Missouri Department of dnr.mo.gov
NATURAL RESOURCES
Michael L. Parson, Governor
Carol S. Comer, Director

SEP 1 0 2019

Mr. Fred Ducharme
TG Missouri Corporation
2200 Plattin Road
Perryville, MO 63775

Re: Part 70 Operating Permit Renewal
Installation ID: 157-0019, Permit Number: OP2019-030

Dear Mr. Ducharme:

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: 2012-10-002

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2019-030
Expiration Date: SEP 10 2024
Installation ID: 157-0019
Project Number: 2012-10-002

Installation Name and Address
TG Missouri Corporation
2200 Plattin Road
Perryville, MO 63775
Perry County

Installation Description:

TG Missouri Corporation manufactures plastic and metal automobile parts and accessories. Processes include plastic injection presses, painting operations, decorative chrome plating on plastic, assembly, aluminum and magnesium die casting, polyurethane reaction injection molding, metal stamping, air bag assembly, and numerous supporting types of equipment.

The installation is a major source of volatile organic carbons (VOCs) and an area source of hazardous air pollutants (HAPs).

SEP 10 2019
Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

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. Several individual emission points are consolidated into a single emission source as reflected in the permittee's submitted EIQs. Some individual emission points are divided between the two emission units tables of this section while using the same emission source ID to differentiate between which individual EP is subject to a limitation.

Emission Source	Description	Enforceable Control Device
EP-01 to EP-59[1]	Polyurethane Covering and Painting: (EP-13) PU Press 15 (EP-14) PU Press 16 (EP-15) PU Press 17 (EP-16) PU Press 18 (EP-17) PU Press 19 (EP-18) PU Press 20 (EP-19) PU Press 21 (EP-20) PU Press 22 (EP-21) PU Press 23 (EP-22) PU Press 24 (EP-23) PU Press 25 (EP-24) PU Press 26 (EP-25) PU Press 27 (EP-26) PU Press 28 (EP-27) PU Press 29 (EP-28) PU Press 32 (EP-29) PU Press 33 (EP-30) PU Press 34 (EP-31) PU Press 35 (EP-32) PU Press 36 (EP-33) PU Press 38 (EP-34) PU Press 39 (EP-35) PU Press 42 (EP-36) PU Press 43 (EP-37) PU Press 44 (EP-38) PU Press 45 (EP-39) PU Press 46 (EP-40) PU Press 47 (EP-41) PU Press 54 (EP-42) PU Press 55 (EP-43) PU Press 56 (EP-44) PU Press 57 (EP-45) PU Press 58 (EP-46) PU Press 59 (EP-47) PU Press 67 (EP-48) PU Press 68	FABRIC FILTER All different stacks, each has its own booth

[1] PU Presses 1-14 were dismantled, however, the EIQ still lists the emission point as EP-01 to EP-59.

Emission Source	Description	Enforceable Control Device
	(EP-49) PU Press 69 (EP-50) PU Press 70 (EP-51) PU Press 73 (EP-52) PU Press 74 (EP-53) PU Press 75 (EP-54) PU Press 76 (EP-55) PU Press 77 (EP-56) PU Press 78 (EP-57) PU Press 79 (EP-58) PU Press 80 (EP-59) PU Press 81	
EP-62 and EP-63	Paint Booths (P-8) Line: (EP-62) Paint Booth (EP-63) Paint Booth	
EP-80 to EP-82[2]	Building 6 Paint Booth (P-18 Service) Line: (EP-81) Building 6 Paint Booth (P-18) Service Manual (EP-82) Building 6 Paint Booth (P-18) – Drying (electric)	
EP-83	(3) Aluminum Die Cast Melting Furnaces (Electric)	
EP-84	Aluminum Die Casting	
EP-144 to EP-148[3]	Air Robotic Paint Booth (P-5 and P-6) Line: (EP-146) Air Robotic Paint Booth (P-5) (EP-147) Air Robotic Paint Booth (P-6) (EP-148) Paint Kitchen	
EP-155 to EP-162	Air Bag Robotic Paint Booth (P-14) Line: (EP-159) Air Bag Robotic Paint Booth (P-14)	
EP-163	Magnesium Die Casting and Magnesium Die Casting Furnace (electric)	
EP-167	Fluidized Bed Parts Cleaner (0.891 MMBtu/hr, natural gas)	
EP-171 to EP-183[3]	Robotic Paint Booth (P-9) Line: (EP-176) Robotic Paint Booth (P-9) (EP-177) Robotic Paint Booth (P-9)	
EP-193 to EP-196	Building 3 Paint (Three Axis Coating) Finish Booth (P-11) Line: (EP-193) Building 3 Paint (3 Axis Coating) Finishing Booth (P-11)	
EP-197 to EP-205	Robotic Paint Booth (P-12) Line: (EP-197) Paint Kitchen (EP-198) Spray Booth A (EP-199) Spray Booth B (EP-200) Air Flash (ventilation ducts)	
EP-234	PMF4 Chrome Etching	CD-234 (3-Stage Composite Mesh Pad Scrubber)
EP-235	PMF4 Hydrochloric Acid Catalyst Tank, 6,500 gal	CD-235 (Cross-flow Packed Bed Scrubber)

[2] EP-80 was dismantled.

[3] EP-144, EP-145, EP-179, and EP-180 are not currently at the installation. These emission units may have been individual coatings, which historically the Air Pollution Control Program (APCP) had made into individual emission points. Currently the APCP combines any coating usage under one emission source that does the coating (i.e., under a paint booth).

Emission Source	Description	Enforceable Control Device
EP-236	PMF4 Copper Plating	CD-236 (Cross-flow Packed Bed Scrubber)
EP-237	PMF4 Nickel Plating	CD-237a and CD-237b (Cross-flow Bed Scrubber w/Mist Eliminator)
EP-238	PMF4 Decorative Chrome Plating	CD-238 (3-Stage Composite Mesh Pad Scrubber)
EP-239	PMF4 Nitric Acid Exfoliate Tank	CD-239 (Packed Bed Scrubber w/Mist Eliminator)
EP-240	Kaizen Booth Paint System	CD-240 (Fabric Filter)
EP-241	P-23 Base Coat Booth Stack 1	CD-241 (Water Wall)
EP-243	P-23 Clear Coat Booth Stack 1	
EP-245	P-23 Cure Oven Exhaust (1.0 MMBTU/hr, natural gas)	
EP-246	P-23 Cooling Zone Exhaust	
EP-247	P-23 Paint Kitchen	
EP-248	P-25 Base Coat Booth Stack 1	CD-242 (Water Wall)
EP-249	P-25 Clear Coat Booth Stack 1	
EP-250	P-25 Cure Oven Exhaust (1.0 MMBtu, natural gas)	
EP-251	P-25 Cooling Zone Exhaust (ventilation with incoming filtered air which recirculates)	
EP-252	P-25 Paint Kitchen	
EP-254	Cummins 6CTA8.3-G2 Emergency Generator (250 KW, natural gas), installed 2004	
EP-255	Caterpillar 3306 Emergency Generator (150 KW, natural gas), installed 2003	

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. Several individual emission points are consolidated into a single emission source as reflected in the permittee's submitted EIQs. Some individual emission points are divided between the two emission units tables of this section while using the same emission source ID.

Emission Source	Description
EP-90 to EP-115	Natural Gas Space Heaters (<10 MMBtu/hr each, natural gas)
EP-116 to EP-125	Natural Gas Water Heaters (<10 MMBtu/hr each, natural gas)
EP-149 to EP-154	Air Bag Robotic Paint Booths (P-6) Line (EP-149) Setting Zone (EP-150) Setting Zone (EP-151) Oven (< 10 MMBtu/hr, natural gas) (EP-152) Oven (< 10 MMBtu/hr, natural gas) (EP-153) Cooling Zone (EP-154) Cooling Zone
EP-155 to EP-162	Air Bag Robotic Paint Booth (P-14) Line (EP-155) Power Wash (0.84 MMBtu/hr, natural gas)

Emission Source	Description
	(EP-156) Power Wash (0.3675 MMBtu/hr, natural gas) (EP-157) Paint Booth (EP-158) Dryer Oven (0.792 MMBtu/hr, natural gas) (EP-160) Paint Kitchen Storage (EP-161) Setting Zone (EP-162) Heat Zone Exhaust (1.0 MMBtu/hr, natural gas)
EP-171 to EP-183	Robotic Paint Booth (P-9) Line: (EP-171) Paint Kitchen (EP-172) Sludge Remover (EP-173) Clean Room (EP-174) Pre-Treatment (EP-175) Ionization (EP-178) Flash-off (EP-181) Infrared Dryer (electric) (EP-182) Cure Oven (5 MMBtu/hr, natural gas) (EP-183) Air Recirculation
EP-193 to EP-196	Building 3 Paint (Three Axis Coating) Finish Booth (P-11) Line: (EP-194) Cooling (EP-195) Oven (EP-196) Burner (5 MMBTU/hr natural gas)
EP-197 to EP-205[4]	Robotic Paint Booth (P-12) Line: (EP-201) IR Oven (EP-202) Burner (0.4 MMBTU/hr natural gas) (EP-203) Gas Heat Oven (natural gas) (EP-205) Cooling
EP-212 to EP-216	PB-20 Paint System (paint kitchen/storage, spray booths A & B, flash off tunnel, oven & cooling zone): (EP-212) Paint Kitchen (EP-213) Spray Booth A (EP-215) PB-20 Drying Oven (0.735 MMBtu/hr, natural gas) (EP-216) Cooling
EP-253	HCL Tank
-	(3) Chrome Boilers, (7.82 MMBtu/hr each, natural gas) (one is inactive)
-	Water Heater Evaporator (0.4 MMBtu/hr, natural gas)
ADH16	Flocking glue booth – 1 spray gun
ADH19	VF-6 Vacuformer glue booth – 1 spray gun
ADH21	Assy 908 glue booth – 1 spray gun

[4] EP-204 is no longer at the installation.

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 10-6.060, Construction Permits Required
Construction Permit 082018-014, issued August 29, 2018

Emission Limitation:

1) The permittee shall emit less than 10.0 tons of any individual HAP and less than 25.0 tons of any combination of HAPs from the entire installation in any rolling 12-month period. [Special Condition 2.A.1]

Monitoring/Recordkeeping:

1) The permittee shall develop and use an electronic database, electronic forms, or written forms to demonstrate compliance with the emission limitation by tracking on a monthly and rolling 12-month total basis. The database/forms shall contain at a minimum the information listed in Attachment A. [Special Condition 2.A.2]
2) The permittee shall maintain a complete set of safety data sheets (SDS) for all HAP emitting material used at the installation.
3) The permittee shall keep all records for no less than five years and make available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, 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.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060, Construction Permits Required
Construction Permit 122015-018, issued December 29, 2015

Operational Requirements:

1) The permittee shall keep the solvents, coatings, cleaning solutions, and acids in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent, coating, and acid containers used. [Special Condition 5]

Recordkeeping:

1) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW003

10 CSR 10-6.065, Operating Permits (Voluntary Limitation)

Emission Limitation:

1) The permittee shall not emit more than 386.83 tons of VOC from this installation in any rolling 12-month period.

Monitoring/Recordkeeping:

1) The permittee shall maintain an accurate record of VOC emissions from this installation. These records shall include monthly and cumulative 12-month VOC emission totals. The records shall be kept on Attachment B, or on any other equivalent form that contains the same information.
2) These records shall be kept on-site for a minimum of five years and shall be made immediately available to Department of Natural Resources' personnel upon request.
3) The permittee shall maintain a complete set of SDS for all VOC emitting materials used at the installation.

Reporting:

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, 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.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW004

10 CSR 10-6.060 Construction Permits Required
Construction Permit 012012-010, Issued January 17, 2012

Operational Limitation:

1) The permittee shall not inject, extrude, or mold more than 49,988 pounds of plastic per hour from the entire installation. [Special Condition 4.A]

Monitoring/Recordkeeping:

1) The permittee shall keep records sufficient to demonstrate compliance with this permit condition using Attachment L or an equivalent. [Special Condition 4.B]
2) The permittee shall keep all records for no less than five years and make available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001 10 CSR 10-6.060, Construction Permits Required Construction Permit 082002-019, issued August 13, 2002 Construction Permit 072017-007, issued July 11, 2017 Construction Permit 082018-014, issued August 29, 2018	
Emission Source	**Description**
EP-193, EP-194, EP-195	Three Axis Coating Booth (P-11)
EP-197, EP-198, EP-199, EP-200	Coating Line with Pallet Style Conveyor (P-12)
EP-241	P-23 Base Coat Booth Stack 1
EP-243	P-23 Clear Coat Booth Stack 1
EP-245	P-23 Cure Oven Exhaust
EP-246	P-23 Cooling Zone Exhaust
EP-247	P-23 Paint Kitchen
EP-248	P-25 Base Coat Booth Stack 1
EP-249	P-25 Clear Coat Booth Stack 1
EP-250	P-25 Cure Oven Exhaust
EP-251	P-25 Cooling Zone Exhaust
EP-252	P-25 Paint Kitchen

Emission Limitation:

1) The permittee shall emit less than the indicated amounts of VOCs in any rolling 12-month period for each group of emission sources listed in the table below. [082002-019: 1.A, 072017-007: 2.B.1, and 082018-014: 2.B.1]

Emission Source	VOC Limitation
EP-193, EP-194, & EP-195	Less than 40.0 tons VOC in any rolling 12-month period
EP-197, EP-198, EP-199, & EP-200	
EP-241	Less than 40.0 tons VOC in any rolling 12-month period
EP-243	
EP-245	
EP-246	
EP-247	
EP-248	Less than 40.0 tons VOC in any rolling 12-month period
EP-249	
EP-250	
EP-251	
EP-252	

Monitoring/Recordkeeping:

1) The permittee shall maintain an accurate record of monthly and rolling 12-month total VOC emissions. Attachment B or an equivalent form, such as an electronic form, shall be used to demonstrate compliance with these emission limitations. [082002-019: 1.D, 072017-007: 2.B.4, and 082018-014: 2.B.4]
2) The permittee shall keep all records for no less than five years and make available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, 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.
2) The permittee shall report any deviations from the 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 10-6.060, Construction Permits Required
Construction Permit 072017-007, issued July 11, 2017
Construction Permit 082018-014, issued August 29, 2018

Emission Source	Description
EP-241	P-23 Base Coat Booth Stack 1
EP-243	P-23 Clear Coat Booth Stack 1
EP-245	P-23 Cure Oven Exhaust
EP-246	P-23 Cooling Zone Exhaust
EP-247	P-23 Paint Kitchen
EP-248	P-25 Base Coat Booth Stack 1
EP-249	P-25 Clear Coat Booth Stack 1
EP-250	P-25 Cure Oven Exhaust
EP-251	P-25 Cooling Zone Exhaust
EP-252	P-25 Paint Kitchen

Emission Limitation:

1) The permittee shall emit less than the indicated amounts of fine particulate matter ($PM_{2.5}$) in any rolling 12-month period for each group of emission sources listed in the table below. [072017-007: 2.B.2 and 082018-014: 2.B.2]

Emission Source	$PM_{2.5}$ Limitation
EP-241	Less than 10.0 tons $PM_{2.5}$ in any rolling 12-month period
EP-243	
EP-245	
EP-246	
EP-247	
EP-248	Less than 10.0 tons $PM_{2.5}$ in any rolling 12-month period
EP-249	
EP-250	
EP-251	
EP-252	

Monitoring/Recordkeeping:

1) The permittee shall record the $PM_{2.5}$ emissions on a monthly and rolling 12-month total basis.
2) Attachment C or an equivalent form, such as an electronic form, shall be used to demonstrate compliance with these emission limitations. [072017-007: 2.B.4 and 082018-014: 2.B.4]
3) The permittee shall keep all records for no less than five years and make available immediately to any Missouri Department of Natural Resources' personnel upon request.
4) The permittee shall maintain a complete set of SDS for all spray-applied materials used by this equipment, indicating the solids content of the material.

Reporting:

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, 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.
2) The permittee shall report any deviations from the 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 10-6.060, Construction Permits Required
Construction Permit 082018-014, issued August 29, 2018

Emission Source	Description
EP-248	P-25 Base Coat Booth Stack 1
EP-249	P-25 Clear Coat Booth Stack 1
EP-250	P-25 Cure Oven Exhaust
EP-251	P-25 Cooling Zone Exhaust
EP-252	P-25 Paint Kitchen

Emission Limitation:

1) The permittee shall emit less than the Screening Model Action Level (SMAL) of each HAP in any rolling 12-month period from the emission units of this permit condition[5]. [Special Condition 2.B.3]

Monitoring/Recordkeeping:

1) The permittee shall maintain a complete set of SDS for all HAP-emitting material used at the installation.
2) The permittee shall maintain records of monthly and 12-monthly rolling total emissions of each individual HAP using Attachment E or an equivalent form [Special Condition 2.B.4]
3) The permittee shall keep all records for no less than five years and make available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, 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.

[5] See SMAL values at at http://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf

2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 004 10 CSR 10-6.060, Construction Permits Required Construction Permit 072017-007, issued July 11, 2017 Construction Permit 082018-014, issued August 29, 2018		
Emission Source	**Description**	**Control Device**
EP-241	P-23 Base Coat Booth Stack 1	CD-241 (Water Wall)
EP-243	P-23 Clear Coat Booth Stack 1	
EP-248	P-25 Base Coat Booth Stack 1	CD-242 (Water Wall)
EP-249	P-25 Clear Coat Booth Stack 1	

Operational Requirements:

1) The permittee shall control particulate matter emissions from the emission sources of this permit condition by using a water wall. [072017-007: 3.A and 082018-014: 3.A]
2) The permittee shall ensure all doors and windows of the booths are closed during operation. [072017-007: 4.A and 082018-014: 4.A]
3) The permittee shall operate and maintain the water wall in accordance with the manufacturer's specifications. The permittee shall maintain the operating pressure drop within the design conditions specified by the manufacturer's performance warranty. [072017-007: 3.B and 082018-014: 3.B]
4) The permittee shall equip the water wall with a pressure switch, which will automatically shut down the booth if the pressure is outside of the manufacturer's recommended operational range. [072017-007: 3.B and 082018-014: 3.B]
5) The permittee shall verify the proper operation of each paint booth with an air intake that is equipped with a pressure switch that will automatically shut down the booths if the makeup air is insufficient. [072017-007: 4.B and 082018-014: 4.B]

Monitoring/Recordkeeping:

1) The permittee shall inspect the water wall for complete coverage before each shift. [072017-007: 3.C and 082018-014: 3.C]
2) The permittee shall record the pressure drop across the water walls using Attachment G or equivalent.
3) The permittee shall maintain a copy of the water wall's manufacturer's performance warranty on site. [072017-007: 3.D and 082018-014: 3.D]
4) The permittee shall maintain an operating and maintenance log for the control device using Attachment H, or an equivalent, which shall include the following: [072017-007: 3.E and 082018-014: 3.E]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [072017-007: 3.E.1 and 082018-014: 3.E.1]
   b) Maintenance activities with inspection schedule, repair actions, and replacements, etc. [072017-007: 3.E.2 and 082018-014: 3.E.2]
5) The permittee shall demonstrate that each paint booth was constructed according to their construction permits by keeping a record of the following design parameters: [072017-007: 4.D and 082018-014: 4.D]
   a) The minimum recommended face velocity. [072017-007: 4.D.a and 082018-014: 4.D.a]

b) Engineering drawings which demonstrate that the spray booth was designed to meet the minimum face velocity. [072017-007: 4.D.b and 082018-014: 4.D.b]

6) The permittee shall keep all records for no less than five years and make available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 005 10 CSR 10-6.060, Construction Permits Required Construction Permit 122015-018, issued December 29, 2015		
Emission Source	**Description**	**Control Device**
EP-240	Kaizen Booth Paint System	CD-240 (Fabric Filter)

Operational Requirements:

1) The permittee shall control emissions from the Kaizen Booth Paint Gun using a booth and filter media. Only one spray gun may be used at any one time. [Special Condition 3.A]
2) The filter media shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 3.B]
3) The filter media 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 the Department of Natural Resources' employees may easily observe them. [Special Condition 3.B]
4) Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 3.C]
5) The operating pressure drop of the filter media shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 3.D]

Monitoring/Recordkeeping:

1) The permittee shall monitor and record the operating pressure drop across the filter media at least once daily during operation using Attachment G or an equivalent. [Special Condition 3.D]
2) The permittee shall maintain an operating and maintenance log for the filter media, using Attachment H or an equivalent, which shall include the following: [Special Condition 3.E]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [Special Condition 3.E.1]
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 3.E.2]
3) The permittee shall keep a copy of the filter media's manufacturer's performance warranty on-site at all times.
4) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 006A 10 CSR 10-6.060, Construction Permits Required Construction Permit 082014-016, issued July 26, 2014		
Emission Source	**Description**	**Control Device**
Composite Mesh Pad Controlled Emission Units		
EP-234	PMF4 Chrome Etching: controlled by a 68,000 cfm three-stage composite mesh pad system; MHDR = 2,932,500 dscf and 3,000 amps-hr	CD-234 (3-Stage Composite Mesh Pad Scrubber)
EP-238	PMF4 Decorative Chrome Plating: controlled by a 60,000 cfm three-stage composite mesh pad system; MHDR = 3,399,000 dscf and 3,663 amps-hr	CD-238 (3-Stage Composite Mesh Pad Scrubber)

Operational Requirements:

1) The permittee shall control chromium emissions from the emission units listed in this permit condition using a composite mesh system. [Special Condition 3.A.]
2) Each composite mesh-pad system and any related instrumentation or equipment shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 3.B.]
3) Each composite mesh-pad system shall be equipped with a gauge or meter that indicates air pressure drop across the control device. These gauges and meters shall be located in such a way they may be easily observed by Department of Natural Resources' personnel. [Special Condition 3.B.]
4) The operating pressure drop of the mesh-pad system shall be maintained within the specifications of MACT Subpart N §63.343. [Special Condition 3.C.]
5) The permittee shall determine the outlet chromium concentration according to MACT Subpart N §63.343[6]. [Special Condition 3.D.]

Monitoring/Recordkeeping:

1) The permittee shall maintain a copy of the manufacturer's performance warranties for the control devices, which shall be kept on site, to demonstrate removal efficiency. [Special Condition 7.D.]
2) The permittee shall monitor and record the operating pressure drop across each composite mesh-pad system at least once daily during operation using Attachment G or an equivalent. [Special Condition 3.C.]
3) The permittee shall maintain an operating and maintenance log for the composite mesh-pad systems and capture device using Attachment H or an equivalent, which shall include the following: [Special Condition 3.E. and 7.C.]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; [Special Condition 3.E.1 and 7.C.1]
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and[Special Condition 3.E.2 and 7.C.2]
   c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection. Either paper copy or electronic formats are acceptable. [Special Condition 3.E.3]

[6] The permittee determined the outlet chromium concentration to be 0.00087 mg/dscm or 3.8×10^{-7} gr/dscf.

4) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 006B
10 CSR 10-6.060, Construction Permits Required
Construction Permit 082014-016, issued July 26, 2014

Emission Source	Description	Control Device
EP-234	PMF4 Chrome Etching	CD-234 (3-Stage Composite Mesh Pad Scrubber)
EP-235	PMF4 Hydrochloric Acid Catalyst	CD-235 (Cross-flow Packed Bed Scrubber)
EP-236	PMF4 Copper Plating	CD-236 (Cross-flow Packed Bed Scrubber)
EP-237	PMF4 Nickel Plating	CD-237a and CD-237b (Cross-flow Bed Scrubber w/Mist Eliminator)
EP-238	PMF4 Decorative Chrome Plating	CD-238 (3-Stage Composite Mesh Pad Scrubber)
EP-239	PMF4 Nitric Acid Exfoliate	CD-239 (Packed Bed Scrubber w/Mist Eliminator)

Operational Limitation:

1) The permittee shall maintain 100 percent capture efficiency and at least 90% removal efficiency for each emission source of these emission units. [Special Condition 7.A.]

Monitoring/Recordkeeping:

1) The permittee shall demonstrate capture efficiency according to the procedures of EPA Test Method 204, *Criteria for and Verification of a Permanent or Temporary Total Enclosure*, set forth in 40 CFR Part 51, Appendix M. [Special Condition 7.B.]
2) The permittee shall maintain an operating and maintenance log associated with each capture device using Attachment H or an equivalent which shall include the following: [Special Condition 7.C.]
   a) Incidents of malfunction, with impact on emissions, time, date and duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3) The permittee shall maintain a copy of the manufacturer's performance warranties for the control devices, which shall be kept on site, to demonstrate removal efficiency. [Special Condition 7.D.]
4) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 007 10 CSR 10-6.060, Construction Permits Required Construction Permit 082014-016, issued July 26, 2014		
Emission Source	**Description**	**Control Device**
EP-235	PMF4 Hydrochloric acid catalyst: Controlled by a 32,000 cfm horizontal cross-flow wet packed bed scrubber with mist eliminator; MHDR = 94.3 ft^2	CD-235 (Cross-Flow Packed Bed Scrubber)
EP-236	PMF4 Copper Plating: Controlled by a 72,000 cfm horizontal cross-flow wet packed bed scrubber with mist eliminator; MHDR = 5,310,000 dscf	CD-236 (Cross-Flow Packed Bed Scrubber)
EP-237	PMF4 Nickel Plating: Controlled by a 44,000 cfm horizontal cross-flow wet packed bed scrubber with mist eliminator and a 67,000 cfm horizontal cross-flow wet packed bed scrubber with mist eliminator; MHDR = 27,747 amps-hr	CD-237a and CD-237b (Cross Flow Bed Scrubber w/Mist Eliminator)
EP-239	PMF4 Nitric Acid Exfoliate: Controlled by a 58,000 cfm horizontal cross-flow wet packed bed scrubber with mist eliminator; MHDR = 138 ft^2	CD-239 (Packed Bed Scrubber w/Mist Eliminator)

Operational Limitations:

1) The permittee shall control emissions from these emission units using a packed bed scrubber with mist eliminator. [Special Condition 6.A.]
2) Each packed bed scrubber with mist eliminator and any related instrumentation or equipment shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 6.B.]
3) Each packed bed scrubber with mist eliminator shall be equipped with a gauge or meter that indicates the solution pH and air pressure drop across the control device. These gauges and meters shall be located in such a way they may be easily observed by Department of Natural Resources' personnel. [Special Condition 6.B.]
4) The permittee shall maintain the pH within the specifications of the manufacturer's performance warranty, which shall be kept on site. [Special Condition 6.C.]
5) The permittee shall maintain the operating pressure drop within the specifications of the manufacturer's performance warranty. [Special Condition 6.D.]

Monitoring/Recordkeeping:

1) The permittee shall maintain a copy of the manufacturer's performance warranties for the control devices and packed bed scrubber with mist eliminator, which shall be kept on site, to demonstrate removal efficiency. [Special Condition 6.D.]
2) The permittee shall monitor and record the solution pH of each packed bed scrubber with mist eliminator at least once daily during operation using Attachment I or an equivalent. [Special Condition 6.C.]
3) The permittee shall monitor and record the operating pressure drop across each packed bed scrubber with mist eliminator at least once daily during operation using Attachment G or an equivalent. [Special Condition 6.D.]
4) The permittee shall maintain an operating and maintenance log for each packed bed with mist eliminator and capture device using Attachment H or an equivalent, which shall include the following: [Special Condition 6.E. and 7.C.]

a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [Special Condition 6.E.1 and 7.C.1]
b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 6.E.2 and 7.C.2]

5) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 009
10 CSR 10-6.060, Construction Permits Required
Construction Permit 122015-018, issued December 29, 2015
Construction Permit 072017-007, issued July 11, 2017

Emission Source	Description
Blackout Paint Booth System	
EP-240	Kaizen Booth Paint System
EP-241	P-23 Base Coat Booth Stack 1
EP-243	P-23 Clear Coat Booth Stack 1
EP-245	P-23 Cure Oven Exhaust
EP-246	P-23 Cooling Zone Exhaust
EP-247	P-23 Paint Kitchen

Alternative Coating Procedure:

1) When considering using an alternative coating in paint booths that is different than a material listed in Attachment D1, the permittee shall calculate the potential emissions of each individual HAP in the alternative material. [122015-018: 4.A., and 072017-007: 5.A.]
2) The permittee shall also calculate the potential emissions of all VOCs from EP-240 from the alternative material. [122015-018: 4.A.]
3) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material if the potential individual HAP emissions for the alternative material are equal to or greater than the SMAL for any chemical listed in the SMAL Table[5]. [122015-018: 4.B., and 072017-007: 5.B.]
4) The permittee shall seek approval from the Air Pollution Control Program before use the alternative material if the potential combined VOC emissions for the alternative material from EP-240 exceed 13.55 tons per year. [122015-018: 4.B.]

Monitoring/Recordkeeping:

1) The permittee shall maintain a complete set of SDS for all HAP and VOC-emitting material used at the installation.
2) The permittee shall use Attachment D2 and Attachment D3, or equivalent forms, to show compliance with any alternative materials. [122015-018: 4.A., and 072017-007: 5.C.]
3) The permittee shall keep all records for no less than five years and make available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 010 10 CSR 10-6.060, Construction Permits Required Construction Permit 082002-019, issued August 13, 2002	
Emission Source	**Description**
EP-197, EP-198, EP-199, & EP-200	Coating Line with Pallet Style Conveyor (P-12)

Emission Limitation:

1) The permittee shall not emit hexamethylene diisocyanate (HDI) in excess of 0.02 tons from the P-12: Coating Line in any rolling 12-month period. [Special Condition 1.C.]

Monitoring/Recordkeeping:

1) The permittee shall use Attachment F or an equivalent form to demonstrate compliance with the HDI emission limitation by tracking monthly and rolling 12-month total emissions of HDI. [Special Condition 1.D.]
2) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used in these paint booths. [Special Condition 1.D.]

Reporting:

1) The permittee shall report to the Air Pollution Control Program's Compliance / Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after the end of the month during which the records indicate the emission limitation has been exceeded. [082002-019: 1.E.]
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 011 10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart N – National Emission Standards for Chromium Emissions from Hard and Decorative Chrome Electroplating and Chromium Anodizing Tanks	
Emission Source	**Description**
EP-238	PMF4 Decorative Chrome Plating: controlled by a 60,000 cfm three-stage composite mesh pad system; MHDR = 3,399,000 dscf and 3,663 amp-hrs

Emission Limitations:

1) The permittee shall comply with one of the following emission limitations: [§63.343(a)(1)]
   a) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.007 mg/dscm (3.1×10^{-6} gr/dscf) for all existing decorative chromium electroplating tanks using a chromic acid bath and all existing chromium anodizing tanks; or [§63.342(d)(1)]

b) The emission limitations in §63.342 apply during tank operation as defined in §63.341, and during periods of startup and shutdown as these are routine occurrences for affected sources subject to Subpart N. [§63.342(b)(1)]

Work Practice Standards:

1) The permittee shall implement the housekeeping procedures specified in Table 2 of §63.342. [§63.343(a)(8)]
2) The permittee is subject to the following work practice standards:
   a) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the required operation and maintenance plan.
   b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the required operation and maintenance plan.
   c) Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
3) The permittee shall perform the following tasks at least once per quarter: [Table 1 of §63.342]
   a) Visually inspect device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
   b) Visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
   c) Visually inspect ductwork from tank to the control device to ensure there are no leaks.
4) The permittee shall perform wash down of the composite mash-pads in accordance with the manufacturers' recommendations. [Table 1 of §63.342 – Summary of Work Practice Standards]

Operation and Maintenance Plan Requirements:

1) The permittee shall implement the housekeeping procedures specified in Table 2 of §63.342.
2) The permittee shall maintain an operation and maintenance plan. The plan shall be incorporated by reference into the source's title V permit. The plan shall include the elements listed under §63.342(f)(3)(i)(A) through (F). [§63.342(f)(3)(i)]
3) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. [§63.342(f)(3)(ii)]
4) If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by §63.342(f)(3)(i), the permittee shall record the actions taken for that event and shall report by phone such actions within two working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Director. [§63.342(f)(3)(iv)]
5) The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Director for the life of the affected source or until the source is no longer subject to the provisions of Subpart N. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the

operation and maintenance plan on record to be made available for inspection, upon request, by the Director for a period of five years after each revision to the plan. [§63.342(f)(3)(v)]

6) To satisfy the requirements of §63.342(f)(3), the permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration plans, or other existing plans, provided the alternative plans meet the requirements of §63.342. [§63.342(f)(3)(vi)]

Monitoring:

1) The permittee shall demonstrate continuous compliance by monitoring and recording the pressure drop across the composite mesh-pad system once each day that any affected source is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ± 2 inch of water column of pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests. [§63.343(c)(1)(ii)]
2) The permittee may repeat the performance test and establish as a new site-specific operating parameter for the pressure drop across the composite mesh-pad system according to the requirements in §63.343(C)(1)(i) or (ii). To establish a new site-specific operating parameter for pressure drop, the permittee shall satisfy the requirements specified in §63.343(c)(1)(iii)(A) through (D). [§63.343(c)(1)(iii)]
3) The requirement to operate a composite mesh-pad system within the range of pressure drop values established under §63.343(c)(1)(i) through (iii) does not apply during automatic wash down cycles of the composite mesh-pad system. [§63.343(c)(1)(iv)]

Recordkeeping:

1) The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Director for the life of the affected source or until the source is no longer subject to the provisions of Subpart N. In addition, if the operation and maintenance is revised, the permittee shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Director for a period of five years after each revision to the plan. [§63.342(f)(3)(v)]
2) The permittee shall fulfill all recordkeeping requirements outlined in §63.346(b) and in the General Provisions to 40 CFR Part 63.11509(f), according to the applicability of 40 CFR Part 63 Subpart A as identified in Table 1 of 40 CFR 63 Subpart N. [§63.346(a)]
3) All records shall be maintained for five years in accordance with §63.10(b)(1). [§63.346(c)]

Reporting:

1) If actions are taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance with the Director. [§63.342(f)(3)(iv)]
2) The permittee shall fulfill all reporting requirements outlined in the General Provisions to 40 CFR Part 63, according to the applicability of 40 CFR Part 63 Subpart A. [§63.347(a)]
3) *Ongoing Compliance Status Reports for Major Sources.*
   a) The permittee shall submit a summary report to the Director to document the ongoing compliance status of the affected source. The report shall contain the information identified in §63.347(g)(3) shall be submitted semiannually except when:

i) The Director determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or
ii) The monitoring data collected by the permittee in accordance with §63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance reports shall be submitted quarterly until a request to reduce frequency under §63.347(g)(2) is approved. [§63.347(g)(1)]

b) *Request to reduce frequency of ongoing compliance status reports.* If required to submit ongoing compliance reports on a quarterly (or more frequent basis), the permittee may reduce the frequency or reporting to semiannual if all of the conditions of §63.347(g)(2) are met. [§63.347(g)(2)]

c) *Contents of ongoing compliance status reports.* For compliance monitoring which is required in accordance with §63.343(c), the permittee shall prepare a summary report to document the ongoing compliance status of the source. The report must contain the information listed under 63.347(g)(3). [§63.347(g)(3)]

4) The permittee shall submit all reports to the Air Pollution Control Program's Compliance and Enforcement Section, 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.
5) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 012

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart WWWWWW – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

Emission Source	Description
EP-237	PMF4 – Nickel Plating: Controlled by a 44,000 cfm horizontal cross-flow wet packed bed scrubber with mist eliminator and a 67,000 cfm horizontal cross-flow wet packed bed scrubber with mist eliminator; MHDR = 27,747 amps-hr

Management Practices:

1) The permittee shall implement the following management practices for EP-237: [§63.11507(g)]
   a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements; [§63.11507(g)(1)]
   b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable; [§63.11507(g)(2)]
   c) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as applicable; [§63.11507(g)(3)]
   d) Use tank covers, if already owned and available at the facility, whenever practicable; [§63.11507(g)(4)]
   e) Minimize or reduce heating of process tanks, as applicable (e.g., when doing so would not interrupt production or adversely affect part quality); [§63.11507(g)(5)]
   f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable; [§63.11507(g)(6)]

g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable; [§63.11507(g)(7)]
h) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable; [§63.11507(g)(8)]
i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic wash downs, as practicable; [§63.11507(g)(9)]
j) Minimize spills and overflow of tanks, as practicable; [§63.11507(g)(10)]
k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable;
l) Perform regular inspections to identify leaks and other opportunities for pollution prevention. [§63.11507(g)(12)]

Monitoring:

1) The permittee must satisfy the requirements specified below: [§63.11508(d)]
   a) The permittee must always operate and maintain the affected source, including air pollution control equipment. [§63.11508(d)(1)]
   b) The permittee must prepare an annual compliance certification according to the requirements specified in §63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review. [§63.11508(d)(2)]
   c) The permittee must operate and maintain the control system according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(i)]
   d) Following any malfunction or failure of the capture or control devices to operate properly, the permittee must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions. [§63.11508(d)(4)(ii)]
   e) The permittee must state in the annual certification whether or not the control system was operated and maintained according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(iii)]
   f) The permittee must record the results of all control system inspections, deviations from proper operation, and any corrective action taken. [§63.11508(d)(4)(iv)]
   g) The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11508(d)(4)(v)]

Recordkeeping:

1) The permittee shall keep a copy of any Initial Notification and Notification of Compliance Status that the permittee submitted and all documentation supporting those documentation.[63.11509(e)]
2) The permittee shall keep each record for a minimum of five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. 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) of the General Provisions to Part 63.11509(f). The permittee may keep the records offsite for the remaining three years.

Reporting:

1) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with

the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

PERMIT CONDITION 013 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	
Emission Source	**Description**
EP-01 to EP-59	Polyurethane Covering and Painting
EP-62 and EP-63	Paint Booths (P-8) Line (EP-62) Paint Booth (EP-63) Paint Booth
EP-80 to EP-82	Building 6 Paint Booth (P-18 Service) Line (EP-81) Building 1 Paint Booth (P-18) Service Manual
EP-144 to EP-148	Air Robotic Paint Booth (P-5 and P-6) Line: (EP-146) Air Robotic Paint Booth (P-5) (EP-147) Air Robotic Paint Booth (P-6) (EP-148) Paint Kitchen
EP-155 to EP-162	(EP-159) Air Bag Robotic Paint Booth (P-14)
EP-171 to EP-183	(EP-176) Robotic Paint Booth (P-9) (EP-177) Robotic Paint Booth (P-9)
EP-197 to EP-205	Robotic Paint Booth (P-12) Line: (EP-198) Spray Booth A (EP-199) Spray Booth B
EP-212 to EP-216	PB-20 Paint System (paint kitchen/storage, spray booths A & B, flash off tunnel, oven & cooling zone) (EP-212) Paint Kitchen (EP-213) Spray Booth A (EP-214) Spray Booth B
EP-234	PMF4 Chrome Etching
EP-236	PMF4 Copper Plating
EP-237	PMF4 Nickel Plating
EP-238	PMF4 Decorative Chrome Plating
EP-240	Kaizen Booth Paint System
EP-241	P-23 Base Coat Booth Stack 1
EP-243	P-23 Clear Coat Booth Stack 1
EP-248	P-25 Base Coat Booth Stack 1
EP-249	P-25 Clear Coat Booth Stack 1

Note: All emission units are located inside buildings, therefore only one observation per building is required.

Emission Limitation:

1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
   a) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]

2) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

1) Monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
      ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
3) Observations are only required when the emission units are operating and when the weather conditions allow.
4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Recordkeeping:

1) The permittee shall maintain records of all observation results for each emission unit using Attachment K1 and Attachment K2 or equivalent forms.
2) The permittee shall retain all records for a minimum of five years and make these records available within a reasonable period of time for inspection to the Department of Natural Resources' personnel upon request.

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 days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 014

10 CSR 10-6.065, Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Emission Source	Description
EP-254	Cummins 6CTA8.3-G2 Emergency Generator (250 KW, natural gas, installed 2004)
EP-255	Caterpillar 3306 Emergency Generator (150 KW, natural gas, installed 2003)

Operational Limitations:

1) The permittee shall comply with the following requirements[7]: [§63.6603(a) and Table 2d to 40 CFR Part 63, Subpart ZZZZ]
   a) Change oil and filter every 500 hours of operation or annually, whichever comes first;[8]
   b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

General Compliance:

1) The permittee shall be in compliance with operating limitations and other requirements in this permit condition at all times. [§63.6605(a)]
2) The permittee shall operate and maintain these emergency generators in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]
3) The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]

[7] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d to Subpart ZZZZ of 40 CFR Part 63, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

[8] Sources have the option to utilize an oil analysis program as described in §63.6625(j) in order to extend the specified oil change requirement in Table 2d to Subpart ZZZZ of 40 CFR Part 63.

Continuous Compliance:

1) The permittee shall demonstrate continuous compliance with each operational limitation of this permit condition according to methods specified below: [§63.6640(a) and Table 6 to 40 CFR Part 63, Subpart ZZZZ]
   a) Operating and maintaining the emergency generator engine according to the manufacturer's emission-related operation and maintenance instructions; or
   b) The permittee may develop and follow their own maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2) The permittee shall operate the emergency generator engine according to the following requirements: [§63.6640(f)]
   a) There is no time limit on the use of emergency generator engine in emergency situations. [§63.6640(f)(1)]
   b) The permittee may operate the emergency generator engine for the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
      i) The emergency generator engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency generator engine beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
   c) Emergency generator engines located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in §63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

General Provisions:

1) The permittee shall comply with the applicable provisions in Table 8 to 40 CFR Part 63, Subpart ZZZZ for 40 CFR Part 63 Subpart A. [§63.6665]

Recordkeeping:

1) The permittee shall keep the records described in §63.6655(a)(1), (a)(2) and (a)(5). [§63.6655(a)]
   a) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6650(a)(1)]
   b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
   c) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b). [§63.6655(a)(5)]

2) The permittee shall keep the records required in Table 6 to 40 CFR Part 63, Subpart ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
3) The permittee shall keep records of the maintenance conducted on the emergency generator engine in order to demonstrate that the permittee operated and maintained the emergency generator engine according to the permittee's own maintenance plan. [§63.6655(e)(2)]
4) The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§63.6655(f)]
5) The permittee's records shall be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
6) 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. [§63.6660(b)]
7) The permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Reporting:

1) The permittee shall report each instance in which they did not meet each operating limitation in Table 2d and Table 8 to 40 CFR Part 63, Subpart ZZZZ that applies. These instances are deviations from the operating limitations in 40 CFR Part 63, Subpart ZZZZ. These deviations shall be reported according to the requirements in §63.6650. [§63.6640(b), (e)]
2) The permittee shall submit applicable reports as specified in §63.6650 to theMissouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, U.S. EPA Region 7, 11201 Renner Blvd., Lenexa, Kansas 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or to AirComplianceReporting@dnr.mo.gov until such time as MoDNR is delegated authority of 40 CFR Part 63, Subpart ZZZZ. Afterwards, reports and certifications shall be submitted only to MoDNR.
3) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 015

10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(5)(C)1. Voluntary Limitation(s)

Emission Unit	Description	Control Device
EP-144 to EP-148	(EP-146) Air Robotic Paint Booth (P-5) (EP-147) Air Robotic Paint Booth (P-5)	Water Wall (≥95%)
EP-155 to EP-162	(EP-159) Air Bag Robotic Paint Booth (P-7)	Water Wall (≥95%)
EP-171 to EP-183	(EP-176) Robotic Paint Booth (P-9) (EP-177) Robotic Paint Booth (P-9)	Water Wall (≥95%)

Operating Limitation:

1) The permittee shall operate a water wall control device at all times when these units are in operation.
2) The permittee shall operarate and maintain the water wall in accordance with the manufacturer's specifications.

Monitoring/Recordkeeping:

1) The permittee shall monitor and record the pressure drop across the water wall at least once every 24 hours that the device is in operation. The pressure drop shall be maintained within the normal operating range indicated by the manufacturer's specifications.
2) The permittee shall monitor and record the water wall pH at least once every 24 hours that the device is in operation. The pH shall be maintained within the normal operating range indicated by the manufacturer's specifications.
3) The permittee shall maintain a copy of the water wall manufacturer's specifications on site.
4) The permittee shall maintain an operating and maintenance log for the water curtains which shall include the following:
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair action, and replacements, etc. (see Attachment D)

Reporting:

1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

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 permittee fails to comply with the conditions or any provisions of the permit.

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

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

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

10 CSR 10-6.060 Construction Permits Required
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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.

Monitoring:

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

1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
2) Should no violation of this regulation be observed during this period then-
   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
   c) Should no violation of this regulation be observed during this period then-
      i) The permittee may observe once per month.
      ii) If a violation is noted, monitoring reverts to weekly.
3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment M, or its equivalent, noting the following:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
      ii) 10 CSR 10-6.040, "Reference Methods";
      iii) 10 CSR 10-6.070, "New Source Performance Standards";
      iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

Permit Duration and Extension of Expired Permits
10 CSR 10-6.065(5)(C)1.B, 10 CSR 10-6.065(5)(E)3.C
This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

General Record Keeping and Reporting Requirements
10 CSR 10-6.065(5)(C)1.C
1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
   b) The permittee shall submit a report of all required monitoring by:
      i) 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.

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

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

Severability Clause
10 CSR 10-6.065(5)(C)1.F

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.

General Requirements
10 CSR 10-6.065(5)(C)1.G

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(5)(C)1.

Incentive Programs Not Requiring Permit Revisions
10 CSR 10-6.065(5)(C)1.H
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.

Reasonably Anticipated Operating Scenarios
10 CSR 10-6.065(5)(C)1.I
There are no reasonably anticipated operating scenarios.

Compliance Requirements
10 CSR 10-6.065(5)(C)3
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.

Permit Shield
10 CSR 10-6.065(5)(C)6

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.

Emergency Provisions
10 CSR 10-6.065(5)(C)7

1) An emergency or upset as defined in 10 CSR 10-6.065(5)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Operational Flexibility
10 CSR 10-6.065(5)(C)8

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

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

Off-Permit Changes
10 CSR 10-6.065(5)(C)9

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(5)(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.

Responsible Official
10 CSR 10-6.020(2)(R)34
The application utilized in the preparation of this permit was signed by Randy Georger, Vice President Safety Systems. On October 19, 2017, the Air Pollution Control Program was informed that Fred Ducharme, Senior General Manager is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the permittee 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 permittee to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

Reopening-Permit for Cause
10 CSR 10-6.065(5)(E)6
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.

Statement of Basis
10 CSR 10-6.065(5)(E)1.C
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
HAP Emissions Tracking Instructions

The permittee shall develop and use an electronic database, electronic forms, or written forms to demonstrate compliance with the emission limitation of Permit Condition PW001 (Construction Permit 082018-014). The database/forms shall contain at a minimum the following information: [Special Condition 2.A.2]

1) Installation name [Special Condition 2.A.2)a]
2) Installation ID [Special Condition 2.A.2)b]
3) Permit number [Special Condition 2.A.2)c]
4) Current month [Special Condition 2.A.2)d]
5) Current 12-month date range [Special Condition 2.A.2)e]
6) Each emission unit that emits HAP. [Special Condition 2.A.2)f]
7) Monthly throughput for each emission unit. [Special Condition 2.A.2)g]
8) Emission unit's respective emission factors, and source. [Special Condition 2.A.2)h]
    a) For coating/washing/solvent/cleaner operations EP-15 to EP-59, EP-62, EP-63, EP-81, EP-146, EP-147, EP-149, EP-150, EP-155, EP-156, EP-157, EP-159, EP-167, EP-172, EP-176, EP-177, EP-193, EP-198, EP-199, EP-213, EP-214, EP-217, EP-226, EP-240, EP-241, EP-243, EP-248, and EP-249:
        i) Record the monthly usage rate (tons) of each coating material during SSM periods.
        ii) Record the monthly usage rate (tons) of each coating material during controlled periods.
        iii) Volatile HAP emissions, except HDI:
            (1) Obtain the individual HAP content (wt%) from the most recent Certified Product Data Sheet (CPDS) or SDS.
            (2) Multiply each individual HAP content (wt%) by the monthly usage rate (tons) to obtain the monthly individual HAP emissions (tons).
            (3) For HDI, multiply the monthly usage rate (tons) by the HDI content (wt%) by an emission factor of 0.076 tons HDI per ton of HDI sprayed to obtain the monthly HDI emissions (tons).
        iv) Particulate HAPs:
            (1) Obtain the individual HAP content (wt%) from the SDS for the material.
                (a) For EP-241, EP-243, EP-248, and EP-249:
                    (i) Multiply the individual HAP content by the monthly usage rate (tons) during SSM periods by 80% to obtain the monthly individual HAP SSM emissions. (Where 80% = 1 - 20% transfer efficiency)
                    (ii) Multiply the individual HAP content by the monthly usage rate (tons) during controlled periods by 4% the obtain the monthly individual HAP controlled emissions. [Where 4% = (1 - 20% transfer efficiency) x (100% capture efficiency) x (1 - 95% water wall control efficiency)]
                    (iii) Sum the monthly individual HAP SSM emissions and monthly individual HAP controlled emissions to obtain the total monthly emissions for the emissions unit.
                (b) For EP-240:
                    (i) Multiply the individual HAP content by the monthly usage rate (tons) during SSM periods by 80% to obtain the monthly individual HAP SSM emissions. (Where 80% = 1 - 20% transfer efficiency)
                    (ii) Multiply the individual HAP content by the monthly usage rate (tons) during controlled periods by 8% the obtain the monthly individual HAP controlled emissions. [Where 8% = (1 - 20% transfer efficiency) x (100% capture efficiency) x (1 - 90% filter control efficiency)]
                    (iii) Sum the monthly individual HAP SSM emissions and monthly individual HAP controlled emissions to obtain the total monthly emissions for the emissions unit.

(c) For EP-15 to EP-59, EP-62, EP-63, EP-81, EP-146, EP-147, EP-149, EP-150, EP-157, EP-159, EP-167, EP-176, EP-177, EP-193, EP-198, EP-199, EP-213, EP-214, and EP-226 (the controls on these emission units are not practically enforceable and cannot be used when calculating HAP emissions):
(i) Multiply the individual HAP content by the monthly usage rate (tons) by 80% to obtain the monthly individual HAP emissions. (Where 80% = 1 - 20% transfer efficiency)

b) For aluminum melting operations EP83:
i) Record the monthly aluminum melting rate (tons).
ii) Multiply the monthly aluminum melting rate (tons) by the HAP emission factor (lb/ton) by 0.0005 (ton/lb) to obtain the monthly HAP emissions (tons). Where the HAP emission factors are: (obtained from EPA-HQ-OAR-2010-0544-0149)
(1) 0.4 lbs combined HAP/ton aluminum melted

c) For aluminum die casting operations EP-84:
i) Record the monthly aluminum casting rate (tons).
ii) Multiply the monthly aluminum casting rate (tons) by the HAP emission factor (lb/ton) by 0.0005 (ton/lb) to obtain the monthly HAP emissions (tons). Where the HAP emission factors are: [obtained from Emissions Measurement Team Casting Emission Reduction Program's "Foundry Process Emission Factors: Baseline Emissions from Automotive Foundries in Mexico" (January 1999)]
(1) 8.13E-3 lbs combined HAP/ton metal cast

d) For paint mixing operations EP-148, EP-160, EP-171, EP-197, EP-212, EP-247, and EP-252
i) Record the monthly tonnage mixed of each material.
ii) Record the individual HAP content (wt%) of each material.
iii) Multiply the monthly tonnage mixed by the individual HAP content (wt%) by 30 lb/ton by 0.0005 ton/lb to obtain the monthly HAP emissions (tons). [Where 30 lb/ton is the VOC emission factor obtained from AP-42 Section 6.4 "Paint & Varnish" (May 1983)]

e) For chromium operations, EP-234 and EP-238:
i) Record the monthly usage rate (AMP) during SSM periods.
ii) Record the monthly usage rate (AMP) during controlled periods.
iii) Multiply the monthly controlled usage rate (AMP) by 5.43E-8 lb/AMP by 0.0005 ton/lb to obtain the monthly controlled chromium emission rate (tons). [Obtained from AP-42 Section 12.20 "Electroplating" (July 1996)]
iv) Multiply the monthly SSM usage rate (AMP) by 1.71E-5 lb/AMP by 0.0005 ton/lb to obtain the monthly SSM chromium emissions (tons). [Obtained from AP-42 Section 12.20 "Electroplating" (July 1996)]
v) Sum the monthly controlled and SSM emissions to obtain the total chromium emissions.

f) For external natural gas combustion operations EP-83, EP-90 to EP-125, EP-151, EP-152, EP-155, EP-156, EP-158, EP-162, EP-167, EP-182, EP-196, EP-202, EP-203, EP-215, EP-245, EP-250, 3 Chrome Boilers, and Water Heater Evaporator:
i) Record the monthly natural gas combustion rate (MMscf).
ii) Multiply the monthly natural gas combustion rate (MMscf) by the HAP emission factor (lb/MMscf) by 0.0005 (ton/lb) to obtain the monthly HAP emissions (tons). Where the HAP emission factors are: [Obtained from AP-42 Section 1.4 "Natural Gas Combustion" (July 1998)]
(1) 1.89 lbs combined HAP/MMscf natural gas combusted

iii) For storage tanks containing materials with HAPs use equations from AP-42 Section 7.1 Organic Liquid Storage Tanks. [Special Condition 2.A.2)h)(vi)]

iv) For nickel plating, EP-237:
(1) Record the monthly usage rate (AMP) during SSM periods.
(2) Record the monthly usage rate (AMP) during controlled periods.
(3) Multiply the monthly controlled usage rate (AMP) by 9.57E-8 lb/AMP by 0.0005 ton/lb to obtain the monthly controlled nickel emission rate (tons). [Obtained from AP-42 Section 12.20 “Electroplating“ (July 1996)]
(4) Multiply the monthly SSM usage rate (AMP) by 9E-5 lb/AMP by 0.0005 ton/lb to obtain the monthly SSM nickel emissions (tons). [Obtained from AP-42 Section 12.20 “Electroplating“ (July 1996)]
(5) Sum the monthly controlled and SSM emissions to obtain the total nickel emissions.

v) For emergency generators EP-254 and EP-255:
(1) Record the monthly usage (hours) of each engine
(2) Multiply the monthly usage (hours) by the MHDR (MMBtu/hr) by the HAP emission factor (lb/MMBtu) by 0.0005 ton/lb. Where the MHDR of EP-254 is 2.4 MMBtu/hr and the MHDR of EP-255 is 1.4 MMBtu/hr. Where the HAP emission factors are: [obtained from AP-42 Section 3.2 “Natural Gas-fired Reciprocating Engines” (August 2000)]
(a) 7.22E-2 lbs combined HAP/MMBtu

9) Monthly individual HAP emissions calculated by summing the individual HAP emission from all emission units. [Special Condition 2.A.2)i]
10) 12-month rolling total individual HAP emissions from all emission units, and the sum of all individual HAP emissions from startup, shutdown, and malfunction as reported to the Air Pollution Control Program's Compliance and Enforcement Section according to the provisions of 10 CSR 10-6.050. [Special Condition 2.A.2)j]
11) Monthly combined HAP emissions calculated by summing all individual HAP emissions from all emission units. [Special Condition 2.A.2)k]
12) 12-month rolling total combined HAP emissions from all emission units, and the sum of all combined HAP emissions from startup, shutdown, and malfunction as reported to the Air Pollution Control Program's Compliance and Enforcement Section according to the provisions of 10 CSR 10-6.050. [Special Condition 2.A.2)l]
13) Indication of compliance status with the emission limitation. [Special Condition 2.A.2)m]

Total individual HAP emissions of less than 10.0 tons and total combined HAPs less than 25.0 tons per rolling 12-month period indicates compliance.

Attachment B
VOC Compliance Worksheet

This sheet covers the month of _____ in the year_____.

This form used to demonstrate compliance with one of the following permit conditions (check one):

- ☐ PERMIT CONDITION PW003 (Plant-wide Emission Limitation (386.83 tons/year))
- ☐ PERMIT CONDITION 001 (Paint Booth P-23 (40 tons/year))
- ☐ PERMIT CONDITION 001 (Paint Booths P-11 and P-12 (40 tons/year))

Coating Emissions Table				
Material (Name, Type)	**Amount Used (Note units)[9]**	**Density (lbs/gal)**	**VOC Content (Weight %)**	**Monthly VOC Emissions (Tons)**
Total VOC Emissions from Associated Natural Gas Combustion for P-23 (tons):				0.0019
Total VOC Emissions from Associated Natural Gas Combustion for P-25 (tons):				0.024
Sum of VOC Emissions Calculated for this Month[10] (tons):				
Current 12-Month Total of VOC Emissions[11] (tons):				

If complying with Permit Condition PW003, additionally calculate VOC emissions for the following:

[9] If usage is in pounds – [Amount Used] x [VOC Content] x [0.0005] = [Monthly VOC Emissions]
If usage is in gallons – [Amount Used] x [Density] x [VOC Content] x [0.0005] = [Monthly VOC Emissions]

[10] Include Associated Natural Gas Combustion Emissions in the sum for the appropriate booth. Booths P-11 and P-12 do not have associated natural gas combustion emissions. Include both values for plant-wide VOC calculation for PW003.

[11] Sum of the most recent consecutive 12 months of VOC emissions. Should include SSM emissions as reported to the Air Pollution Control Program's Compliance and Enforcement Section according to the provisions of 10 CSR 10-6.050.

Permit Condition 001 – A 12-Month VOC emissions total of less than 40.0 tons indicates compliance for each specified grouping of paint booths.

For Permit Condition PW003, continue VOC emission calculations below.

Fuel Emissions Table					
Emission Source	**Description**	**Monthly Throughput**	**Emission Factor**	**Source**	**Monthly VOC Emissions[12] (tons)**
EP-83	Aluminum Die Casting Melting Furnaces (3)	tons	0.2 lb/ton	SCC 30400103	
EP-84	Aluminum Pouring/Casting	tons	0.14 lb/ton	SCC 30400114	
EP-90 to EP-115	Space Heaters	mmcf	5.5 lb/mmcf	SCC 10500106	
EP-116 to E-125	Water Heaters	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-151	Oven	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-152	Oven	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-155	Power Wash Burner	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-156	Power Wash Burner	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-158	Dryer Oven (P-14)	mmcf	5.5 lb/mmcf	SCC 10200603	
EP-162		mmcf	5.5 lb/mmcf	SCC 10300603	
EP-163	Magnesium Die Casting Furnace	tons	2.4 lb/ton	SCC 30400601	
EP-167	Fluidized Bed	tons	3.5 lb/ton	eng calc	
EP-170	Boiler	mmcf	5.5 lb/mmcf	SCC 10200603	
EP-182	Oven	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-195/EP-196	Oven/Burner	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-202	Burner	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-203	Oven	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-215	PB20 Drying Oven	mmcf	5.5 lb/mmcf	SCC 10200603	
EP-245	Oven	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-250	Oven	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-?	Chrome Boilers	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-?	Water heater Evaporator	mmcf	5.5 lb/mmcf	SCC 10300603	
EP-254	Natural Gas Emergency Generator				
EP-255	Natural Gas Emergency Generator				

Sum of VOC Emissions Calculated for this Month[13] (tons):	
Current 12-Month Total of VOC Emissions[14] (tons):	

[12] [Monthly VOC Emissions] = [Monthly Throughput] × [Emission Factor] / [2000 lb/ton]

[13] Sum of the VOC emissions from the Coating Emissions Table and the Fuel Emissions Table.

[14] Sum of the most recent consecutive 12 months of VOC emissions. Should include SSM emissions as reported to the Air Pollution Control Program's Compliance and Enforcement Section according to the provisions of 10 CSR 10-6.050.

Permit Condition PW003 – A 12-month VOC emissions total of less than 386.83 tons indicates compliance.

Attachment C
$PM_{2.5}$ Compliance Worksheet

This form used to demonstrate compliance with one of the following permit conditions (check one):

☐ PERMIT CONDITION 002 (Paint Booth P-25) (10 tons/year)
☐ PERMIT CONDITION 002 (Paint Booth P-23) (10 tons/year)

Coating Used	Amount of Coating Used (gal)	Density[15] (lb/gal)	$PM_{2.5}$ Content[16] (Weight %)	Control Efficiency[17] (%)	$PM_{2.5}$ Emissions[18] (tons)
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
				96	
Total $PM_{2.5}$ Emissions from Associated Natural Gas Combustion for P-23 (tons):					0.0031
Total $PM_{2.5}$ Emissions from Associated Natural Gas Combustion for P-25 (tons):					0.033
Total $PM_{2.5}$ Emissions Calculated for this Month (tons):[19]					
Current 12-Month Total of $PM_{2.5}$ Emissions (tons):[20]					

[15] Highest density as reported in the coating's SDS.
[16] Highest $PM_{2.5}$ content as reported in the coatings SDS. If $PM_{2.5}$ and/or PM_{10} content not available, use PM or solids content.
[17] The overall PM control efficiency includes the HVLP transfer efficiency (20%), booth capture efficiency (100%), and water wall control efficiency (95%) per Construction Permits 072017-007 and 082018-014 : 20% + (1 – 20%) x 100% x 95% = 96%
[18] $PM_{2.5}$ Emissions (tons) = [Amount of Coating Used (gal)] x [Density (lb/gal)] x [$PM_{2.5}$ Content (Wt. %)] x 0.0005 tons/lb.
[19] Total $PM_{2.5}$ emissions from all coatings used, natural gas combustion, and SSM emissions as reported to the Air Pollution Control Program's Compliance and Enforcement Section according to the provisions of 10 CSR 10-6.050.
[20] Sum of the most recent 12 months of $PM_{2.5}$ Emissions. **A 12-Month $PM_{2.5}$ emissions total of less than 10.0 tons indicates compliance for each associated paint booth.**

Attachment D1
Permitted Materials

Construction Permit 122015-018 permitted the following materials for EP-240:

Product Name	Product Number
Fast Production Enamel, Safety Yellow	F75YC3
Fast Production Enamel, White	F75WC1

Construction Permit 072017-007 permitted the following materials for P-23 (EP-241 and EP-243):

Product	Product Number	Associated Emission Point
Thinner	810143	Base Coat Emission Points (EP-241)
Red Metallic Paint	280O	
White Paint	282O	
Grey Metallic Paint	284O	
Blue Paint	814850	
Silver Metallic Paint	800253	
Orange Paint	814849	
Black Paint	800551	
Clear Coat	804032	Clear Coat Emission Points (EP-243)
Clear Reducer	804033	
Converter	804034	

Construction Permit 2018-06-042 permitted the following materials for P-25 (EP-248 and EP-249):

Material ID	Associated Emission Point
11GY45 Dark Grey Met	Base Coat Emission Points (EP-248)
Paint 530S 11BK01	
Thinner IBIB	
Clear EK-AJ3120	Clear Coat Emission Points (EP-249)
Hardener J3501	
DIBK Solvent	

Attachment D2
Alternative Materials VOC Worksheet

Alternative Coating Name	Maximum Hourly Throughput (gal/hr)	Maximum Density from SDS (lb/gal)	Maximum VOC Content from SDS (%)	VOC PTE[21] (ton/yr)	Is VOC PTE < 13.55 ton/yr? (yes/no)

[21] [VOC PTE] = [Max Hourly Throughput] × [Max Density] × [Max VOC Content] / 2000

Attachment D3

Alternative Materials HAP Compliance Worksheet

Coating Name:_____

A	B	C	D	E	F	G	H
Individual HAP Name and CAS No.[22]	**Is HAP also PM? (y/n)[23]**	**Individual HAP Content (max wt%)[24]**	**Maximum Density of Coating (lb/gal)[25]**	**Maximum Application Rate (lb coating per hr)[26]**	**Overall PM Control Efficiency (%)[27]**	**Individual HAP PTE (tpy)[28]**	**Individual HAP SMAL (tpy)[29]**
Example: Benzene 71-43-2	no	2.0%	1.587	1.466	N/A	0.13	2.0
Example: Cobalt 2-Ethylhexanoate 136-52-7	yes	0.5%	1.587	1.466	96.0	0.0003	0.1

[22] Record all individual HAPs from this single coating SDS.
[23] Compare the HAP to the SMAL Table for verification as particulate matter.
[24] Record the maximum weight percent of each HAP from the SDS.
[25] Record the maximum density of the coating from the SDS
[26] Calculate the maximum application rate for the coating: E = D × MHDR.
[27] The overall PM control efficiency includes the HVLP transfer efficiency (20%), booth capture efficiency (100%), and exhaust filter control efficiency (95%) per Construction Permit 072017-007 and 082015-014: 20% + (1 – 20%) × 100% × 95% = 96%
[28] Calculate the particulate matter HAP potential to emit: G = C × E × (1 – F) × 8,760 / 2,000.
Otherwise, calculate the volatile HAP potential to emit: G = C × E × 8,760 / 2,000.
[29] Record the individual HAP SMAL from the most recent SMAL Table. If the individual HAP potential to emit is greater than the SMAL seek approval from the Air Pollution Control Program before using this coating.

Attachment E
SMAL HAP Worksheet

HAP Name: _____ CAS No:_____ SMAL Level[30]:_____

A	B	C	D	E	F	G	H	I	J
Coating Name	**Is HAP also PM?[31] (y/n)**	**Individual Max HAP Content from SDS (wt%)**	**Max Density of Coating from SDS (lb/gal)**	**Monthly Usage (gal)**	**Overall PM Control Efficiency[32] (%)**	**Monthly Individual HAP Emissions[33] (tons)**	**Individual HAP PTE 12-Month Rolling Total from Previous Month (tons)[34]**	**Individual HAP Monthly Emission Total from Previous Year[35] (tons)**	**Current 12-Month Total of Individual HAP Emissions[36] (tons)**
Example: Coating with volatile HAPs	no	2.0%	1.587	1,000	N/A	0.02	0.00	0.00	0.02
Example: Coating with solid HAP	yes	0.5%	1.587	1,000	96.0	0.0002	0.00	0.00	0.0002

[30] Record the individual HAP SMAL from the most recent SMAL table.
[31] Compare the HAP to the SMAL tables for verification as particulate matter.
[32] The overall PM control efficiency includes the HVLP transfer efficiency (20%), booth capture efficiency (100%), and water wall control efficiency (95%) per Construction Permit 082018-014: 20% + (1 - 20%) × 100% × 95% = 96%. Do not apply an overall PM control efficiency if the HAP is not PM.
[33] Calculate the particulate matter HAP emissions: G = C × D × E × (1 – F) / 2,000. Otherwise, calculate the volatile HAP potential to emit: G = C × D × E / 2,000. For HDI, calculate HDI emissions (Hexamethylene,-1,6-Diisocyanate), = 0.076 lb HDI / lb of HDI sprayed if usage is in pounds or gallons. For HDI emissions usage in tons = 0.076 tons HDI / ton HDI sprayed (same ratio).
[34] 12-Month Rolling Individual HAP emissions total (tons) from last month in tons.
[35] Monthly Individual HAP emissions total (tons) from previous year in tons.
[36] Calculate the new 12-Month Rolling Individual HAP emissions totals by using J = G + H – I

Attachment F

Monthly Hexamethylene Diisocyanate (HDI) Compliance Worksheet

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

A	B	C	D	E
Material Used (Name)	**Amount of Material Used[37] (Include Units)**	**Density (lb/gal)**	**HDI Content (weight %)**	**Monthly HDI Emissions (tons)**
Total HDI Emissions Calculated for this Month (tons):[38]				
Current 12-Month Total of HDI Emissions (tons):[39]				

[37] If usage is in tons - [Amount of Material Used] × [HDI Content] = [Monthly HDI Emissions]
If usage is in pounds - [Amount of Material Used] × [HDI Content] × 0.005 = [Monthly HDI Emissions]
If usage is in gallons - [Amount of Material Used] × [Density] × [HDI Content] × 0.005 = [Monthly HDI Emissions]

[38] Include SSM emissions as reported to the Air Pollution Control Program's Compliance and Enforcement Section according to the provisions of 10 CSR 10-6.050.

[39] Calculate the new 12-month combined HDI emissions total. **A 12-month HDI emissions total of less than 0.02 tons indicates compliance for P-12.**

Attachment G
Pressure Drop Monitoring

Date	Emission Point / Control Device	Pressure Drop (w.c.)	Manufacturer's Recommended Value (w.c.)	Within Specifications? (Yes / No)

Attachment H

Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # _____

Date/Time	Inspection/ Maintenance Activities	Malfunction Activities					
		Malfunction	Impact	Duration	Cause	Action	Initials

Attachment I
pH Solution Monitoring

Date	Emission Point / Control Device	pH	Manufacturer's Recommended pH Value	Within Specifications? (Yes / No)

Attachment J
Plastic Throughput Tracking

This tracking sheet is for the month of ____________________ in the year ______________.

Machine	**Monthly Time Run (hrs)**	**Monthly Plastic Amount Produced (lbs)**

Attachment K1

Method 22 Visible Emissions Observations	
Installation Name	Observer Name
Location	Date
Sky Conditions	Wind Direction
Precipitation	Wind Speed
Time	Emission unit
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.	

Minute	Seconds				Comments
	0	15	30	45	
	Visible Emissions Yes (Y) or No (N)				
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment K2

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY

Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____ _____ _____

YES NO Signature of Observer

Attachment L
Plastic Tracking

This attachment is for the month of _____ in the year _____.

Date	Machine ID	Time Ran (hours)	Plastic Produced (tons)
Sum of Monthly Time Run and Plastic Produced (hours and tons):			
This Month's Calculated Plastic Production Rate[40] (tons/hr):			

[40] Calculate by dividing the sum of the monthly plastic produced by the sum of the time ran. **A value of less than or equal to 49,988 tons/hr indicates compliance with the limitation.**

Attachment M
Fugitive Emission Observations

Date	Time	Visible Emissions Beyond Boundary		If There Are Visible Emissions Beyond the Property Boundary		Initial
		No	Yes	Cause	Corrective Action	

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

TG Missouri Corporation manufactures plastic, rubber, and metal automobile parts and accessories. Processes include plastic injection and extrusion lines, plastic molding presses, aluminum and magnesium die cast furnaces, painting booths, dryers, adhesive application machines, an air bag assembly line, a rubber hose extrusion line and numerous supporting types of equipment. The installation is a major source of VOCs and an area source of HAPs. The facility is not a named source and fugitive emissions are not counted in calculating potential-to-emit.

Potential to Emit (PTE) for the Installation and Reported Air Pollutant Emissions, tons per year

Pollutants	PTE[41]	Reported Emissions				
		2017	2016	2015	2014	2013
Particulate Matter ≤ Ten Microns (PM_{10})	< 16.14	1.57	1.30	1.20	13.68	3.14
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)	< 14.14	1.50	1.24	1.14	13.62	3.06
Sulfur Oxides (SO_x)	0.14	0.02	0.02	0.02	0.02	0.04
Nitrogen Oxides (NO_x)	20.29	0.46	0.18	0.27	0.49	4.81
Volatile Organic Compounds (VOC)	< 386.83	150.13	139.08	103.75	162.70	89.57
Carbon Monoxide (CO)	8.07	0.05	0.00	0.00	0.14	0.79
Hazardous Air Pollutants (HAPs)	< 10/25	2.32	5.36	3.34	1.81	2.05

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 September 12, 2011; revised April 4, 2016 and October 19, 2017;
2) 2013-2017 Emissions Inventory Questionnaires,
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4) WebFIRE;
5) All documents listed under the Construction Permit History section.

[41] Potential emissions were obtained from Construction Permit 082018-014. Per the construction permit, all PM emissions of the project were assumed to be $PM_{2.5}$. PTE takes in account the plant-wide VOC and HAP limitations as well as the $PM_{2.5}$ limitations.

Construction Permit History

The following construction permits were issued to installation:

Construction Permit 1187-009, issued November 25, 1987

This construction permit was issued for the installation of a parts molding operation. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0290-004, issued January 13, 1990

This construction permit was issued for the installation of 14 polyurethane presses, a spray booth, and an adhesive coating machine. The special conditions of this permit have been superseded by Construction Permit 0896-005

Construction Permit 0290-003, issued January 30, 1990

This construction permit was issued for the installation of six polyurethane presses to mold air bag covers. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0590-006, issued April 30, 1990

This permit was issued for the addition of painting equipment for side protection molding. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0691-002, issued June 11, 1991

This permit was issued for the installation of nine polyurethane presses for molding air bag covers. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0791-010, issued July 22, 1991

This permit was issued for the installation of six polyurethane steering wheel presses. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0791-013, issued July 30, 1991

This permit was issued for the installation of injection molding, an aluminum die cast, an air bag assembly. While not explicitly stated as superseded by Construction Permit 0896-005, the intention of 0896-005 was to additionally supersede this construction permit. As a result, this operating permit considers 0791-013 to be superseded.

Construction Permit 0592-001, issued April 16, 1992

This permit was issued for the installation of six polyurethane steering wheel presses. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0792-029, issued June 17, 1992

This permit was issued for the installation of three polyurethane steering wheel presses. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0393-010, issued February 22, 1993

This permit was issued for the installation of six polyurethane presses and one aluminum die cast furnace. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0794-018, issued July 26, 1994

This permit was issued for the installation of aluminum die casting, air bag assembly, polyurethane processing, and spray painting processes. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0595-007, issued April 25, 1995

This permit was issued for the addition of injection molding equipment. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 1295-019, issued December 26, 1995

This permit was issued for the installation of an air bag robotic paint booth. It contains three special conditions.

- Special Condition 1 contains a 10/25 HAP limitation. This limitation was not included in the operating permit because Permit Condition PW001 is more stringent.
- Special Condition 2 and 3 contain recordkeeping and reporting requirements based on Special Condition 1. Because Special Condition 1 was not included in the operating permit, Special Conditions 2 and 3 have been excluded as well.

Construction Permit 0396-005, issued March 12, 1995

This permit was issued for the installation of magnesium die casting. The special conditions of this permit have been superseded by Construction Permit 0896-005.

Construction Permit 0896-005, issued August 15, 1996

This permit was issued for the installation of a Saturn outer belt process line, a fluidized bed gasification process, and a rubber extrusion process. This permit supersedes all special conditions in the following permits: 0986-012, 1187-009, 0290-003, 0290-004, 0590-006, 0691-002, 0791-010, 0592-001, 0792-029, 0393-010, 0794-018, 0595-007, and 0396-005. While not explicitly stated as superseded by this permit, the intention was to additionally supersede 0791-013. As a result, this operating permit considers 0791-013 to be superseded. This permit contains four special conditions.

- Special Condition 1 contains a VOC limitation that restricts the installation (at the time of this permit) to less than 386.83 tons of VOCs per rolling 12-month period. It can be assumed that this limit is superseded by the repeating condition in CP0998-006.
- Special Condition 2 requires recordkeeping for the VOC limitation. It has been assumed to be superseded.
- Special Condition 3 contains general reporting conditions. It has been assumed to be superseded.
- Special Condition 4 contains requirements for odors. See 10 CSR 10-6.165 in Section IV of this operating permit.

Construction Permit 1297-018, issued December 17, 1997

This permit was issued for two magnesium die casting lines. It contains three special conditions.

- Special Condition 1 contains a VOC limitation that restricts the installation (at the time of this permit) to less than 386.83 tons of VOCs per rolling 12-month period. It can be assumed that this limit is superseded by the repeating condition in CP0998-006.
- Special Condition 2 requires recordkeeping for the VOC limitation. It has been assumed to be superseded.
- Special Condition 3 contains general reporting conditions. It has been assumed to be superseded.

Construction Permit 0298-014, issued February 19, 1998

This permit was issued for the installation of six new polyurethane paint booths. It contains three special conditions.

- Special Condition 1 contains a VOC limitation that restricts the installation (at the time of this permit) to less than 386.83 tons of VOCs per rolling 12-month period. It can be assumed that this limit is superseded by the repeating condition in CP0998-006.
- Special Condition 2 requires recordkeeping for the VOC limitation. It has been assumed to be superseded.
- Special Condition 3 contains general reporting conditions. It can be assumed to be superseded.

Construction Permit 0998-006, issued September 4, 1998

This permit was issued for the installation of four polyurethane paint booths. It contains three special conditions.

- Special Condition 1 contains a VOC limitation that restricts the installation (at the time of this permit) to less than 386.83 tons of VOCs per rolling 12-month period. This limitation was incorrectly applied in the previous operating permit as a plant-wide condition rather than only applying to the equipment at the time of issuance of 0998-006. However, after discussion with the permittee, they wished to retain the limitation as a plant-wide limit. This is a more stringent voluntary limitation than the one in this construction permit – as a result, this special condition was not included in the operating permit.
- Special Condition 2 requires recordkeeping for the VOC limitation. It was not included in the operating permit due to the associated Special Condition 1 being excluded from this operating permit.
- Special Condition 3 contains general reporting conditions. It was not included in the operating permit due to the associated Special Condition 1 being excluded from this operating permit.

Construction Permit 042002-018, issued April 26, 2002

This permit was issued for the installation of a robotic paint booth (P-10) that will be used for process side molding used in the production of Honda vehicles. No special conditions were included due to P-10 being dismantled.

Construction Permit 082002-019, issued August 28, 2002

This permit was issued for the installation of four new paint booths. It contains one special condition. Conditions applicable to Paint System P-10 were not included due to P-10 being dismantled.

- Special Condition 1A limits VOC emissions. It has been incorporated into the operating permit.
- Special Condition 2B limits HAPs to less than 10/25 tons from the new booths. This condition has not been incorporated into the operating permit in order to streamline it; Permit Condition PW001 is more stringent than this limitation.
- Special Condition 1C has a limit on hexamethylene diisocyanate (HDI) from P-12. This limit has been incorporated into the operating permit.
- Special Condition 1D and 1E contain recordkeeping and reporting requirements that have been incorporated into the operating permit.

Construction Permit 022009-011, issued February 25, 2009

This permit was issued for the installation of a compact electroplating operation and two new automated paint spray booths. All special conditions have been superseded by Construction Permit 042012-008A.

Construction Permit 122010-014, issued December 27, 2010

This permit was issued for the installation of a water transfer imaging process including a clear coat spray booth. All special conditions have been superseded by Construction Permit 042012-008A; however, the superseding conditions of this construction permit are still active. This construction permit supersedes Special Condition 1A and 3 of Construction Permit 022009-011.

Construction Permit 012012-010, issued January 17, 2012

This permit was issued for the installation of the Blackout Booth Paint System (EP-227) and an increase in plastic injection throughput. It contains seven special conditions. EP-227 has been dismantled, so conditions applicable to it were not included in the operating permit.

- Special Condition 1 supersedes Special Condition 2A of Construction Permit 122010-014.
- Special Condition 2 has been superseded by Construction Permit 042012-008A.
- Special Condition 3 contains filter requirements for the paint booth. It was not included due to EP-227 being dismantled.
- Special Condition 4 contains production limits on plastic production. It has been incorporated into the operating permit.
- Special Condition 5 contains alternative coating requirements for the paint booth. It was not included due to EP-227 being dismantled.
- Special Condition 6 contains storage requirements for coatings and solvents. These requirements have already been incorporated into Permit Condition PW002 from Special Condition 5 of Construction Permit 122015-018. In order to streamline this operating permit, this special condition was not included.
- Special Condition 7 contains general recordkeeping and reporting requirements. They have been incorporated into the operating permit.

Construction Permit 042012-008, issued April 16, 2012

This permit was issued for the installation of a system for applying decorative reflective surface finishes to plastic automobile trim parts. All special conditions have been superseded by Construction Permit 042012-008A; however, the superseding conditions of this construction permit are still active. This construction permit supersedes Special Conditions 2A through 2D in Construction Permit 122010-014.

Construction Permit 042012-008A, issued March 14, 2013

This amendment was issued to correct maximum hourly design rates from Construction Permit 042012-008. All special conditions were superseded by Construction Permit 082014-016; however, the superseding conditions of this construction permit are still to be taken in account. This construction permit supersedes all special conditions of 022009-011, 122010-014, and 042012-008, and Special Condition 2 of 012012-010.

Construction Permit 082014-016, issued August 26, 2014

This permit was issued for the installation of a compact plating system designated as PMF4 process. This is a system for applying decorative reflective surface finishes to plastic automobile trim parts. It contains nine special conditions. Conditions applicable to removed equipment were not included due to them being dismantled.

- Special Condition 1 supersedes all special conditions of Construction Permit 042012-008A.
- Special Condition 2A has been superseded by Construction Permit 122015-018, which contained a 10/25 HAP limit. Special Condition 2B, which contains recordkeeping requirements for 2A is assumed to no longer apply due to its associated limit being superseded. As a result, it has not been incorporated into the operating permit.
- Special Condition 3 contains control device requirements for a mesh pad system with associated emission sources. This condition has been incorporated into the operating permit.
- Special Condition 4 requires use of a mesh pad mist eliminator with associated emission sources. It has been incorporated into the operating permit.
- Special Condition 5 requires the use of a packed bed scrubber. It has been incorporated into the operating permit.
- Special Condition 6 contains requirements for the use of a packed bed scrubber and mist eliminator. It has been incorporated into the operating permit.
- Special Condition 7 contains capture device requirements for PMF3 and PMF4. It has been incorporated into the operating permit.
- Special Condition 8 contains a requirement to keep all solvents and coatings in sealed containers when not in use. This condition is a repeat of Special Condition 5 of Construction Permit 122015-018. In order to streamline this operating permit, only Special Condition 5 of Construction Permit 122015-018 was incorporated into the operating permit.
- Special Condition 9 contains general recordkeeping and reporting requirements. It has been incorporated into the operating permit.

Construction Permit 122015-018, issued December 29, 2015

This permit was issued for the installation of a Kaizen Paint Booth System (EP-240). It contains six special conditions.

- Special Condition 1 supersedes Special Condition 2A of Construction Permit 082014-016.

- Special Condition 2A has been superseded by Construction Permit 072017-007, which contained a 10/25 installation-wide HAP limit. Because 2A has been superseded, it can be assumed the recordkeeping requirements of 2B no longer apply. As a result, this special condition has not been incorporated into the operating permit.
- Special Condition 3 requires use of a filter on paint booth EP-240, and a requirement to only use one spray gun at a time. The conditions have been incorporated into the operating permit. There is no monitoring requirement to insure that only one gun is used at any time. The Kaizen Paint Booth System is an enclosed paint booth, but is not a production paint booth. It is used when painting things like railings and wagons that have been fabricated for use within the plant. The paint used is a "safety yellow" paint so that the fabricated parts are easily seen. While the booth is large, it is large because parts like railings are large. Because it is part of the plant support process, while it is in use most days, it is often only used for 20 minutes per day. The design of the booth is such that the airflow goes from side to side rather than front to back; this means that only one person can spray at a time – more than one operator, and only the upwind operator isn't covered in overspray. Because the paint booth is large, multiple paint gun attachment points are present in the booth. The decision to use multiple attachment points for the paint gun means that the operator isn't required to drag a long hose around in the booth to paint parts. Because only one operator is in the booth spraying paint, it is simpler to move the spray gun between attachment points when painting a large part that it is to clean multiple paint guns. For these practical and design reasons, it is not felt that a condition to demonstrate that only one gun is used at a time is necessary.
- Special Condition 4 contains alternative coating requirements for the paint booth. It has been incorporated into the operating permit.
- Special Condition 5 contains a requirement to keep solvents and coatings in sealed containers when not in use. It has been incorporated into the operating permit.
- Special Condition 6 contains general recordkeeping and reporting requirements. It has been incorporated into the operating permit.

Construction Permit 072017-007, issued July 11, 2017

This permit was issued for the installation of a new automated paint spray booth. This permit contains six special conditions.

- Special Condition 1 supersedes Special Condition 2A of Construction Permit 122015-018.
- Special Condition 2A, which contains a 10/25 installation-wide HAP limit, has been superseded by Construction Permit 082018-014. Special Condition 2B still applies, which contains VOC, $PM_{2.5}$, and SMAL limits. These limits have been incorporated into the operating permit.
- Special Condition 3 requires use of a water wall control device for EP-241 and EP-243. It has been incorporated into the operating permit.
- Special Condition 4 requires the use of a capture device for EP-241 and EP-243. It has been incorporated into the operating permit.
- Special Condition 5 contains alternative coating conditions for the paint system. It has been incorporated into the operating permit.
- Special Condition 5 contains general recordkeeping and reporting requirements. It has been incorporated into the operating permit.

Construction Permit 082018-014, issued August 29, 2018

This permit was issued for the installation of an automated paint spray booth. This permit contains six special conditions.

- Special Condition 1 supersedes Special Condition 2A in Construction Permit 072017-007.
- Special Condition 2 contains a 10/25 HAP limit for the entire installation. It also contains VOC and $PM_{2.5}$ limits. It has been incorporated into the operating permit.
- Special Condition 3 requires use of a water wall control device for EP-248 and EP-249. It has been incorporated into the operating permit.
- Special Condition 4 contains capture device requirements for EP-248 and EP-249. It has been incorporated into the operating permit.
- Special Condition 5 contains conditions for the use of alternative coatings in the paint system. It has been incorporated into the operating permit.
- Special Condition 6 contains general recordkeeping and reporting requirements. It has been incorporated into the operating permit.

Missouri Code of State Regulations (CSR) Applicability

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

See the below table for rule applicability:

Emission Source	Description	Reason
EP-01 to EP-59	Polyurethane Covering and Painting	Applicable
EP-62 and EP-63	Paint Booths (P-8) Line (EP-62) Paint Booth (EP-63) Paint Booth	Applicable
EP-80 to EP-82	Building 6 Paint Booth (P-18 Service) Line (EP-81) Building 1 Paint Booth (P-18) Service Manual	Applicable
	(EP-82) Building 1 Paint Booth (P-18) – Drying (electric)	Not applicable, PM emissions not expected
EP-83	(3) Aluminum Die Cast Melting Furnaces (electric)	Not applicable, PM emissions not expected
EP-84	Aluminum Die Casting and Aluminum Die Casting Boiler (electric)	Not applicable, PM emissions not expected
EP-90 to EP-115	NG Space Heaters (< 10 MMBtu/hr each)	Not applicable, exempt per (1)(L)
EP-116 to EP-125	NG Water Heaters (< 10 MMBtu/hr each)	Not applicable, exempt per (1)(L)
EP-144 to EP-148	Air Robotic Paint Booth (P-5 and P-6) Line: (EP-146) Air Robotic Paint Booth (P-5) (EP-147) Air Robotic Paint Booth (P-6) (EP-148) Paint Kitchen	Applicable
EP-149 to EP-154	Air Bag Robotic Paint Booth (P-6) Line (EP-149) Setting Zone (EP-150) Setting Zone	Not applicable, PM emissions not expected
	(EP-151) NG Oven (< 10 MMBtu/hr) (EP-152) NG Oven (< 10 MMBtu/hr)	Not applicable, exempt per (1)(L)

Emission Source	Description	Reason
	(EP-153) Cooling Zone (EP-154) Cooling Zone	Not applicable, PM emissions not expected
EP-155 to EP-162	Air Bag Robotic Paint Booth (P-14) Line: (EP-155) Power Wash (EP-156) Power Wash (EP-157) Power Wash	Not applicable, PM emissions not expected
	(EP-158) NG Dryer Oven	Not applicable, exempt per (1)(L)
	(EP-159) Air Bag Robotic Paint Booth (P-14)	Applicable
	(EP-160) Paint Kitchen Storage (EP-161) Setting Zone (EP-162) Heat Zone Exhaust	Not applicable, PM emissions not expected
EP-163	Magnesium Die Casting and Magnesium Die Casting Furnace (electric)	Not applicable, PM emissions not expected
EP-167	Fluidized Bed Parts Cleaner	Not applicable, exempt per (1)(L)
EP-171 to EP-183	Robotic Paint Booth (P-9) Line: (EP-171) Paint Kitchen (EP-172) Sludge Remover (EP-173) Clean Room (EP-174) Pre-Treatment (EP-175) Ionization	Not applicable, PM emissions not expected
	(EP-176) Robotic Paint Booth (P-9) (EP-177) Robotic Paint Booth (P-9)	Applicable
	(EP-178) Flash-off	Not applicable, PM emissions not expected
	(EP-181) Infrared Dryer (electric)	Not applicable, PM emissions not expected
	(EP-182) NG Cure Oven (5 MMBtu/hr)	Not applicable, exempt per (1)(L)
	(EP-183) Air Recirculation	Not applicable, PM emissions not expected
EP-193 to EP-196	Building 3 Paint (Three Axis Coating) Finish Booth (P-11) Line: (EP-194) Cooling	Not applicable, PM emissions not expected
	(EP-195) Oven	
	(EP-196) Burner	
EP-197 to EP-205	Robotic Paint Booth (P-12) Line: (EP-197) Paint Kitchen	Not applicable, PM emissions not expected
	(EP-198) Spray Booth A (EP-199) Spray Booth B	Applicable
	(EP-200) Air Flash (ventilation ducts) (EP-201) IR Oven	Not applicable, PM emissions not expected
	(EP-202) Burner (rating, NG) (EP-203) Gas Heat Oven (rating, NG)	Not applicable, exempt per (1)(L)
	(EP-205) Cooling	Not applicable, PM emissions not expected
EP-212 to EP-216	PB-20 Paint System (paint kitchen/storage, spray booths A & B, flash off tunnel, oven & cooling zone) (EP-212) Paint Kitchen	Applicable
	(EP-213) Spray Booth A	Applicable

Emission Source	Description	Reason
	(EP-214) Spray Booth B	
	(EP-215) PB-20 Drying Oven (NG)	Not applicable, exempt per (1)(L)
	(EP-216) Cooling	Not applicable, PM emissions not expected
EP-234	PMF4 Chrome Etching	Applicable
EP-235	PMF4 Hydrochloric Acid Catalyst Tank, 6,500 gal	Applicable
EP-236	PMF4 Copper Plating	Applicable
EP-237	PMF4 Nickel Plating	Applicable
EP-238	PMF4 Decorative Chrome Plating	Applicable
EP-239	PMF4 Nitric Acid Exfoliate Tank	Applicable
EP-240	Kaizen Booth Paint System	Applicable
EP-241	P-23 Base Coat Booth Stack 1	Applicable
EP-243	P-23 Clear Coat Booth Stack 1	Applicable
EP-245	P-23 Cure Oven Exhaust	Not applicable, PM emissions not expected
EP-246	P-23 Cooling Zone Exhaust	Not applicable, PM emissions not expected
EP-247	P-23 Paint Kitchen	Not applicable, PM emissions not expected
EP-248	P-25 Base Coat Booth Stack 1	Applicable
EP-249	P-25 Clear Coat Booth Stack 1	Applicable
EP-250	P-25 Cure Oven Exhaust (1 MMBtu/hr, NG)	Not applicable, exempt per (1)(L)
EP-251	P-25 Cooling Zone Exhaust (ventilation with incoming filtered air which recirculates)	Not applicable, PM emissions not expected
EP-252	P-25 Paint Kitchen	Not applicable, PM emissions not expected
EP-253	HCL Tank	Not applicable, PM emissions not expected
EP-254	NG Emergency Generator	Not applicable, exempt per (1)(A)
EP-255	NG Emergency Generator	Not applicable, exempt per (1)(A)
-	(3) Chrome Boilers (NG)	Not applicable, exempt per (1)(L)
-	Water Heater Evaporator (NG)	Not applicable, exempt per (1)(L)

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule does not apply to any combustion unit at the facility as all combustion units are fueled with natural gas and meet exemption (1)(A)2.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This rule does not apply to any combustion unit at the facility as all combustion units are fueled with natural gas and meet exemption (1)(A).

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

The following are exempt due to being indirect heating devices per (1)(B)6:

Emission Source	Description
EP-90 to EP-115	Natural Gas Space Heaters (<10 MMBtu/hr each)
EP-116 to EP-125	Natural Gas Water Heaters (<10 MMBtu/hr each)
EP-215	PB20 Drying Oven
EP-215	PB20 Drying Oven
EP-245	P-23 Cure Oven Exhaust
EP-250	P-25 Cure Oven Exhaust

The following are exempt per the 0.5 lb/hr rate rule (1)(B)(12):

Emission Source	Description	MHDR (ton/hr)	PM Emission Factor (lb/ton)	PM Emission Rate (lb/hr)
EP-62 and -63	Paint Booths – (P-8)	0.0023	7.44	0.02
EP-80- to -82	Building 6 Paint Booth (P-18 Service)	0.008	5.08	0.04
EP-84	Aluminum Pouring/Casting	0.1605	0.47	0.08
EP-157	Air Bag Robotic Paint Booth (P-14)	0.02	19	0.38
EP-159	Air Bag Robotic Paint Booth (P-14)	0.02	19	0.38
EP-163	Magnesium Die Casting	0.02	4.00	0.08
EP-194-196	Robotic Paint Booth (P-11)	0.0059	11.78	0.07
EP-197-205	Robotic Paint Booth (P-12)	0.0059	5.35	0.03

The following emission units are all coating operations equipped with a control system with a design to control 95% of the particulate overspray per (1)(B)(14). As long as the control systems are operated and maintained in accordance with the manufacturers' specifications, these emission units are exempt from this rule:

Emission Source	Description	Control Device
EP-144 to EP-148	(EP-146) Air Robotic Paint Booth (P-5) (EP-147) Air Robotic Paint Booth (P-5)	Water Wall (≥95%)
EP-155 to EP-162	(EP-159) Air Bag Robotic Paint Booth (P-7)	Water Wall (≥95%)
EP-171 to EP-183	(EP-176) Robotic Paint Booth (P-9) (EP-177) Robotic Paint Booth (P-9)	Water Wall (≥95%)
EP-240	Kaizen Booth Paint System	CD-240 Fabric Filter (60%?)
EP-241	P-23 Base Coat Booth Stack 1	CD-241 Water Wall (≥95%)
EP-243	P-23 Clear Coat Booth Stack 1	
EP-248	P-25 Base Coat Booth Stack 1	CD-242 Water Wall (≥95%)
EP-249	P-25 Clear Coat Booth Stack 1	

The following are exempt for having a federally enforceable control efficiency of at least 90% per (1)(B)(15):

Emission Source	Description	Control Device
EP-233	PMF3 Nitric Acid Exfoliate	CD-10 Mesh Pad Mist Eliminator (≥90%)
EP-234	PMF4 Chrome Etching	CD-234 3-Stage Composite Mesh Pad Scrubber (≥90%)
EP-235	PMF4 Hydrochloric Acid Catalyst	CD-235 Cross-flow Packed Bed Scrubber (≥90%)
EP-236	PMF4 Copper Plating	CD-236 Cross-flow Packed Bed Scrubber (≥90%)
EP-237	PMF4 Nickel Plating	CD-237a and CD-237b Cross-flow Bed Scrubber w/Mist Eliminator (≥90%)
EP-238	PMF4 Decorative Chrome Plating	CD-238 3-Stage Composite Mesh Pad Scrubber (≥90%)
EP-239	PMF4 Nitric Acid Exfoliate	CD-239 Packed Bed Scrubber w/Mist Eliminator (≥90%)

The following are exempt per the weight limit rule per (1)(B)(16):

Emission Source	Description	Process Weight Rate (ton/hr)	Emission Factor (lb/ton)	Emission Rate (lb/hr)	10-6.400 Limit (lb/hr)
EP-01- to -59	Aluminum Steering Wheel Cleaning, Polyurethane Covering and Painting	0.2246	2.81	0.63	1.51
EP-167	Fluidized Bed	0.457	2.25	1.03	2.43

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*

This rule does not apply. All the fueled emission units burn natural gas, which is exempt per (1)(E).

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. This subpart does not apply to this facility as the boiler for the rubber extrusion process (EP-170) is rated at 0.06615 MMBtu/hr.

40 CFR Part 60, Subpart MM - *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations*

The provisions of this subpart apply to each prime coat operations, guide coat operations, and topcoat operations at automobile or light-duty truck assembly facilities. This subpart is not applicable to this facility as it does not meet the definition of an automobile or light-duty assembly facility defined in EPA's Clean Air Act Applicability Determination Index.

40 CFR Part 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

This subpart does not apply. The engines were installed before the applicability dates of this subpart.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart N – *National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*

This subpart applies to each chromium electroplating or chromium anodizing tank at facilities performing decorative chromium electroplating and applicable requirements can be found in Permit Condition 011 of this permit.

40 CFR Part 63, Subpart WWWWWW – *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*

This subpart applies to any plating and polishing facility that is an area source of HAP. Applicable requirements can be found in Permit Condition 012 of this permit.

40 CFR Part 63 Subpart IIII – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks*

This subpart establishes national emissions standards for HAP for facilities which surface coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks. The requirements of this subpart apply to major sources of HAP per §63.3081(b), therefore the facility is not subject to this subpart.

40 CFR Part 63, Subpart PPPP – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*

This subpart establishes national emissions standards for HAP for plastic parts and products surface coating facilities. The requirements of this subpart apply to major sources of HAP per §63.4481(b), therefore the facility is not subject to this subpart.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart is applicable to the emergency generators EP-253 and EP-254 and has been applied within Permit Condition 014 of this operating permit.

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_2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2 emissions were not included within this permit. If applicable, the applicant is required to report the data directly to EPA. If applicable, the public may obtain CO_2 emissions data for this installation by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations
None.

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 draft of the Part 70 Operating Permit for TG Missouri Corporation was placed on public notice on June 28, 2019, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The three comments are addressed in the order in which they appear within the letter.

Comment #: 1
Permit Condition 001, Permit Condition 002, Permit Condition 006A, Permit Condition 006B, Permit Condition 007, Permit Condition 011, Permit Condition 012, and Permit Condition 013 all appear to omit the emission units and applicable requirements associated with PMF 1/Chrome 1- Decorative Chrome Plating Process; PMF 2/Chrome 2-Decorative Chrome Plating Process; and PMF 3/Chrome 3-Decorative Chrome Plating Process. The Application for Authority to Operate, submitted by TG Missouri in October 2012 and subsequently updated in April 2016 and again in October 2017, all appear to include the MoDNR required information on applicable Forms OP-A02, OP-D03 and OP- D05. The draft Part 70 operating permit on public notice provides no explanation regarding the exclusion of PMF 1/Chrome 1. PMF 2/Chrome 2 and PMF 3/Chrome 3 and it therefore appears to EPA that the draft-operating permit may not include all applicable requirements. EPA recommends MoDNR consider reassessing TG Missouri's applicable construction permits and the Application for Authority to Operate such that all emission units and their specific limitations are included in the draft Part 70 operating permit.

Response to Comment:
The Phase 1, 2, and 3 chrome plating processes were dismantled after the initial application was received. The subsequent applications mentioned only the equipment added under new construction permits. Since these former emissions units are no longer in place and are not listed in the emission unit list in Section I, no changes were made to this operating permit.

Comment #: 2
Permit Condition 004 requires the permittee to control particulate matter from Emission Point EP-241, Emission Point EP-243, Emission Point EP-248 and Emission Point EP-249 using a water wall. Permit Condition 004 also requires the permittee to maintain the operating pressure drop within the design conditions specified by the manufacturer's performance warranty; and requires the permittee to demonstrate that each paint booth meets a minimum recommended face velocity. However, Permit Condition 004 includes no record keeping requirements for the permittee to verify compliance with either the water wall operating pressure drop or each paint booth face velocity. Therefore, EPA recommends MoDNR consider adding record keeping requirements to Permit Condition 004 to verify compliance with water wall operating pressure drop and paint booth face velocity.

Response to Comment:
A requirement to record the pressure drop across the water wall was added to Permit Condition 4. With respect to monitoring compliance with paint booth face velocity, Construction Permit 082018-014 required that the permittee design and construct each paint booth according to OSHA requirements 29 CFR 1910.94(C)(6) *Velocity and Air Flow Requirements*, and demonstrate that each paint booth was constructed according to these requirements by keeping a record of the design parameters that showed the minimum recommended face velocity and by keeping the engineering drawings that demonstrate

that the spray booths were designed to meet the minimum face velocity. While this doesn't directly measure paint booth face velocity, the demonstration that the spray booths were designed to meet the minimum face velocity together with the operating pressure drop will insure that the paint booth face velocity meets design goals so long as the paint booth itself is operated as designed and is not subsequently altered.

Comment #: 3
Permit Condition 005 incorporates special conditions from Permit to Construct #122015-018, issued December 29, 2015, for the Kaizen Paint Booth System, Emission Point EP-240. Permit Condition 005 requires that "only one spray gun maybe used at once," however, Permit Condition 005 does not include any monitoring/record keeping verifying compliance with this operational requirement. Form OP-DO5- Compliance Determination Methods, submitted in the October 2017 update to the Application for Authority to Operate, indicates TG Missouri monitors "paint throughput" to verify compliance with the emission limitation or standard for the Kaizen Paint Booth System. Form OP-D03- Emission Unit Information, submitted in this October 2017 update, shows the Kaizen Paint Booth System has a maximum hourly design rate (HDR) of 0.66 gallons per hour. EPA recommends MoDNR consider including a requirement in Permit Condition 005 for the monitoring and recording of paint throughput in the Kaizen Paint Booth System, to verify compliance with the "operation of only one spray gun at once" operational requirement.

Response to Comment:
There is no monitoring requirement to insure that only one gun is used at any time. The Kaizen Paint Booth System is an enclosed paint booth, but is not a production paint booth. It is used when painting things like railings and wagons that have been fabricated for use within the plant. The paint used is a "safety yellow" paint so that the fabricated parts are easily seen. While the booth is large, it is large because parts like railings are large. Because it is part of the plant support process, while it is in use most days, it is often only used for 20 minutes per day. The design of the booth is such that the airflow goes from side to side rather than front to back; this means that only one person can spray at a time – more than one operator, and only the upwind operator isn't covered in overspray. Because the paint booth is large, multiple paint gun attachment points are present in the booth. The decision to use multiple attachment points for the paint gun means that the operator isn't required to drag a long hose around in the booth to paint large parts. Because only one operator is in the booth spraying paint, it is simpler to move the spray gun between attachment points when painting a large part that it is to clean multiple paint guns. For these practical and design reasons, it is not felt that a condition to demonstrate that only one gun is used at a time is necessary.

Mr. Fred Ducharme
TG Missouri Corporation
2200 Plattin Road
Perryville, MO 63775

Re: Part 70 Operating Permit Renewal
Installation ID: 157-0019, Permit Number: OP2019-030

Dear Mr. Ducharme:

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: 2012-10-002

MISSOURI DEPARTMENT OF NATURAL RESOURCES FOLDER TRANSMITTAL ROUTING SHEET	**Operating Permits**

TG Missouri Corporation 2012-10-002

Originator: Kasia Wasescha | Telephone: AAA.PPP.#### | Date: October 17, 2019

Typist: Joann Husong

File Name: P:\APCP\Permits\Executive Review Projects\2012-10-002 TG Missouri Corporation 157-0019\Public Notice and Comments\157-0019 TG Missouri Corporation 2012-10-002 draft OP.docx

SIGNATURE APPROVAL OF:

☐ Program Director ☐ Section Chief ☐ Unit Chief

ROUTE TO:

			Submitted	Returned
☐	Unit Chief – Initial Review	Date:		
☐	Unit Chief – Response to Comments	Date:		
☐	Section Chief	Date:		
☐	Program Director	Date:		

Comments: