been corrected.

Comment #2: Permit Condition PW001 establishes an emission limitation of less than 100 tons of volatile organic compounds (VOCs) from this installation in any consecutive 12-month period; and less than 10 tons individually or 25 tons combined of all hazardous air pollutants (HAPs) from this installation in any consecutive 12 month period. Additionally, PW001 approves the use of Attachment A (Facility-wide VOC Tracking Record); to accurately demonstrate compliance with the 100 ton per 12-month period VOC limit and approves the use of Attachment B (Facility-Wide Individual HAP and Combined HAPs Tracking Record) to accurately demonstrate compliance with the combined HAP and individual HAP 12-month consecutive period limit. However, Attachment A appears to account for only the VOC emissions associated with surface coating processes; and Attachment B appears to account for only the total and individual HAPs associated with surface coating processes. Therefore, PW001 fails to ensure that the VOC; the individual HAP; and the total combined HAP emissions, respectively, will be below the limits established in PW001. While the draft operating permit intends to restrict VOC and HAP below the individual limits, these limits are not enforceable as a practical matter.

To effectively limit SPMF’s VOC, individual HAP, and total HAP emissions as specified, the VOC, individual and total HAP emission limits of PW001 must apply at all times to all actual emission units, and all actual VOC, individual and total HAP emission units must be considered in determining compliance with the respective limits. The draft operating permit is unclear whether all actual VOC; individual HAP; and total HAP emissions must be considered in determining compliance with these limits. Attachments A and B would appear to capture the emissions associated with surface coating processes, however, there does not appear to be any tracking associated with the VOC emissions and HAP emissions from other sources such as insignificant sources and natural gas combustion.

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 of VOCs and HAPs, 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 (installation) must be included in calculating PTE for purposes of determining VOC and HAP 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.
EPA recommends MDNR-APCP revise PW001 in the Intermediate State Permit to Operate to ensure the source-wide VOCs; the source-wide total HAPs and individual HAP emission limits are enforceable. MDNR should clarify in the operating permit that the limits apply at all times to all actual source-wide VOC; total HAP and individual HAP emissions and that all actual VOC; total HAP and individual HAP emission units must be considered in determining compliance with those limits.

**Response to Comment:** The draft permit has been revised as requested.

**Comment #3:** Permit Condition PW002 incorporates a special condition from construction permit 1297-022. This special condition appears to be related to the issue of off-site nuisance odors from the release of hazardous air pollutants (HAPs) toluene, xylene and methyl ethyl ketone (MEK). As per the special condition, SPMP is to investigate material substitutions to reduce these nuisance odors and to report annually to MDNR. However, there is no discussion regarding the results and progress made to reduce or eliminate the HAP impact, which has occurred over the past eighteen (18) years. Additionally, nuisance odor control is Missouri-state only requirement and Permit Condition PW002 should be clearly identified as “State-Only.” In addition, EPA would recommend MDNR-APCP include a progress report as part of the Statement of Basis.

**Response to Comment:** Staff from the Department of Natural Resources conducted an inspection on March 15, 2019 of Sullivan Precision Metal Finishing. The inspection report states that the facility was found to be in compliance based upon the observations made at the time of the evaluation.

The facility was also inspected by EPA in 2011 and the report stated that the facility has submitted annual compliance certification as required and no violation of this permit condition was observed. During the inspection, the coatings, primers, topcoats and solvents were in sealed containers and labeled.

Permit Condition PW002 is identified as “State-Only” in this draft permit as requested.

Permit Condition PW002 clearly states that SPMF shall report the results of their research for methods to reduce the off-property concentrations of HAPs annually as part of their annual operating permit certification. Given the results of recent inspections, and the discussion here, the inclusion of a progress report as part of the Statement of Basis was not believed necessary.

**Comment #4:** Permit Condition EP06-001 attempts to incorporate applicable requirements from 40 CPR Part 63, Subpart N-National Emission Standards for Hazardous Air Pollutants for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (MACT N). Based on a review of the draft permit condition, it appears that SPMP is subject only to the Chromium Anodizing requirements and is relying on a wetting agent fume suppression (WAFS) to control emissions from EP06. Additionally, it appears that SPMP has accepted the regulatory specified surface tension limits for the WAFS in lieu of establishing site specific limits. However, the requirements detailed in the draft operating permit condition (EP06-001) may not include all of the regulatory requirements and also may include requirements which are not applicable or practically enforceable.
a. Emission Limitation 1) is not enforceable as a practical matter and is written as a statement of fact. Requirements of each operating permit condition must be practically enforceable and EPA's guidance on practical enforceability defines a practically enforceable permit condition as one which answers "who," "what," "where," "when," "how," and "how often."

b. Work Practice Standard 1) a), 1) b), 2), 3), 4), and 5) require the permittee to make changes to the operating and maintenance plan, yet there is no requirement in the permit condition for the permittee to prepare an operating and maintenance plan and nothing that shows what the plan contents must include.

c. Monitoring and testing requirements 1) (performance test requirements) and 2) (monitoring to demonstrate continuous compliance) do not appear to be applicable to an open chromium anodizing tank using WAFS and complying with the regulatory specified surface tension limits.

d. Record keeping requirements associated with EPA Method 306B, being used by the permittee to monitor the surface tension of the chromic acid anodizing tank to verify compliance with the emission limit are not included as applicable requirements.

e. Record keeping requirement references to add-on control devices are not applicable since SPMP is not using any add-on air pollution control devices. The reference to add-on control device should be removed from record keeping requirements 2) b), 2) c), 2) i) and 2)j).

f. Permittees using WAFS and meeting the regulatory specified surface tension limit may not be required to conduct any performance testing and therefore making record keeping requirement 2) t) and 2) g) non-applicable.

g. Reporting requirement 5) a) appears to be non-applicable as it references permit programs under 40 CPR Part 71. 40 CPR 71 is for Title V permits being issued by the EPA.

h. Work Practice Standards and Reporting Requirements both include references to the "Administrator" and "Director." 40 CPR part 63, Subpart N has been adopted by MDNR and therefore, it would appear that "Director" is the more appropriate individual to be referenced throughout.

EPA strongly recommends MDNR-APCP modify Permit Condition EP06-001 to be more pointed toward SPMF actual practices.

Response to Comment: The draft permit has been modified as requested.

Comment #5: 5) Emission Limitation 2) and Operational Limitation/Equipment Specifications 1) in Permit Condition EP07-001 are not enforceable as a practical matter and are written as statements of fact. Requirements of each operating permit condition must be practically enforceable and EPA's guidance on practical enforceability defines a practically enforceable permit condition as one which answers "who," "what," "where," "when," "how," and "how often." Therefore, EPA recommends MDNR-APCP modify these requirements to be enforceable from a practical matter.

Response to Comment: The draft permit has been modified as requested.

Comment #6: General Requirement 3) in Permit Condition EP07-002 requires the permittee to train and certify all new and existing personnel at the miscellaneous surface coating source (emphasis added), including contract personnel, who spray apply surface coatings no later than 180 days after hiring or no later than January 10, 2011, whichever is later. It would appear that the miscellaneous surface coating source (emphasis added) is the SPMF facility and should be so stated. Additionally, January 11, 2011 is passed and so it would appear that the 180 days is the only remaining control time for painter training and certification.
Response to Comment: The draft permit has been modified as requested.

Comment #7: General Requirement 4) in Permit Condition EP07-002 is not enforceable as a practical matter and is written as a statement of fact. Requirements of each operating permit condition must be practically enforceable and EPA's guidance on practical enforceability defines a practically enforceable permit condition as one which answers "who," "what," "where," "when," "how," and "how often." Therefore, EPA recommends MDNR-APCP modify this requirement to ensure its practical enforceability.

Response to Comment: The draft permit has been modified as requested.

Comment #8: General Requirement 5) in Permit Condition EP07-002, says: The permittee shall comply with the General Provisions to 40 CFR Part 63 according to the applicability of subpart A as identified in Table 1 of this subpart." First, there is no Table 1 in this draft operating permit. Secondly, there are no subparts in an operating permit. Therefore, EPA recommends MDNR-APCP modify the wording in this requirement to fit its inclusion in an operating permit.

Response to Comment: The draft permit has been modified as requested.

Comment #9: Item 3) under the Maximum Achievable Control Technology (MACT) Applicability section of the Statement of Basis indicates § 63.11504(a)(l)(i) excludes this SPMF facility from being subject to MACT WWWWWW. § 63.11505(d)(l) also indicates that process units subject to 40 CPR part 63, Subpart N are not subject to MACT WWWWWW. EPA suggests MDNR-APCP include this additional exclusion in the Statement of Basis.

Response to Comment: The draft permit has been modified as requested.
AUG 15 2019

Mr. William Huggins, Jr.
Sullivan Precision Metal Finishing
995 North Service Road West
Sullivan, MO 63080

Re: Intermediate Operating Permit Renewal
Installation ID: 071-0131, Permit Number: OP2019-026

Dear Mr. Huggins:

Enclosed with this letter is your intermediate 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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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/bgj

Enclosures

c: PAMS File: 2014-07-032