PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2018-024
Expiration Date: MAR 27 2023
Installation ID: 183-0131
Project Number: 2016-11-013

Installation Name and Address
Superior Home Products, Inc.
211 Edinger Road
Wentzville, MO 63385
St. Charles County

Parent Company's Name and Address
Superior Home Products, Inc.
211 Edinger Road
Wentzville MO, 63385

Installation Description:
The installation manufacturers cultured marble vanity tops, bathtubs, and wall surrounds by marble casting. Fiberglass molds are fabricated and repaired as an ancillary function. The operations are a major source of hazardous air pollutants (HAPs). Specifically, the installation is a major source of styrene. The installation is subject to 40 CFR Part 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

Prepared by
Kasia Wasescha
Operating Permit Unit

Director or Designee
Department of Natural Resources

MAR 27 2018
Effective Date
# Table of Contents

I. **Installation Equipment Listing** ............................................................................................................. 4  
EMISSION UNITS WITH LIMITATIONS ........................................................................................................ 4  
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS ............................................................................. 4  

II. **Plant Wide Emission Limitations** ........................................................................................................ 5  
PERMIT CONDITION PW001 ......................................................................................................................... 5  
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations ............................................. 5  

III. **Emission Unit Specific Emission Limitations** ..................................................................................... 8  
PERMIT CONDITION 001 ............................................................................................................................... 8  
10 CSR 10-6.060, Construction Permits Required ...................................................................................... 8  
Construction Permit 0195-003, issued December 23, 1994 .................................................................. 8  
PERMIT CONDITION 002 ............................................................................................................................. 9  
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations ............................................. 9  
PERMIT CONDITION 003 ............................................................................................................................... 14  
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations ............................................. 14  
PERMIT CONDITION 004 ............................................................................................................................... 14  
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations ............................................. 14  
PERMIT CONDITION 005 ............................................................................................................................... 15  
10 CSR 10-6.065(6)(C)2.A Voluntary Limitation(s) ................................................................................... 15  
PERMIT CONDITION 006 ............................................................................................................................... 16  
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants .................................................... 16  

IV. **Core Permit Requirements** ............................................................................................................... 17  

V. **General Permit Requirements** .......................................................................................................... 22  

VI. **Attachments** ........................................................................................................................................ 27  
ATTACHMENT A ........................................................................................................................................... 28  
VOC Compliance Worksheet ..................................................................................................................... 28  
ATTACHMENT B ........................................................................................................................................... 29  
Table 1 to MACT WWWW .......................................................................................................................... 29  
ATTACHMENT C ........................................................................................................................................... 31  
Inspection/Maintenance/Repair/Malfunction Log .................................................................................... 31  
ATTACHMENT D ........................................................................................................................................... 32  
Table 3 to MACT WWWW .......................................................................................................................... 32  
ATTACHMENT E ........................................................................................................................................... 33  
Table 4 to MACT WWWW .......................................................................................................................... 33  
ATTACHMENT F ........................................................................................................................................... 34  
Table 7 to MACT WWWW .......................................................................................................................... 34  
ATTACHMENT G ........................................................................................................................................... 35
Table 14 to MACT WWW.......................................................... 35
ATTACHMENT H ................................................................. 36
Pressure Drop Monitoring .................................................... 36
## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Description</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP1</td>
<td>Gel Coat Spray Booth – Casting</td>
<td>CD1 (Filter)</td>
</tr>
<tr>
<td>EP2</td>
<td>Gel Coat Spray Booth – Mold Fabrication</td>
<td>CD2 (Filter)</td>
</tr>
<tr>
<td>EP3</td>
<td>Resin Hand Lay Up – Mold Fabrication</td>
<td>-</td>
</tr>
<tr>
<td>EP4</td>
<td>6,000 gallon storage tank</td>
<td>-</td>
</tr>
<tr>
<td>EP5</td>
<td>Respecta Casting Machine</td>
<td>-</td>
</tr>
<tr>
<td>EP6</td>
<td>Cleaning Operation</td>
<td>-</td>
</tr>
<tr>
<td>EP9</td>
<td>Curing Oven, 3.6 MMBtu/hr (pipeline natural gas)</td>
<td>-</td>
</tr>
</tbody>
</table>

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP7</td>
<td>Grinding Booth</td>
</tr>
<tr>
<td>EP8A</td>
<td>Panel Sander – sanding of panels &lt; 40&quot; wide</td>
</tr>
<tr>
<td>EP8B</td>
<td>Grinding Booth – grinding panels &gt; 40&quot; wide, and grinding tubs &amp; shower bases</td>
</tr>
<tr>
<td></td>
<td>(2) Acetone Tanks for Manual Cleaning of Hand Pouring Tools</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

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

**PERMIT CONDITION PW001**

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants:
Reinforced Plastic Composites Production

**General Compliance Requirements:**

1. This permit condition applies to each affected source at reinforced plastic composites production facilities. [§63.5790(a)]
   a) The affected source consists of all parts of the facility engaged in the following operations: open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound manufacture, HAP-containing materials storage, and repair operations on parts manufactured. [§63.5790(b)]
2. The permittee shall be in compliance at all times with the work practice standards in Table 4 (See Attachment E), as well as the organic HAP emissions limits in Table 3 (See Attachment D), or the organic HAP content limits in Table 7 (See Attachment F), as applicable, that the permittee is meeting without the use of add-on controls. [§63.5835(a)]
3. The permittee shall be in compliance with all organic HAP emission limits in MACT WWWW that are met using add-on controls, except during periods of startup, shutdown, and malfunction. [§63.5835(b)]
4. The permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i). [§63.5835(c)]
5. The permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3) for any organic HAP emissions limits the permittee meets using an add-on control. [§63.5835(d)]
6. All operations at existing facilities not listed in §63.5805(a) shall meet the organic HAP emission limits in Table 3 (See Attachment D) and the work practice standards in Table 4 (See Attachment E) that apply, regardless of the quantity of HAP emitted. [§63.5805(b)]

**General Provisions:**
The permittee shall comply with all parts of the General Provisions in §§63.1 through 63.15 that apply from Table 15 of MACT WWWW.

**Notifications:**
If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the director within 15 calendar days after the change. [§63.5905(b)]
**Recordkeeping:**

1. The permittee shall keep the records listed in §63.5915(a)(1) through (3). [§63.5915(a)]
   a) A copy of each notification and report that the permittee submitted to comply with MACT WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements of §63.10(b)(2)(xiv). [§63.5915(a)(1)]
   b) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [§63.5915(a)(2)]
   c) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2). [§63.5915(a)(3)]

2. The permittee shall keep all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Tables 3 and 7 (see Attachments D and H). [§63.5915(c)]

3. The permittee shall keep a certified statement that they are in compliance with the work practice requirements in Table 4 (see Attachment E), as applicable. [§63.5915(d)]

4. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]

5. As specified in §63.10(b)(1), the permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]

6. The permittee shall keep each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records offsite for the remaining three years. [§63.5920(c)]

7. The permittee shall keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

8. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.

**Reporting:**

1. The permittee must submit each report in Table 14 (see Attachment G) that applies by the dates in 10 CSR 10-6.065(6)(C)1.C found in Section V: General Permit Requirements. [§63.5910(a)&(b)]

2. The compliance report shall contain the information in §63.5910(c)(1) through (6). [§63.5910(c)]
   a) Company name and address. [§63.5910(c)(1)]
   b) Statement by a responsible official with that official’s name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(3)]
   c) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
   d) If the permittee had a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with the permittee’s startup, shutdown, and malfunction plan, the compliance report must include in the information in §63.10(d)(5)(i). [§63.5910(c)(4)]
   e) If there are no deviations from any organic HAP emissions limitations (emission limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 (see Attachment E), a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]

3. For each deviation from an organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where the permittee is not using a CMS to comply with the organic HAP emissions limitations or work practice standards in MACT WWWW, the compliance report must contain the
information in §63.5190(c)(1) through (4) and in §63.5190(d) and (2). This includes periods of startup, shutdown, and malfunction. [§63.5910(d)]

a) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]

b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]

4. The permittee shall report all deviations as defined in MACT WWW in the semi-annual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 (see Attachment G), along with, or as part of, the semi-annual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in MACT WWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.5910(g)]

5. Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 (see Attachment G), and not based on the requirements in §63.999. [§63.5910(h)]

6. Where multiple compliance options are available, the permittee must state in the next compliance report if there is a change in compliance options since the last compliance report. [§63.5910(i)]

7. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedance of any limitation established by this permit condition.
III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001
10 CSR 10-6.060, Construction Permits Required
Construction Permit 0195-003, issued December 23, 1994

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP1</td>
<td>Gel coat spray booth – casting, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>Magnum Venus TLN-XG-300 (HVLP)</td>
</tr>
<tr>
<td>EP2</td>
<td>Gel coat spray booth – mold fabrication, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>Devilbiss Finishline 3</td>
</tr>
<tr>
<td>EP3</td>
<td>Resin hand layup – mold fabrication, 0.009 ton/hr manufactured 1994</td>
<td>Not available</td>
</tr>
<tr>
<td>EP5</td>
<td>Casting machine, 400 lb/hr, manufactured 2015</td>
<td>Respecta Model DB 11A/9-23</td>
</tr>
</tbody>
</table>

Emission Limitation:
The permittee shall emit less than 40 tons of volatile organic compounds (VOCs) in any consecutive 12-month period. [Special Condition 1]

Monitoring/Recordkeeping:
2. The permittee shall maintain an accurate record of VOC emissions and shall record the monthly and running 12-month totals of VOC emissions in Attachment A or an equivalent.
3. These records shall be retained for a minimum of five years and be made available immediately to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition 2 & 4]

Reporting:
1. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month, if the 12-month cumulative total records show that the source exceeded the emission limitation of this permit condition. [Special Condition 3]
2. The permittee shall report any deviations from the standards, monitoring, and recordkeeping requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.
PERMIT CONDITION 002
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants:
Reinforced Plastic Composites Production

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP1</td>
<td>Gel coat spray booth – casting, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>CD1 (Filter)</td>
</tr>
<tr>
<td>EP2</td>
<td>Gel coat spray booth – mold fabrication, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>CD2 (Filter)</td>
</tr>
<tr>
<td>EP3</td>
<td>Resin hand layup – mold fabrication, 0.009 ton/hr, manufactured 1994</td>
<td>-</td>
</tr>
<tr>
<td>EP5</td>
<td>Casting machine, 400 lb/hr, manufactured 2015</td>
<td>-</td>
</tr>
</tbody>
</table>

Emission Limitations:
1. The permittee shall meet the organic HAP emission limits in Table 3 (see Attachment D) and the work practice standards in Table 4 (see Attachment E) that apply. [§63.5805(b)]
2. If the permittee conducts repair operations subject to MACT WWWW as defined in §63.5785, these repair operations shall meet the requirements in Tables 3 and 4 (see Attachments D and E) and are not required to meet the 95 percent organic HAP emissions reduction requirements in §63.5805(a)(1) or (d). [§63.5805(g)]

Options for Meeting Standards:
1. The permittee shall use one of the following methods in §63.5810(a) through (d) to meet the standards for open molding or centrifugal casting operations in Table 3 (see Attachment D). The permittee may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of their emissions to an add-on control. The permittee may use different compliance options for the different operations listed in Table 3 (see Attachment D). The necessary calculations shall be completed within 30 days after the end of each month. The permittee may switch between the compliance options in §63.5810(a) through (d). When the permittee changes to an option based on a 12-month rolling average, the permittee must base the average on the previous 12 months of data calculated using the compliance option changing to, unless previously using an option that did not require maintaining records of resin and gel coat use. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. [§63.5810]
a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 to this subpart. Calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee shall calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 (see Attachment B) for open molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emissions factor calculation should include
any and all emission reduction techniques used including any add-on controls. If the permittee is using vapor suppressants to reduce HAP emissions, the permittee must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in Appendix A to MACT WWWW. If the permittee is using an add-on control device to reduce HAP emissions, the permittee must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in Table 1 (see Attachment B), or a site-specific emission factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Use Equation 1 of MACT WWWW to calculate the add-on control factor used in this organic HAP emissions factor equations. [§63.5810(a)(1)]

\[
\text{Add-on Control Factor} = 1 - \frac{\% \text{ Control Efficiency}}{100} \quad (\text{Eq. 1})
\]

Where:
\% Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of §63.5850.

i) If the calculated emission factor is less than or equal to the appropriate emission limit, the permittee has demonstrated that this process stream complies with the emission limit in Table 3 (see Attachment D). It is not necessary that all the process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat the permittee uses, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in §63.5810(a) through (d), then all process streams using that individual resin or gel coat must be included in the averaging calculations. [§63.5810(a)(2)]

b) Demonstrate that, on average, the permittee meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.
Demonstrate that on average the permittee meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 (see Attachment D) that applies. [§63.5810(b)]

i) Group the process streams described in §63.5810(a) by operation type and resin application method or gel coat type listed in Table 3 (see Attachment D) and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in §63.5810(a)(1) and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of MACT WWWW. [§63.5810(b)(i)(i)]

\[
\text{Average Organic HAP Emission Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Process Stream } EF_i \times \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i} \quad (\text{Eq. 2})
\]

Where:
Actual Process Stream \( EF_i \) = actual organic HAP emissions factor for process stream \( i \), lbs/ton;
Material\( _i \) = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream \( i \), tons;
n = number of process streams where the permittee calculated an organic HAP emissions factor.

ii) The permittee may, but is not required to, include process streams where they have demonstrated compliance as described in §63.5810(a), subject to the limitations described in §63.5810(a)(2), and they are not required to and should not include process streams for which they will demonstrate compliance using the procedures in §63.5810(d). [§63.5810(b)(1)(ii)]
iii) Compare each organic HAP emissions factor calculated in §63.5810(b)(1) with its corresponding organic HAP emissions limit in Table 3 (see Attachment D). If all emissions factors are equal to or less than their corresponding emission limits, then the permittee is in compliance. [§63.5810(b)(2)]

c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 (see Attachment D) that applies. When using this option, the permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for all centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other. [§63.5810(c)]

i) Each month calculate the weighted average organic HAP emissions limit for all open molding operations and the weighted average organic HAP emissions limit for all centrifugal casting operations for the permittee’s facility for the last 12-month period to determine the organic HAP emissions limit the permittee must meet. To do this, multiply the individual organic HAP emissions limits in Table 3 (see Attachment D) for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in the open molding (centrifugal casting) over the last 12 months as shown in Equation 3 of MACT WWW. [§63.5810(c)(1)]

\[
\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n} (EL_i \times \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i} \quad (\text{Eq. 3})
\]

Where:
- \(EL_i\) = organic HAP emissions limit for operation type \(i\), lbs/ton from Table 3 from MACT WWW;
- \(\text{Material}_i\) = neat resin plus or neat gel coat plus used during the last 12-month period for operation type \(i\), tons;
- \(n\) = number of operations.

ii) Each month calculate the weighted average organic HAP emissions factor for open molding and centrifugal casting. To do this, multiply the actual open molding (centrifugal casting) operation organic HAP emission factor calculated in §63.5810(b)(1) and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations as shown in Equation 4 of MACT WWW. [§63.5810(c)(2)]

\[
\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Operation } EF_i \times \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i} \quad (\text{Eq. 4})
\]

Where:
- \(\text{Actual Individual } EF_i\) = Actual organic HAP emissions factor for operation type \(i\), lbs/ton;
- \(\text{Material}_i\) = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type \(i\), tons;
- \(n\) = number of operations.

iii) Compare the values calculated in §63.5810(c)(1) and (2). If each 12-month rolling average organic HAP emission factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the permittee is in compliance. [§63.5810(c)(3)]

d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling. [§63.5180(d)]
i) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, the permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in §63.5180(d)(1). Table 7 (see Attachment F) presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 (see Attachment F), the resin is in compliance. [§63.5810(d)(1)]

ii) The permittee may also use a weighted average organic HAP content for each application method described in §63.5810(d)(1). Calculate the weighted average organic HAP content monthly. Use Equation 2 in §63.5810(b)(1) except substitute organic HAP content for organic HAP emission factor. The permittee is in compliance if the weighted average HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7. [§63.5810(d)(2)]

iii) The permittee may simultaneously use the averaging provisions in §63.5810(b) or (c) to demonstrate compliance for any operations and/or resins that are not included in the compliance demonstrations in §63.5810(d)(1) and (2). However, any resins for which the permittee claims compliance under the options in §63.5810(d)(1) and (2) shall not be included in any of the averaging calculations described in §63.5810(b) or (c) of this section. [§63.5810(d)(3)]

iv) The permittee does not have to keep records of resin use for any of the individual resins where compliance is demonstrated under the option in §63.5810(d)(1) unless they elect to include that resin in the averaging calculations described in §63.5810(d)(1) unless they elect to include that resin the averaging calculations described in §63.5810(d)(2). [§63.5810(d)(4)]

**Monitoring:**

1. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating. [§63.5895(b)(1)]

2. The permittee shall not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of MACT WWWW, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. [§63.5895(b)(2)]

3. At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment. [§63.5895(b)(3)]

4. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§63.5895(b)(4)]

5. The permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the permittee is meeting any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 (see Attachment D). The permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if they are meeting any organic HAP content limits in Table 7 (see Attachment E) if the permittee is averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records shall be based on SDS or on resin specifications supplied by the resin supplier. [§63.5895(c)]
6. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, the permittee shall retain the records of resin and gel coat organic HAP content, and must include the list of these resins and gel coats and identify their applicable methods in the semi-annual compliance reports. If after the permittee has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the permittee changes the application method or controls, then the permittee again must demonstrate that the individual resin or gel coat meets its emission limit as specified in §63.5810(a). If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 (see Attachment D), the permittee shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average. [§63.5895(d)]

7. The permittee shall demonstrate continuous compliance with each standard in §63.5805 that applies according to the method specified in §63.5900(a)(1) through (3). [§63.5900(a)]
   a) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 (see Attachment D), on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(1)]
   b) Compliance with organic HAP content limits in Table 7 (see Attachment F) is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7, as discussed in §63.5895(d). [§63.5900(a)(3)]
   c) Compliance with the work practice standards in Table 4 (see Attachment E) is demonstrated by performing the work practice required for the operation. [§63.5900(a)(4)]

8. Except as provided in §63.5900(d), during periods of startup, shutdown, or malfunction, the permittee shall meet the organic HAP emissions limits and work practice standards that apply. [§63.5900(c)]

9. Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources and standards specified in §63.5900(d) are not violations if the permittee demonstrates to the director’s satisfaction that they were operating in accordance with §63.6(e)(1). The director will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e). [§63.5900(e)]

**Recordkeeping:**

The permittee shall keep records as specified in Permit Condition PW001.

**Reporting:**

1. The permittee must report each deviation from each standard in §63.5805 that applies. The deviations must be reported according to the requirements in §63.5910. [§63.5900(b)]

2. The permittee shall report any deviation from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.
PERMIT CONDITION 003
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants:
Reinforced Plastic Composites Production

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP6</td>
<td>Flushing of cleaning solutions through the Respecta casting machine’s mixing chamber</td>
</tr>
</tbody>
</table>

**Emission Limitations:**
The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contains resin. [§63.5805(b) & Table 4 to MACT WWWW]

**Monitoring:**
The permittee shall demonstrate continuous compliance with the work practice standards in Table 4 (see Attachment E) that applies by performing the work practice required for the permittee’s operation. [§63.5900(a)(4)]

**Recordkeeping:**
The permittee shall keep records as specified in Permit Condition PW001.

**Reporting:**
The permittee shall report as specified in Permit Condition PW001.

---

PERMIT CONDITION 004
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants:
Reinforced Plastic Composites Production

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP4</td>
<td>6,000 Gallon Resin Storage Tank</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. [§63.5805(b) & Table 4 to MACT WWWW]

**Monitoring:**
Compliance with the work practice standards of Table 4 (see Attachment E) is demonstrated by performing the work practice standard required by the permittee’s operation. [§63.5900(a)(4)]

**Recordkeeping:**
The permittee shall keep records as specified in Permit Condition PW001.

**Reporting:**
The permittee shall report deviations as specified in Permit Condition PW001.
PERMIT CONDITION 005
10 CSR 10-6.065(6)(C)2.A Voluntary Limitation(s)

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP1</td>
<td>Gel coat spray booth – casting, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>CD1 (Filter)</td>
</tr>
<tr>
<td>EP2</td>
<td>Gel coat spray booth – mold fabrication, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>CD2 (Filter)</td>
</tr>
</tbody>
</table>

**Operational Limitations:**
1. The permittee shall operate the control devices as specified in this permit condition at all times the associated emission points are operating.
2. The control devices shall be operated and maintained in accordance with the manufacturer’s specifications. The control devices shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources’ employees may easily observe them.
3. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty.

**Monitoring/Recordkeeping:**
1. The permittee shall maintain an operating and maintenance log using Attachment C, or an equivalent, for each of the control devices that shall include the following:
   a) Incidents of malfunction, with impacts on emissions, durations of events, probable causes and corrective actions.
   b) Maintenance activities, with inspection schedule, repair actions, and replacements.
2. The permittee shall monitor and record the operating pressure drop across the control devices at least once daily when units are in operation using Attachment H, or an equivalent.

**Reporting:**
1. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65101 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.
**PERMIT CONDITION 006**
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
<th>Control Device</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP1</td>
<td>Gel coat spray booth – casting, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>CD1 (Filter)</td>
</tr>
<tr>
<td>EP2</td>
<td>Gel coat spray booth – mold fabrication, 30 lb/hr (23 oz/min), manufactured 2014</td>
<td>CD2 (Filter)</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20%.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring/Recordkeeping:**
Not required. See Statement of Basis.

**Reporting:**
1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

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

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

**10 CSR 10-6.065 Operating Permits**

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

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

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

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

1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

**10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.
10 CSR 10-6.165 Restriction of Emission of Odors

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

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

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

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 10-6.280 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.

10 CSR 10-6.065(6)(C)1.B Permit Duration

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

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

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

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources’ personnel upon request.

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

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.
10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

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

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.
10 CSR 10-6.065(6)(C)6 Permit Shield

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
   a) The applicable requirements are included and specifically identified in this permit, or
   b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7 shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

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

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

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

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.

1) Before making a change under this provision, the permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.

b) The permit shield shall not apply to these changes.

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

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:

a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Raymond Daggett, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source.
owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause
This permit shall be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2) 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,
3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
a) The permit has a remaining term of less than three years;
b) The effective date of the requirement is later than the date on which the permit is due to expire;
or  
c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis
This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments
Attachments follow.
### Attachment A

**VOC Compliance Worksheet**

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

<table>
<thead>
<tr>
<th>Material Used (name, type)</th>
<th>Amount of Material Used¹ (lbs)</th>
<th>VOC Content² (%)</th>
<th>VOC Emitted³ (%)</th>
<th>Monthly VOC Emissions⁴ (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Sum of Monthly Startup, Shutdown, and Malfunction (SSM) VOC Emissions⁵ (tons):**

**Sum of Monthly VOC Emissions⁶ (tons):**

**12-Month Rolling Total VOC Emissions⁷ (tons):**

² Obtained from the SDS sheet. If a range is given, the highest value in the range shall be used.
³ Use the CFA model ("CFA Emission Models for the Reinforced Plastic Industries" by Robert A. Haberlein, February 28, 1998) to estimate VOC emissions from Gel Coat Spraying and Resin Hand Layup applications. Use 2% for Casting, AP-42 Chapter 4.4
⁴ Amount of material used (lbs) × VOC Content (%) × VOC Emitted (%) × 0.0005 (ton/lb) = VOC Emissions (tons)
⁵ As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.
⁶ Sum of Monthly VOC Emissions and SSM Emissions.
⁷ Sum of the most recent 12 months of Monthly VOC Emissions. A 12-Month Rolling Total VOC Emissions of 40.0 tons demonstrates compliance.
Table 1 to MACT WWWW

Table 1 to Subpart WWWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

As specified in §63.5610, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:

<table>
<thead>
<tr>
<th>Stream</th>
<th>Type of Operation</th>
<th>Application</th>
<th>EF Equation (for materials with 33 percent or more organic HAP)</th>
<th>EF Equation (for materials with less than 33 percent organic HAP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. open molding</td>
<td>a. manual</td>
<td>nonvapor-suppressed resin</td>
<td>EF = 0.126 x %HAP x 2000</td>
<td>EF = ((0.286 x %HAP)-0.0529) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>vapor-suppressed resin</td>
<td>EF = 0.126 x %HAP x 2000 x (1-(0.5 x VSE factor))</td>
<td>EF = ((0.286 x %HAP)-0.0529) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>vacuum bagging/closed-mold curing with roll-out</td>
<td>EF = 0.126 x %HAP x 2000 x 0.8</td>
<td>EF = ((0.286 x %HAP)-0.0529) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>vacuum bagging/closed-mold curing without roll-out</td>
<td>EF = 0.126 x %HAP x 2000 x 0.5</td>
<td>EF = ((0.286 x %HAP)-0.0529) x 2000</td>
</tr>
<tr>
<td></td>
<td>b. atomized mechanical</td>
<td>nonvapor-suppressed resin</td>
<td>EF = 0.169 x %HAP x 2000</td>
<td>EF = ((0.714 x %HAP)-0.18) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>vapor-suppressed resin</td>
<td>EF = 0.169 x %HAP x 2000 x (1-(0.45 x VSE factor))</td>
<td>EF = ((0.714 x %HAP)-0.18) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>vacuum bagging/closed-mold curing with roll-out</td>
<td>EF = 0.169 x %HAP x 2000 x 0.85</td>
<td>EF = ((0.714 x %HAP)-0.18) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>vacuum bagging/closed-mold curing without roll-out</td>
<td>EF = 0.169 x %HAP x 2000 x 0.55</td>
<td>EF = ((0.714 x %HAP)-0.18) x 2000</td>
</tr>
<tr>
<td></td>
<td>c. nonatomized mechanical</td>
<td>nonvapor-suppressed resin</td>
<td>EF = 0.107 x %HAP x 2000</td>
<td>EF = ((0.157 x %HAP)-0.0165) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>resin application</td>
<td>EF = 0.107 x %HAP x 2000 x (1-(0.45 x VSE factor))</td>
<td>EF = ((0.157 x %HAP)-0.0165) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>closed-mold curing with roll-out</td>
<td>EF = 0.107 x %HAP x 2000 x 0.85</td>
<td>EF = ((0.157 x %HAP)-0.0165) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>vacuum bagging/closed-mold curing without roll-out</td>
<td>EF = 0.107 x %HAP x 2000 x 0.85</td>
<td>EF = ((0.157 x %HAP)-0.0165) x 2000</td>
</tr>
<tr>
<td></td>
<td>d. atomized mechanical</td>
<td>resin application with robotic or automated spray control</td>
<td>nonvapor-suppressed resin</td>
<td>EF = 0.169 x %HAP x 2000 x 0.77</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ii. nonvapor-suppressed resin</td>
<td>EF = 0.184 x %HAP x 2000</td>
<td>EF = ((0.2746 x %HAP)-0.0298) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ii. vapor-suppressed resin</td>
<td>EF = 0.12 x %HAP x 2000</td>
<td>EF = ((0.2746 x %HAP)-0.0298) x 2000</td>
</tr>
<tr>
<td></td>
<td>e. filament application</td>
<td>nonvapor-suppressed gel coat</td>
<td>EF = 0.445 x %HAP x 2000</td>
<td>EF = ((1.03646 x %HAP)-0.195) x 2000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ii. nonvapor-suppressed resin</td>
<td>EF = 0.184 x %HAP x 2000</td>
<td>EF = ((0.2746 x %HAP)-0.0298) x 2000</td>
</tr>
<tr>
<td></td>
<td>f. atomized spray gel coat</td>
<td>coating</td>
<td>EF = 0.445 x %HAP x 2000</td>
<td>EF = ((1.03646 x %HAP)-0.195) x 2000</td>
</tr>
</tbody>
</table>
g. nonatomized spray gel coat application

<table>
<thead>
<tr>
<th></th>
<th>nonvapor-suppressed gel coat</th>
<th>EF = 0.185 x %HAP x 2000</th>
<th>EF = ((0.4505 x %HAP)-0.0505) x 2000</th>
</tr>
</thead>
<tbody>
<tr>
<td>h. atomized spray gel coat application using robotic or automated spray</td>
<td>nonvapor-suppressed gel coat</td>
<td>EF = 0.445 x %HAP x 2000 x 0.73</td>
<td>EF = ((1.03646 x %HAP)-0.1951) x 2000 x 0.73</td>
</tr>
</tbody>
</table>

Footnotes to Table 1

1. These equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

2. To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

3. Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

4. The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

5. This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

6. Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

7. These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

8. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.
# Attachment C

## Inspection/Maintenance/Repair/Malfunction Log

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction</th>
<th>Impact</th>
<th>Duration</th>
<th>Cause</th>
<th>Action</th>
<th>Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attachment D
Table 3 to MACT WWWW

Table 3 to Subpart WWWW of Part 63—Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP

As specified in §63.5805, the permittee shall meet the following organic HAP emissions limits that apply:

<table>
<thead>
<tr>
<th>If the operation type is...</th>
<th>And uses...</th>
<th>8The organic HAP emissions limit is...</th>
</tr>
</thead>
<tbody>
<tr>
<td>open molding—tooling</td>
<td>a. mechanical resin application</td>
<td>254 lb/ton.</td>
</tr>
<tr>
<td></td>
<td>b. manual resin application</td>
<td>157 lb/ton.</td>
</tr>
<tr>
<td>open molding—gel coat&lt;sup&gt;8&lt;/sup&gt;</td>
<td>a. tooling gel coating</td>
<td>440 lb/ton.</td>
</tr>
<tr>
<td></td>
<td>b. white/off white pigmented gel coating</td>
<td>267 lb/ton.</td>
</tr>
<tr>
<td></td>
<td>c. all other pigmented gel coating</td>
<td>377 lb/ton.</td>
</tr>
<tr>
<td></td>
<td>d. CR/HS or high performance gel coat</td>
<td>605 lb/ton.</td>
</tr>
<tr>
<td></td>
<td>e. fire retardant gel coat</td>
<td>854 lb/ton.</td>
</tr>
<tr>
<td></td>
<td>f. clear production gel coat</td>
<td>522 lb/ton.</td>
</tr>
</tbody>
</table>

<sup>8</sup> If the permittee only applies gel coat with manual application, for compliance purposes, treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If the permittee uses multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the permittee may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.
As specified in §63.5805, the permittee shall meet the work practice standards in the following table that apply:

<table>
<thead>
<tr>
<th>For...</th>
<th>The permittee shall...</th>
</tr>
</thead>
<tbody>
<tr>
<td>a new or existing cleaning operation</td>
<td>not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.</td>
</tr>
<tr>
<td>a new or existing materials HAP-containing materials storage operation</td>
<td>keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.</td>
</tr>
</tbody>
</table>
Table 7 to Subpart WWWW of Part 63—Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type

As specified in §63.5810(d), when electing to use the same resin(s) for multiple resin application methods, the permittee may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

<table>
<thead>
<tr>
<th>If the facility has the following resin type and application method</th>
<th>The highest resin weight is * * * percent organic HAP content, or weighted average weight percent organic HAP content, the permittee can use for...</th>
<th>is...</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. CR/HS resins, centrifugal casting$^{9,10}$</td>
<td>a. CR/HS mechanical</td>
<td>1148.0</td>
</tr>
<tr>
<td></td>
<td>b. CR/HS filament application</td>
<td>48.0</td>
</tr>
<tr>
<td></td>
<td>c. CR/HS manual</td>
<td>48.0</td>
</tr>
<tr>
<td>2. CR/HS resins, nonatomized mechanical</td>
<td>a. CR/HS filament application</td>
<td>46.4</td>
</tr>
<tr>
<td></td>
<td>b. CR/HS manual</td>
<td>46.4</td>
</tr>
<tr>
<td>3. CR/HS resins, filament application</td>
<td>CR/HS manual</td>
<td>42.0</td>
</tr>
<tr>
<td>4. non-CR/HS resins, filament application</td>
<td>a. non-CR/HS mechanical</td>
<td>1145.0</td>
</tr>
<tr>
<td></td>
<td>b. non-CR/HS manual</td>
<td>45.0</td>
</tr>
<tr>
<td></td>
<td>c. non-CR/HS centrifugal casting$^{9,10}$</td>
<td>45.0</td>
</tr>
<tr>
<td>5. non-CR/HS resins, nonatomized mechanical</td>
<td>a. non-CR/HS manual</td>
<td>38.5</td>
</tr>
<tr>
<td></td>
<td>b. non-CR/HS centrifugal casting$^{9,10}$</td>
<td>38.5</td>
</tr>
<tr>
<td>6. non-CR/HS resins, centrifugal casting$^{9,10}$</td>
<td>non-CR/HS manual</td>
<td>37.5</td>
</tr>
<tr>
<td>7. tooling resins, nonatomized mechanical</td>
<td>tooling manual</td>
<td>91.4</td>
</tr>
<tr>
<td>8. tooling resins, manual</td>
<td>tooling atomized mechanical</td>
<td>45.9</td>
</tr>
</tbody>
</table>

$^9$ If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

$^{10}$ If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

$^{11}$ Nonatomized mechanical application must be used.
**Attachment G**  
Table 14 to MACT WWWW

As required in §63.5910(a), (b), (g), and (h), the permittee must submit the following reports according to the schedules described in 10 CSR 10-6.065(6)(C)1.C found in Section V: General Permit Requirements.

<table>
<thead>
<tr>
<th>The permittee must submit</th>
<th>The report must contain...</th>
</tr>
</thead>
<tbody>
<tr>
<td>a(n)</td>
<td></td>
</tr>
<tr>
<td>Compliance report</td>
<td>a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period</td>
</tr>
<tr>
<td></td>
<td>b. The information in §63.5910(d) if the permittee has a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in §63.8(c)(7), the report must contain the information in §63.5910(e)</td>
</tr>
<tr>
<td></td>
<td>c. The information in §63.10(d)(5)(i) if the permittee had a startup, shutdown or malfunction during the reporting period, and the permittee took actions consistent with the startup, shutdown, and malfunction plan</td>
</tr>
</tbody>
</table>

2. An immediate startup, shutdown, and malfunction report if there was a startup, shutdown, or malfunction during the reporting period that is not consistent with the startup, shutdown, and malfunction plan

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a(n)</td>
<td>a. Actions taken for the event</td>
</tr>
<tr>
<td></td>
<td>b. The information in §63.10(d)(5)(ii)</td>
</tr>
</tbody>
</table>
Attachment H
Pressure Drop Monitoring

<table>
<thead>
<tr>
<th>Date</th>
<th>Emission Point / Control Device</th>
<th>Pressure Drop (w.c.)</th>
<th>Manufacturer's Recommended Value (w.c.)</th>
<th>Within Specifications? (Yes / No)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
The installation manufacturers cultured marble vanity tops, bathtubs, and wall surrounds by marble casting. Fiberglass molds are fabricated and repaired as an ancillary function. The operations are a major source of hazardous air pollutants (HAPs). Specifically, the installation is a major source of the HAP styrene. The installation is subject to 40 CFR Part 63, Subpart WWWW.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>1.09</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>1.09</td>
</tr>
<tr>
<td>Sulfur Oxides (SO&lt;sub&gt;x&lt;/sub&gt;)</td>
<td>&lt;0.01</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO&lt;sub&gt;x&lt;/sub&gt;)</td>
<td>2.08</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOCs)</td>
<td>50.47</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>1.25</td>
</tr>
<tr>
<td>Hazardous Air Pollutants&lt;sup&gt;13&lt;/sup&gt; (HAPs)</td>
<td>47.43</td>
</tr>
<tr>
<td>Styrene (100-42-5)</td>
<td>47.43</td>
</tr>
<tr>
<td>Methyl methacrylate (80-62-6)</td>
<td>3.23</td>
</tr>
<tr>
<td>Toluene (108-88-3)</td>
<td>0.33</td>
</tr>
</tbody>
</table>

<sup>12</sup> Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. PTE calculations were obtained from OP2012-017. Styrene emission factors were obtained from Table 3 of MACT WWWW, Table 5 of EPA document “Locating and Estimating Air Emissions from Sources of Styrene”, and AP-42 Chapter 4, Table 4.4-2. Methyl methacrylate (MMA)’s emission factor was obtained from “ANSI/ACMA/ICPA UEF-1-2011a EF Table 1: Unified Emission Factors for Open Molding of Composites” assuming an MMA concentration of 3% in the gel coatings. Toluene PTE was estimated with a 20% safety factor by using 2016 EIQ data.

<sup>13</sup> HAPs PTE under 0.1 ton/year not listed.
Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM$_{10}$)</td>
<td>0.26</td>
<td>0.26</td>
<td>0.22</td>
<td>0.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM$_{2.5}$)</td>
<td>0.26</td>
<td>0.26</td>
<td>0.22</td>
<td>0.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Sulfur Oxides ($\text{SO}_x$)</td>
<td>-</td>
<td>-</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO$_x$)</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>9.49</td>
<td>9.50</td>
<td>10.48</td>
<td>10.17</td>
<td>7.79</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>&lt; 0.01</td>
<td>&lt; 0.01</td>
<td>&lt; 0.01</td>
<td>&lt; 0.01</td>
<td>&lt; 0.01</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>9.29</td>
<td>9.77</td>
<td>10.29</td>
<td>10.55</td>
<td>8.05</td>
</tr>
<tr>
<td>Methyl methacrylate (80-62-6)</td>
<td>0.11</td>
<td>0.20</td>
<td>0.14</td>
<td>0.10</td>
<td>0.05</td>
</tr>
<tr>
<td>Styrene (100-42-5)</td>
<td>9.02</td>
<td>8.96</td>
<td>9.90</td>
<td>9.64</td>
<td>7.49</td>
</tr>
<tr>
<td>Toluene (108-88-3)</td>
<td>0.04</td>
<td>0.10</td>
<td>0.17</td>
<td>0.16</td>
<td>0.16</td>
</tr>
<tr>
<td>Dichloromethane (75-09-2)</td>
<td>0.15</td>
<td>0.51</td>
<td>0.08</td>
<td>0.65</td>
<td>0.35</td>
</tr>
</tbody>
</table>

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

1. Part 70 Operating Permit Application, received November 4, 2016;
2. 2016 Emissions Inventory Questionnaire, received March 1, 2017; and
4. WebFIRE;
5. Operating Permit OP2012-017, issued May 7, 2012
6. Construction Permit 0994-014, issued September 30, 1994;
7. Construction Permit 0195-003, issued December 23, 1994;
8. No Construction Permit Required Determination, issued December 3, 2006

-- SO$_x$ is under the reporting threshold in the EIQ.
Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.
None.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-5.300, Control of Emissions from Solvent Metal Cleaning
This rule does not apply to hand cleaning or flush cleaning operations. The only cleaning operations the installation has are hand cleaning and flush cleaning operations. Therefore, this rule does not apply per 10 CSR 10-5.300(1)(D)(E).

10 CSR 10-5.410, Control of Emissions From Manufacture of Polystyrene Resin
This rule does not apply because the installation does not manufacture polystyrene resin.

10 CSR 10-5.455, Control of Emissions From Solvent Metal Cleaning Operations
This rule does not apply. The acetone tanks are exempt from this rule because it is a cold cleaner per 10 CSR 10-5.455(1)(C)1. The flushing of the casting machine uses strictly S-0280 Resin Flush and methylene chloride. The rule does not apply because methylene chloride is not considered a VOC and the potential VOC emissions from the S-0280 Resin Flush are less than three tons per rolling 12-month period in the absence of control equipment. See 10 CSR 10-5.455(1)(B).

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions
These rules do not apply. EP9 Curing Oven is fueled solely by natural gas and is thus exempt per 10 CSR 10-6.260(1)(A)2 and 10 CSR 10-6.261(1)(A).

10 CSR 10-6.400, Restriction of Particulate Matter from Industrial Processes
This rule does not apply due to the installation's PM-emitters meeting exemptions to the rule. EP1, EP2, EP7, EP8A, and EP8B all have control devices with an efficiency of over 90%, and are thus exempt per 10 CSR 10-6.400(1)(B)15.

10 CSR 10-6.405, Restriction of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating
This rule does not apply. The curing oven is natural gas fired, and is thus exempt per 10 CSR 10-6.405(1)(E).

Construction Permit History
Construction Permit 0994-014, issued September 30, 1994
This construction permit was issued for a fiberglass mold fabrication unit which involved the use of a gel coat and resin. This construction permit contains special conditions that are not included in this operating permit because the construction permit was replaced in its entirety by Construction Permit 0195-003.

Construction Permit 0195-003, issued December 23, 1994
This construction permit was issued to begin a cultured marble manufacturing line aided by a fiberglass mold fabrication department.
• Permit Condition 1 restricted VOCs to below de minimis levels. It has been added to this permit.
• Permit Condition 2 requires VOC emission records to be kept. It has been added to this permit.
• Permit Condition 3 requires reporting to MoDNR’s Compliance/Enforcement Section if the VOC limit is exceeded. It has been added to this permit.
• Permit Condition 4 requires records to be kept. It has been added to this permit.

No Construction Permit Required Determination, issued December 3, 2006
This no construction permit required determination was issued for a new grinding booth. No permit was required because the same grinding activities will take place in the new grinding area and maximum design production capacity will not change with the new configuration. There was no increase in emissions from the equipment change.

New Source Performance Standards (NSPS) Applicability

This subpart does not apply. The 6,000 gallon storage vessel is below the minimum applicable storage capacity of this rule.

Maximum Achievable Control Technology (MACT) Applicability

This subpart applies. The installation is an existing source subject to the requirements of this subpart. The installation’s potential-to-emit is less than 100 tons per year of organic HAPs and therefore the installation is not subject to the standards in §63.5805(a)(1) and must meet the standards in Table 3 of MACT WWW. The primary sources of HAP emissions that are subject to this MACT are the gel coat spray booths, resin hand layup mold fabrication, cleaning operation, and HAP containing storage materials.

40 CFR 63.6(e)(1) and (2), Subpart A, Startup, shutdown, and malfunction plan and recordkeeping requirements, requires the source to operate at all times, including periods of startup, shutdown, and maintenance (SSM) in a manner consistent with good air pollution control practices for minimizing emissions. Written SSM plans are required to be completed, upgraded as necessary, and records maintained for each SSM event. MACT WWW requires this only for sources using add-on controls. The installation does not use add-on controls to comply with the rule, therefore, is not required to submit a written SSM plan. 40 CFR 63.10(d)(5), Subpart A, Startup, shutdown, and
malfunction reports requirement does not apply to this installation. This requirement only applies for installations that use add-on controls.

EP5 is considered a polymer casting process as defined in 40 CFR §63.5935; therefore, no HAP emission limits are applicable to this process.

A component of EP5 is considered a mixing container which is subject to the work practice item 8 in Table 4 of MACT WWWW. However, containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place. Therefore, since the surface area of the container is less than 500 square inches, it is exempt from the requirement to cover the mixer.

The acetone dip tanks are not subject to this subpart because they contain acetone which is not considered a HAP.

The tables to this subpart are included in this operating permit as attachments. These tables have been modified to only show the requirements that apply.

40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning
This subpart does not apply. The provisions of MACT T apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

The installation has two solvent dip tanks which use acetone. The installation sometimes uses methylene chloride in the casting machine cleaning process (EP6), however this process does not involve placing parts into a device or piece of equipment to remove soils. Therefore, this subpart does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.
Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, Compliance Assurance Monitoring (CAM)
The CAM rule applies to each pollutant specific emission unit that:
• Is subject to an emission limitation or standard, and
• Uses a control device to achieve compliance, and
• Has pre-control emissions that exceed or are equivalent to the major source threshold.

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

Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO\textsubscript{2} emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO\textsubscript{2} emissions were not included within this permit. The applicant is required to report the data directly to EPA if subject. The public may obtain CO\textsubscript{2} emissions data for this installation by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations
10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
While this rule applies, it is unlikely that particulate matter will emit beyond the installation’s property line in any significant quantities due to the nature and location of its emission points. As a result, no monitoring or recordkeeping is required.

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
This rule applies to the installation. EP9 Curing Oven is exempt due to being fueled solely by natural gas. EP7, EP8A, and EP8B are exempt due to not venting to the outdoors. Visible emissions are not expected from the other emission units of this installation due to having control devices and a potential to emit less than 0.5 lb/hr of particulate matter. As a result, monitoring and recordkeeping requirements were deemed unnecessary and were not included in this operating permit.

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 APCP'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

A public comment was received from Leslye E. Werner from EPA Region 7 on December 14, 2017. The comment as received in the letter is addressed below.

EPA Comment #1:
In the Other Air Regulations Determined Not to Apply to the Operating Permit section of the Statement of Basis (page SB-3) it is indicated in 10 CSR 10-6.261-Control of Sulfur Dioxide Emissions; that this rule is not applicable to the installation and goes on to provide the qualified exemptions. However, the Other Air Regulations Determined Not to Apply to the Operating Permit section in the Statement of Basis, does not explain the absence of potentially applicable requirements as found in 10 CSR 10-6.260-Restricition of Emission of Sulfur Compounds. 10 CSR 10-6.065(6)(C)1 says every operating permit issued shall contain all requirements applicable to the installation at the time of issuance. 10 CSR 10-6.020(A)54.A. defines applicable requirements to include any standard or requirement provided for in the implementation plan approved and promulgated by the United States Environmental Protection Agency. 10 CSR 10-6.260 is included in the EPA approved Missouri State Implementation Plan (SIP) and therefore is an applicable requirement to be included in this operating permit. EPA recognizes that Superior Home Products, Inc. may be exempt from the requirements of 10 CSR 10-6.260; much like the exemptions described in 10 CSR 10-6.261. However, EPA encourages MoDNR to recognize the applicability of 10 CSR 10-6.260 in either the Statement of Basis or as an applicable permit condition.

MoDNR Response to Comment #1:
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds has been added to the Statement of Basis. Like 10 CSR 10-6.261, 10 CSR 10-6.260 does not apply to the installation.
MAR  27  2018

Mr. Raymond Daggett
Superior Home Products, Inc.
P.O. Box 702
Wentzville, MO  63385

Re: Superior Home Products, Inc., 183-0131
Permit Number: OP2018-024

Dear Mr. Daggett:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kwj

Enclosures

c: PAMS File: 2016-11-013