

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

# INTERMEDIATE STATE PERMIT TO OPERATE

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

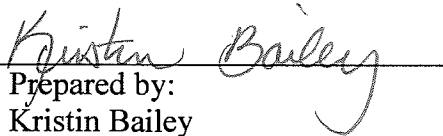
**Intermediate Operating Permit Number:** OP2017-026  
**Expiration Date:** MAR 22 2022  
**Installation ID:** 510-0097  
**Project Number:** 2016-07-039

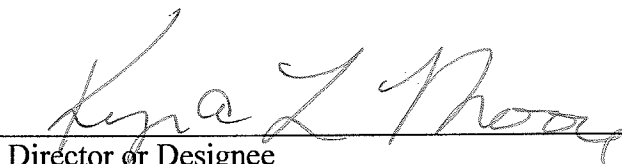
## Installation Name and Address

U. S. Paint Corporation  
831 South 21st Street  
St. Louis, MO 63103

## **Installation Description:**

U.S. Paint Corporation (US Paint) is a paint manufacturer (SIC 2851) located in an industrial area south of downtown St. Louis. The installation is an existing synthetic minor source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The installation also has the potential to emit less than de minimis levels of particulate matter less than or equal to ten microns (PM<sub>10</sub>). US Paint develops and manufactures high performance paints and primers for specialized industrial and Original Equipment Manufacturer (OEM) markets. Raw materials such as resins, solvents and pigments are received via drums, bags and bulk. They are gathered, mixed and processed per the instructions on a batch ticket. Once tested and approved by quality control the finished products are packaged in containers ranging in size from one pint to 250 gallons, stored in warehouses on site and then distributed to customers via trucks.

  
Prepared by:  
Kristin Bailey  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources  
MAR 22 2017

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations. These units are also subject to all plant wide limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-2A	Five Shading Air Mixers (D/PM16, D/PM17, D/PM18, D/PM19 and D/PM20)
EP-2B	2000 Gallon Mixing Tank (Tank 9) (D/TKM#9)
EP-2C	Premier Submersible Mill (D/PSM400)
EP-2D	Three (3) Premier Submersible Mills (D/PSM300, D/PSM200, D/PSM100)
EP-2E	Hockmeyer Paddle Mixer (C/PM1)
EP-2F	Paddle Mixer (C/PM2)
EP-2G	Dust Collectors (D/DC1, E/DC1, NDC1, SB/DC1)
EP-2H	Isocyanate Mixers – Lightnin
EP-2I	PSM700 Submersible Mill (D/PSM700)
EP-2J	Five (5) Bank of Mixers (D/PM11, D/PM12, D/PM13, D/PM14, D/PM15)
EP-2K	Horizontal Mill in Small Batch (SB/HM2)
EP-07	Expansion Area Spray Booth
EP-10	Automotive/Industrial Laboratory Spray Booth (Lab #3 Mill Room)
EP-15	Tank Washer (E/TW)
EP-16	Paint Spray Booth in Quality Control Lab #2
EP-18A	60,000 gallon aboveground storage tank, subdivided into 5 compartments of various sizes.
EP-18B	60,000 gallon aboveground storage tank, subdivided into 5 compartments of various sizes
EP-18C	60,000 gallon aboveground storage tank, subdivided into 5 compartments of various sizes
EP-19A	Parts Washer
EP-19B	Drum/Container Washing Process

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. These units are also subject to all plant wide limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
NA	Miscellaneous Laboratory Equipment including the following:
NA	Miscellaneous Small Batch Equipment including the following:
EP-2L	Filling Machine, C/NFM4, Ideal-Pak Inc., ME1-CBM
EP-2M	Paddle Mixer, Lightnin X59300A
EP-2N	Horizontal Mill – Construction Permit 102016-006
EP-2O	Basket Mill - Construction Permit 102016-006
EP-2P	Five Mixers - Construction Permit 102016-006
EP-2Q	Paint Mixer and Filler, September 2015, X5P300A, Lightnin
NA	Natural Gas Heaters

Emission Unit #	Description of Emission Unit
EP-2R	Grouping of Fugitive Emissions which include the following: <ul style="list-style-type: none"> <li>- Four (4) can/drum fillers (C/DFM1, C/DFM2, C/DFM3, C/DFM4)</li> <li>- One (1) Paddle Mixer (C/PM3)</li> <li>- Four (4) Myers Mixers (D/D1, D/D10, E/D1, E/D6)</li> <li>- One (1) Hockmeyer press (fairing compound filler in C building)</li> <li>- Two (2) twin tanks each with 750 gal capacity and One (1) Myers Mixer (D/D13, D/D14)</li> <li>- Myers mixer with 1.5k gal tank (D/D12)</li> <li>- Kady Mixer (D/KD1)</li> <li>- Cowles Mixers (D/D7, D/PM6, E/D2, E/D5, E/PM3, E/D3, E/D7)</li> <li>- Mixer (D/D9)</li> <li>- Wall tanks D-1 through D-8, 2300 gal, Top fill; 5 HP (D/TKM#1, D/TKM#2, D/TKM#3, D/TKM#4, D/TKM#5, D/TKM#6, D/TKM#7, D/TKM#8)</li> <li>- Sandmill (D/SM2)</li> <li>- Horizontal Mill (D/HM3, D/HM9, D/HM12)</li> <li>- Solvent/Resin pump station</li> </ul>
EP-05	<ul style="list-style-type: none"> <li>- Quality Control Paint Spray Booth #1 with Dry Filters</li> </ul>
EP-08	<ul style="list-style-type: none"> <li>- Lab #1 Spray booth</li> </ul>
EP-09	<ul style="list-style-type: none"> <li>- Lab #2 Spray booth</li> <li>- Various Mixers</li> <li>- Various ovens</li> <li>- Various Horizontal Mills</li> <li>- Various environmental testing equipment</li> <li>- Wash tanks (contains acetone)</li> </ul>
EP-06	<ul style="list-style-type: none"> <li>- Small Batch Spray Booth with Dry Filters</li> <li>- 3 small batch ovens</li> <li>- 1 small batch horizontal sand mill</li> <li>- 16 Fawcett air mixers – high speed mixer</li> <li>- Wash tanks (contains acetone)</li> </ul>
EP-11	Distillation Unit (entire distillation) process is made up of the following: <ul style="list-style-type: none"> <li>- One Vessel with a 5 HP motor</li> <li>- One 545 gallon dirty solvent tank</li> <li>- One 60 gallon clean solvent tank</li> <li>- One 600 gallon clean solvent tank</li> </ul>
NA	20 Above Ground Storage Tanks in Hot Room <ul style="list-style-type: none"> <li>- Tank 1A – 2700 gallons</li> <li>- Tank 1B – 2700 gallons</li> <li>- Tank 2A – 2700 gallons</li> <li>- Tank 2B – 2700 gallons</li> <li>- Tank 3A – 2700 gallons</li> <li>- Tank 3B – 2700 gallons</li> <li>- Tank 4A – 2700 gallons</li> <li>- Tank 4B – 2700 gallons</li> <li>- Tank 5A – 2000 gallons</li> <li>- Tank 5B – 2000 gallons</li> <li>- Tank 6A – 2000 gallons</li> <li>- Tank 6B – 2000 gallons</li> <li>- Tank 7A – 2000 gallons</li> <li>- Tank 7B – 2000 gallons</li> <li>- Tank 8A – 2000 gallons</li> <li>- Tank 8B – 2000 gallons</li> <li>- Tank 9A – 2000 gallons</li> <li>- Tank 9B – 2000 gallons</li> <li>- Tank 10A – 2000 gallons</li> <li>- Tank 10B – 2000 gallons</li> </ul>

## II. Plant Wide Emission Limitations

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

### **Permit Condition PW001**

10 CSR 10-5.390 Control of Emissions From Manufacture of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products

#### **Operational Limitation/Equipment Specifications:**

The permittee shall not cause or allow the manufacture of paints, varnishes, lacquers, enamel or other allied surface coating products unless the operating equipment meets the requirements contained in this rule and without adhering to operating procedures specified in this rule and operating procedures recommended by the equipment manufacturer and approved by the Director.

- 1) The permittee shall equip tanks storing VOC with a vapor pressure greater than or equal to 10 kilopascals (kPa) (1.5 psi) at twenty degrees Celsius (20°C) with a pressure/vacuum conservation vents set at  $\pm 0.2$  kPa (0.029 psi), except where more effective air pollution control is used. Stationary VOC storage containers with a capacity greater than two hundred fifty (250) gallons shall be equipped with a submerged-fill pipe or bottom fill, except where more effective air pollution control is used and has been approved by the Director.
- 2) The permittee shall install covers on all open-top tanks used for the production of non-waterbase coating products. These covers shall remain closed except when production, sampling, maintenance or inspection procedures require operator access.
- 3) The permittee shall install covers on all tanks containing VOC used for cleaning equipment.
- 4) The permittee shall operate and maintain all grinding mills in accordance with manufacturers' specifications.

#### **Monitoring/Recordkeeping:**

- 1) The permittee shall keep records on production rates to determine daily VOC emissions. Attachment M or equivalent forms approved by the Air Pollution Control Program shall be used for this purpose.
- 2) The permittee shall keep records for a period of not less than five (5) years and make all of these records available to Missouri Department of Natural Resources' personnel upon request.

#### **Reporting:**

- 1) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

**PERMIT CONDITION PW002**

10 CSR 10-6.065 Operating Permits and/or  
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit 102016-006, Issued October 24, 2016 Special Condition 2  
Construction Permit 122015-006, Issued December 10, 2015 Special Condition 4

**Emission Limitation:**

- 1) The permittee shall emit into the atmosphere less than 100.0 tons of volatile organic compounds (VOCs) from the entire installation in any consecutive 12-month period. [Special Condition 2A]
- 2) The permittee shall emit less than ten tons of any individual hazardous air pollutant (HAP) into the atmosphere from the entire installation during any consecutive 12-month period. [Special Condition 2B]
- 3) The permittee shall emit less than 25 tons of hazardous air pollutants (HAPs) in aggregate into the atmosphere from the entire installation during any consecutive 12-month period. [Special Condition 2B]

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an accurate record of VOCs and HAPs emitted into the atmosphere from the installation. Attachment A, B and C1 or equivalent forms approved by the Air Pollution Control Program shall be used for this purpose.
- 2) The permittee shall maintain on file safety data sheets (SDS) or other data sufficient to document the percent HAP and VOC constituents in the materials used.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Operational Limitation:**

The permittee shall keep all coatings and chemical solutions in closed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all coatings and chemical solution containers used with this equipment. [Special Condition 4A]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

**PERMIT CONDITION PW003**

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations  
40 CFR Part 63 Subpart A General Provisions and  
40 CFR Part 63 Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for  
Area Sources: Paints and Allied Products Manufacturing

**Operational Limitation:**

- 1) The permittee shall add the dry pigments and solids that contain compounds of chromium and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids

that contain compounds of chromium to a process vessel or to the grinding and milling process.  
[§63.11601(a)(1)]

- 2) The permittee shall capture particulate emissions and route them to a particulate control device during the addition of dry pigments and solids that contain compounds of chromium to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.  
[§63.11601(a)(2)]
- 3) The permittee shall capture particulate emissions and route them to a particulate control device during the addition of dry pigments and solids that contain compounds of chromium to the grinding and milling process or add pigments and other solids that contain compounds of chromium to the grinding and milling process only in paste, slurry, or liquid form. [§63.11601(a)(3)(i)(ii)]
- 4) The permittee shall capture particulate emissions and route them to a particulate control device during the grinding and milling of materials containing compounds of chromium or fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of chromium or ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of chromium. [§63.11601(a)(4)(i)(ii)(iii)]
- 5) The permittee shall ensure that the particulate control device exhaust does not exceed 10% opacity for particulate control devices that vent to the atmosphere. [§63.11601(a)(5)]

**Performance Testing/Monitoring/Recordkeeping:**

- 1) The permittee shall perform periodic inspections of each wet PM control device according to the following requirements: [§63.11602(a)(2)(i)]
  - a) The permittee shall conduct a daily inspection to verify the presence of water flow to the wet particulate control system.
  - b) The permittee shall conduct weekly visual inspections of any flexible ductwork for leaks.
  - c) The permittee shall conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.
- 2) The permittee shall perform periodic inspections of each dry PM control device according to the following requirements: [§63.11601(a)(2)(ii)]
  - a) The permittee shall conduct weekly visual inspections of any flexible ductwork for leaks.
  - b) The permittee shall conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.
- 3) The permittee shall, for each particulate control device, conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of chromium to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, the permittee must conduct a Method 203C (40 CFR part 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of chromium HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in §63.11601(a)(5), the permittee must comply with the following requirements:  
[§63.11601(a)(2)(iii)]
  - i) The permittee shall take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of chromium to a process vessel or to the grinding and



- milling equipment. The permittee must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in §63.11601(a)(5).
- ii) The permittee shall prepare a deviation report in accordance with §63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in §63.11601(a)(5).
  - iii) The permittee shall resume the visible determinations of emissions from the particulate control device as listed in paragraph (c) above.
- 4) The permittee shall record the following information for each inspection and testing activity:
    - a) The date, place, and time;
    - b) Person conducting the activity;
    - c) Technique or method used;
    - d) Operating conditions during the activity;
    - e) Results; and
    - f) Description of correction actions taken.
  - 5) The permittee shall maintain the following records for five years after the date of each recorded action.
    - a) The permittee shall keep a copy of each notification and all documentation supporting any Notification of Applicability and Notification of Compliance Status that the permittee submitted.
    - b) The permittee shall keep records of all inspections and tests as required by §63.11602(b).
    - c) The permittee shall keep all records in a form suitable and readily available for expeditious review, according to §63.10(b)(1).
    - d) The permittee shall keep the records onsite for two years after the date of each recorded action. The records may be kept offsite for the remaining three years.
  - 6) The permittee shall keep records on inspections for the wet and dry particulate matter control devices. Attachment I or equivalent forms approved by the Air Pollution Control Program shall be used for this purpose.
  - 7) The permittee shall keep records on all visual determinations. Attachment F or equivalent forms approved by the Air Pollution Control Program shall be used for this purpose.

### **Reporting**

- 1) The permittee shall prepare an annual compliance certification report and submit it 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, according to the following requirements. This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report. [63.11603]
  - a) Dates. The permittee must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in paragraphs (b)(1)(i) through (iii) of this section.
    - i) The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.
    - ii) Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.
    - iii) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.
  - b) General Requirements. The annual compliance certification report must contain the information specified below:
    - i) Company name and address;

- ii) A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and
- iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
- c) Deviation Report. If a deviation has occurred during the reporting period, the permittee must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with the annual compliance certification report.

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.060 Construction Permits Required Saint Louis City Construction Permit 98-08-055, Issued August 24, 1998 Saint Louis City Construction Permit 98-08-055A, Issued April 29, 2005	
Emission Unit	Description
EP-18	Three 60,000 gallon above ground stainless steel storage tanks, subdivided into five separate compartments each, for a total of fifteen compartments. Constructed August 24, 1998

**Emission Limitation:**

The permittee shall not exceed one (1) ton total VOC emissions from all tanks combined in any rolling 12-month period. [Special Condition II. A.]

**Operational Limitation/Equipment Specification:**

- 1) The permittee shall equip tanks storing VOC containing material with a vapor pressure greater than or equal to 1.5 pounds per square inch (psi) at 20 degree Celsius (20°C) with a pressure/vacuum conservation vents set at  $\pm 0.2$  kilopascals (kPa) (0.029 pound per square inch gauge (psig)) or greater except where more effective air pollution control is used and approved by the Director. [Special Condition III.A.]
- 2) The permittee shall equip all tanks with submerged fill pipes or bottom fill pipes and these pipes shall be used to fill tanks. [Special Condition III.B.]

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain a total monthly VOC emissions calculation and a rolling 12-month total of VOC. [98-08-055A]
- 2) The permittee shall utilize Attachment C2 or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the Emission Limitation.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 002</b>		
10 CSR 10-6.060 Construction Permits Required		
Saint Louis City Construction Permit 95-01-014R, Issued August 24, 1998		
Emission Unit	Description	Manufacturer/Model No.
EP-16	DeVilbiss Paint Spray Booth in QC Lab (#2) – Quality control lab Spray booth used for spraying panels. Equipped with a dry filter system to control emissions of particulate matter.	DeVilbiss./PCL886-125

**Emission Limitation:**

The permittee shall not use more than 200 gallons per twelve (12)-month rolling basis of paint, including topcoats, primers, and enamels, and not more than 300 gallons per twelve (12)-month rolling basis of cleaning solvents (2-Butanone). [Special Condition 1A]

**Operational Limitation:**

- 1) The permittee shall operate and maintain the spray booth in accordance with the manufacturer's operating instructions. [Special Condition 1B]
- 2) The permittee shall keep all containers of paints, coatings, thinners, cleaning solvents, and any other VOC or lead containing materials covered, except during usage. [Special Condition 1C]
- 3) The permittee shall not emit any visible emissions from the spray paint operations into the ambient air. [Special Condition 1D]
- 4) The permittee shall ensure that the dry filter is in place when spraying is being performed and that the device is being operated and maintained using good engineering practices. [Special Condition 1E]

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep records to demonstrate compliance with the throughput limitations. Attachment L or equivalent, approved by the Air Pollution Control Program shall be used. [Special Condition 3A]
- 2) The permittee shall maintain maintenance records for control equipment, including filter changes, utilizing Attachment I or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program. [Special Condition 3D]
- 3) The permittee shall monitor the spray booths for visible emissions using Attachment F, G or an equivalent form approved by the Air Pollution Control Program.
- 4) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 003</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit 98-01-005, Issued May 24, 1998		
Emission Unit	Description	Manufacturer
EP-2A	Five (5) shading air mixers (D/PM16, D/PM17, D/PM18, D/PM19, D/PM20) used to blend paint in portable tanks	Lightnin Mixers

**Emission Limitation:**

The permittee shall limit the quantity of paint shaded under the mixers to no more than 227,500 gallons on a twelve (12)-month rolling basis.

**Operational Limitation/Equipment Specification:**

- 1) The permittee shall install covers on all open top tanks used for the production of non-waterbased coating products. These covers shall remain closed except when production, sampling, maintenance or inspection procedures require operator access.
- 2) The permittee shall install covers on all tanks containing VOCs used for cleaning equipment. These covers shall remain closed except when operator access is required.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of quantities of shaded paint under these five (5) mixers on a twelve (12)-month annual average basis, utilizing Attachment L or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program.
- 2) The permittee shall keep maintenance logs on the mixing equipment utilizing Attachment I or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report spills of 20 gallons or greater to the Air Pollution Control Program's Compliance/Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 004</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit 99-07-049S, Issued October 1, 1999		
Emission Unit	Description	Manufacturer/ Model No.
EP-2B	2,000 gallon mixing tank (Tank 9) (D/TKM 09) – A wall tank used for mixing paint	5HP Lightnin

**Emission Limitation:**

- 1) The permittee shall limit the throughput in mixing tank No. 9 of typical VOC-based paint to 208,000 gallons in any consecutive twelve (12)-month period.
- 2) The permittee shall limit the throughput of methyl ethyl ketone (MEK) cleaning solution to 6,240 gallons in any consecutive twelve (12)-month period.
- 3) The permittees shall not exceed the limit of the total VOC emissions (including volatile HAPs) from mix tank No. 9 of 14.4 tons per any consecutive twelve (12)-month period. Emissions of Total HAPs shall not exceed 6.5 tons per any consecutive twelve (12)-month period. Emissions of MEK shall not exceed 1.7 tons per any consecutive twelve (12)-month period.

**Operational Limitation:**

Containers shall be covered to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep records of the amount and type of finished product, the amount of MEK used to clean the tank, the emissions of VOC and HAP pollutants, and the emissions of MEK from paints and cleaning solution utilizing Attachments A, B and/or C1 or equivalent forms, such as an electronic forms, approved by the Air Pollution Control Program.
- 2) The permittee shall develop and use forms to demonstrate compliance with the emission limitations. The forms shall include records of raw materials used, chemical usage, solvent recovery and twelve (12)-month rolling totals of paint and cleaning solution throughput.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report spills of 20 gallons or greater to the Air Pollution Control Program's Compliance/Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 005</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit 99-07-052, Issued December 24, 1999		
Emission Unit	Description	Manufacturer/ Model No.
EP-10	Automotive/Industrial Paint Spray Booth (Lab #3 Mill Room) – Spray booth used for spraying panels/parts for research and development purposes. Equipped with a dry filter system to control emissions of particulate matter.	Binks/ DWG No. 808652

**Emission Limitation:**

- 1) The permittee shall limit the throughput of typical VOC-based paint to 260 gallons sprayed through the booth in any consecutive twelve (12)-month period.
- 2) The permittee shall limit the throughput of cleaning solution to 312 gallons sprayed through the booth in any consecutive twelve (12)-month period.
- 3) The permittee shall limit the rate of PM<sub>10</sub> emissions to 0.46 pounds per hour in any one (1)-hour period.
- 4) The permittee shall ensure that all paint overspray shall pass through a filter with a control efficiency of ninety-seven percent (97%) or better for PM<sub>10</sub> and that the dry filter system is being operated and maintained using good engineering practices.

**Monitoring:**

The permittee shall perform visual inspections for any deficiencies or damage to this control device on a monthly basis. If any deficiencies or damage have been assessed, then spraying operations shall cease until proper maintenance or replacement of the control device has occurred.

**Recordkeeping:**

- 1) The permittee shall either develop and use forms to demonstrate compliance with the emission limitations or utilize the attachments, which shall include the following:
  - a) The twelve (12)-month rolling totals of paint throughput and cleaning solvent throughput utilizing attachment L or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program;
  - b) PM<sub>10</sub> emissions utilizing attachment N or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program; and
  - c) Visual inspection and/or maintenance performed on the control device utilizing attachment I or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 006</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit 00-07-036, Issued October 8, 2000		
Emission Unit	Description	Manufacturer/ Model No.
EP-2C	Premier Submersible Mill – Used to blend paint and achieve desired pigment size.	Premier/ PSM 400

**Emission Limitation:**

- 1) The permittee shall limit the throughput in the mill of typical VOC-based raw materials and/or shading paints to 110,000 gallons in any consecutive twelve (12)-month period.
- 2) The permittee shall limit the throughput of MEK cleaning solution in the mill to 21,990 gallons in any consecutive twelve (12)-month period.

**Operational Limitation:**

The permittee shall cover all containers to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) The permittee shall develop and use forms to demonstrate compliance with the emission limitations. The forms shall include records of the following:
  - a) Amount and type of finished product;
  - b) Material throughput;
  - c) MEK cleaning solution throughput;
  - d) Emissions of VOC and HAP pollutants; and
  - e) Emissions of MEK from paints and cleaning solution.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report spills of 20 gallons or greater to the Air Pollution Control Program's Compliance/Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.



<b>PERMIT CONDITION 007</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit 01-01-052, Issued March 30, 2001		
Emission Unit	Description	Manufacturer/ Model No.
EP-2D	Three Premier Submersible Mills – Used to blend paint and achieve desired pigment size.	Premier/PSM 300, PSM 200 & PSM 100

**Emission Limitation:**

The permittee shall limit each premier submersible mill to emissions of no more than the following in any consecutive twelve (12)-month period;

- 1) 2.90 tons of total VOC;
- 2) 1.41 tons of HAPs; and
- 3) 0.45 ton of MEK.

**Operational Limitation:**

The permittee shall cover all containers to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) The permittee shall develop and use forms to maintain records of the following:
  - a) Amount and type of finished product;
  - b) Material throughput;
  - c) MEK cleaning solution throughput;
  - d) Emissions of VOC and HAP pollutants; and
  - e) Emissions of MEK from paints and cleaning solution.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 008</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit 02-02-010, Issued October 7, 2002		
Emission Unit	Description	Manufacturer/ Model No.
EP-2F	Hockmeyer Paddle Mixer – Mixer used to blend paint.	Hockmeyer/ 25001

**Emission Limitation:**

- 1) The permittee shall limit VOC emissions from the Hockmeyer paddle mixer to less than 3.86 tons in any consecutive twelve (12)-month period.
- 2) The permittee shall limit HAPs emissions from the Hockmeyer paddle mixer to less than 1.70 tons in any consecutive twelve (12)-month period.

**Operational Limitation:**

The permittee shall cover all containers to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of VOC and HAPs emissions and the throughput for the Hockmeyer paddled mixer for every consecutive twelve (12)-month period utilizing Attachments A, B and/or C1 or equivalent forms, such as an electronic forms, approved by the Air Pollution Control Program.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report spills of 20 gallons or greater to the Air Pollution Control Program's Compliance/Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.
- 4) The permittee shall report spills of 20 gallons or greater to the Air Pollution Control Program's Compliance/Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.

<b>PERMIT CONDITION 009</b>		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 01-05-012, Issued December 9, 2001		
Construction Permit 03-06-010, Issued September 18, 2003		
Emission Unit	Description	Manufacturer/ Model No.
EP-2F	Paddle Mixer – Mixer used to blend paint.	Hockmeyer

**Emission Limitation:**

- 1) The permittee shall limit VOC emissions from the Hockmeyer paddle mixer to less than 4.86 tons in any consecutive twelve (12)-month period.
- 2) The permittee shall limit HAPs emissions from the Hockmeyer paddle mixer to less than 2.13 tons in any consecutive twelve (12)-month period.

**Operational Limitation:**

The permittee shall cover all containers to minimize the VOC emissions. These covers shall remain closed, except when adding material, sampling, maintenance, or inspection procedures require operator access.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of VOC and HAPs emissions and the throughput for the Hockmeyer paddle mixer for every consecutive twelve (12)-month period. Due to the diversity of paint products used for the batch operation, emission calculations for VOCs and HAPs shall be calculated on a “product series” basis, utilizing Attachments A, B and/or C1 or equivalent forms, such as an electronic forms, approved by the Air Pollution Control Program
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

- 1) The permittee shall report spills of 20 gallons or greater to the Air Pollution Control Program’s Compliance/Enforcement Section within a reasonable time, not to exceed 5:00 p.m. the following business day.
- 2) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 010</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit 04-01-001, Issued February 11, 2004		
Emission Unit	Description	Manufacturer/ Model No.
EP-7	Expansion Area Spray Booth – Spray booth used for spraying panels/parts for R&D purposes. Equipped with a dry filter system to control emissions of particulate matter.	Global Finishing Solutions/RFD-87-S

**Emission Limitation:**

The permittee shall limit VOC emissions from the spray booth to less than 1.0 ton in any consecutive twelve (12)-month period.

**Operational Limitation:**

- 1) The permittee shall perform visual inspection for any deficiencies or damages to the control device on a monthly basis. If any deficiencies or damages have been assessed, then spraying operations shall cease until proper maintenance or replacement of the control device has occurred.
- 2) The permittee shall ensure that the dry filter is in place when spraying is being performed and that the device is being operated and maintained using good engineering practices.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain records of dry filter inspection, maintenance activities, and corrective maintenance actions taken by the permittee to ensure optimal performance of the filter using Attachment I or an equivalent form approved by the Air Pollution Control Program.
- 2) The permittee shall maintain monthly records of VOC emissions from the paint booth on a consecutive twelve (12)-month basis using Attachment C1 or an equivalent form approved by the Air Pollution Control Program.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 011</b>	
10 CSR 10-6.400 Restriction of Emissions of Particulate Matter from Industrial Processes	
Emission Unit	Description
EP-2G	Dust Collectors (D/DC1, E/DC1, N/DC1, SB/DC1) – Used to capture excess pigment while dumping pigment.

**Emission Limitation:**

The permittee shall not allow, or permit the emission of particulate matter from the dust collectors in excess of 0.3 grains per standard cubic foot of exhaust gases.

**Monitoring:**

The permittee shall perform the following monitoring and maintenance on the baghouse operation to ensure proper operation:

- 1) Check and document the pressure drop across the filter element at least bi-monthly. The pressure drop across the filter shall be maintained within the range of 0.2 to 6.0 inches of water. If the pressure drop falls out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal.
- 2) Check the cleaning sequence of the baghouse semi-annually.
- 3) Thoroughly inspect bags for leaks and wear semi-annually.
- 4) Inspect every six (6) months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.
- 5) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented within eight (8) hours. Bag replacement should be documented. Maintain a written record of the inspection and any action resulting from the inspection. All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacture's specifications.

**Recordkeeping:**

- 1) The permittee shall maintain records to verify compliance with the baghouse monitoring. These records shall include bi-monthly filter pressure drop indicator readings, all inspections and corrective actions, and all dates of filter replacement. (See Attachments D and E)
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 012</b>	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-2G	Dust Collectors (D/DC1, E/DC1, N/DC1, SB/DC1) – Used to capture excess pigment while dumping pigment.

**Emission Limitation:**

- 1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20 percent.
- 2) Exception:
  - a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40 percent opacity.
  - b) A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) Observations must be made once per month.
  - b) If a violation is noted, then weekly observations shall be conducted for a minimum of eight (8) consecutive weeks.
  - c) Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results (See Attachment F), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment G)
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 013</b>		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 05-08-005, Issued October 4, 2005		
Emission Unit	Description	Manufacturer/ Model No.
EP-15	Tank Washer – Stationary tank washer that is used to wash portable tanks	Hockmeyer Equipment/CMX100

**Emission Limitation:**

- 1) The permittee shall not emit more than 20 tons of VOC from the tank washing operation in any consecutive 12-month period;
- 2) The permittee shall not emit more than 11 tons of combined HAPs from the tank washing operation in any consecutive 12-month period; and

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of total VOC, total HAPs and individual HAP emissions, including a calculated total for every consecutive twelve (12)-month period, utilizing Attachments A, B and/or C1 or equivalent forms, such as an electronic forms, approved by the Air Pollution Control Program.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 014</b>		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 06-05-009, Issued August 31, 2006		
Emission Unit	Description	Manufacturer/Model No.
EP-2I	PSM700 Submersible Mill Used to blend paint and achieve desired pigment size	Premier/PSM700

**Emission Limitation:**

The permittee shall limit each Premier submersible mill to emissions of no more than the following in any consecutive 12-month period:

- 1) 7.02 tons of total VOCs;
- 2) 1.11 tons of total HAPs; and
- 3) Screening Model Action Levels (SMAL):

Chemical	Level
Vinyl Acetate.....	1.0 ton
Carbon Tetrachloride.....	1.0 ton
Ethyl Acrylate.....	1.0 ton
Hexamethylene, 1-6 diisocyanate.....	0.02 ton
Chemical	Level
Nickel Compounds.....	1.0 ton
Phenol.....	0.1 ton
Styrene.....	1.0 ton
Acetophenone.....	1.0 ton
Diphenylmethane diisocyanate .....	0.1 ton

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of total VOC and total HAPs emissions, including a calculated total for every consecutive twelve (12)-month period of time, utilizing Attachments A, B and/or C1 or equivalent forms, such as an electronic forms, approved by the Air Pollution Control Program.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 015</b>		
10 CSR 10-5.300 Control of Emissions from Solvent Cleaning		
Emission Unit	Description	Manufacturer/ Model No.
EP-19A	Safety Kleen Parts Washers	Safety Kleen/ Model 81.8, Serial # 2149

**Emission Limitation:**

- 1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)).
- 2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The Director and the U.S Environmental Protection Agency (EPA) must approve the alternative method.

**Operational Limitation/Equipment Specification:**

- 1) The permittee shall keep each cold cleaner covered to prevent the escape of solvent vapors from the solvent bath while in the closed position, or in an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 2) The permittee shall, when one or more of the following conditions exist, design the cover to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
  - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
  - b) The solvent is agitated; or
  - c) The solvent is heated.
- 3) The permittee shall utilize an internal drainage facility for each cold cleaner so that parts are enclosed under the cover while draining.
- 4) The permittee shall have an external drainage facility for the cold cleaner which provides for the solvent to drain back into the solvent bath if an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F).



- 5) The permittee shall use a solid fluid stream of solvent spray, if utilizing solvent sprays, (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
- 6) The permittee shall affix a permanent conspicuous label summarizing the operating procedures to the equipment or in a location readily visible during operation of the equipment.
- 7) The permittee shall use one of the following control devices for any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F):
  - a) A freeboard ratio of at least 0.75;
  - b) Water cover (solvent must be insoluble in and heavier than water); or
  - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems must receive approval from the Director and EPA prior to their use.
- 8) The permittee shall operate each cold cleaner as follows:
  - a) The permittee shall close cold cleaner covers whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
  - b) The permittee shall drain cleaned parts in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
  - c) The permittee shall shut down the unit immediately whenever a cold cleaner fails to perform within the rule operating requirements and shall remain shut down until operation is restored to meet the rule operating requirements.
  - d) The permittee shall immediately repair solvent leaks or the cleaner shall be shut down until the leaks are repaired.
  - e) The permittee shall dispose of any waste material removed from a cold cleaner by one of the following methods or an equivalent method approved by the Director and EPA:
    - i) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or
    - ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director and EPA.
  - f) The permittee shall store waste solvent in covered containers only.
- 9) The permittee shall have trained operators as follows:
  - a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
  - b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
  - c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment J):
  - a) Name and address of the solvent supplier.
  - b) Date of purchase.
  - c) Type of solvent purchased.
  - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (See Attachment H) The record also shall include maintenance

and repair logs that occurred on the degreaser. (Attachment I) These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.

- 3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment K)
- 4) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 016</b>		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 07-02-001, Issued April 20, 2007		
Construction Permit 08-10-017, Issued October 30, 2008		
Emission Unit	Description	Manufacturer/ Model No.
EP-2J	Five (5) Bank of Mixers (D/PM11, D/PM12, D/PM13, D/PM14, D/PM15) – Mixers used to blend paint in portable tanks	Leeson Electric Co./ DVJ182TTGS4033ARL

**Emission Limitation:**

- 1) The permittee shall not exceed 40 tons of VOC from the mixers in any consecutive 12-month period;
- 2) The permittee shall not exceed the Maximum Design Capacity (MDC) of 9,000 gallons of paint per day for the five (5) Bank mixers.
- 3) The permittee shall not emit individual HAPs in excess of the Screen Model Action Level (SMAL) as listed in Table 2 or Table 6 of Construction Permit No. 07-02-001.

**Monitoring/Recordkeeping:**

- 1) The permittee shall keep monthly records of total VOC emissions, including a calculated total for every consecutive twelve (12)-month period of time utilizing Attachment C1 or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program
- 2) The permittee shall keep the daily records of the throughput of the mixers in order to ensure that the MDC reported in the Construction Permit Application (Permit No. 07-02-001) is not exceeded.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall notify the Air Pollution Control Program's Compliance/Enforcement section in writing within 15 days of emissions of any HAPs that are not listed in Table 2 or Table 6 of Construction Permit No. 07-02-001.
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.

- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

<b>PERMIT CONDITION 017</b>		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 07-02-001, Issued April 20, 2007		
Construction Permit 08-10-017, Issued October 30, 2008		
Emission Unit	Description	Manufacturer/ Model No.
EP-2K	Horizontal Mill in Small Batch (SB/HM2) – For paint or coating manufacture.	Dyno

**Emission Limitation:**

- 1) The permittee shall not process more than four (4) 15-gallon batches through the mill each month.
- 2) The permittee shall not process more than one (1) 15-gallon batch through the mill in any four (4) hour period.
- 3) The permittee shall ensure HAP emissions rate from the horizontal mill to be less than 0.5 lb/hr.

**Operational Limitation:**

The permittee shall ensure that the horizontal mill and any containers used in the handling of materials and the processing of batches are equipped with a cover and shall be kept closed when not in use.

**Monitoring/Recordkeeping:**

- 1) The permittee shall develop and maintain the following records:
  - a) Number of batches processed through the horizontal mill each month, including date, hours and batch size;
  - b) HAP content of each batch processed through the mill; and
  - c) Copies of the Safety Data Sheets (SDS) for the finished product and for all raw materials used in each product processed through the mill.
- 2) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by Section V of this permit.

## IV. Core Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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

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

**10 CSR 10-6.150 Circumvention**

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

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

**This requirement is not federally enforceable.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

**Emission Limitation:**

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

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

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

- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

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

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

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

**10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations  
(Rescinded on February 11, 1979, Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*



## V. General Permit Requirements

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

### **10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
    - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

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

**10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

None

**10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
- a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
- a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

<b>10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions</b>
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- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

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

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

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

**VI. Attachments**

Attachments follow.

**Attachment A**  
 Monthly Individual HAP Compliance Worksheet

HAP Name: \_\_\_\_\_ CAS No.: \_\_\_\_\_

A	B
List materials that contain this HAP (Name, Type)	HAP emissions from Attachment I, column E (in Tons)
C Total Individual HAP Emissions for this Month, Tons	
D 12-Month Individual HAP Emissions Total F from Previous Month's Attachment A, Tons	
E Monthly Individual HAP Emissions Total C from Previous 12 Month's Attachment A, Tons	
F Current 12-month Total of HAP Emissions in Tons:	

- A. Individually list each material which emits this specific HAP.
- B. Record the Individual HAP emissions already calculated for Attachment B in [Column E] in Tons;
- C. Summation of Column B in Tons;
- D. Record the previous 12-Month individual HAP emission total F from last month's Attachment A, in Tons;
- E. Record the monthly HAP emission total C from previous 12-Month Attachment A (i.e. for January of 2017, obtain total from January 2016 worksheet), in Tons;
- F. Calculate the new 12-month individual HAP emissions total.  $F = C + D - E$ . A 12-Month individual HAP emissions total of less than 10.0 tons indicates compliance

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance/Enforcement section during the most recent 12-month period must be included in the rolling total.

**Attachment B**  
 Monthly Combined HAP Compliance Worksheet

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

A	B	C	D	E
Material Used, (Name, HAP CAS #)	Amount of Material Used (Include Units)	Density (lbs/gal)	HAP Content (Weight %)	HAP Emissions (Tons)
F HAP Emissions from Natural Gas Combustion				
G Total HAP Emissions Calculated for this Month in Tons				
H 12-Month HAP Emissions Total from Previous Month's Worksheet in Tons				
I Monthly HAP Emissions Total from Previous Year's Worksheet in Tons				
J Current 12-month Total of HAP Emissions in Tons				

- A. Record the name of each material used that contains a HAP. Compare ingredient names and CAS to the *Air Pollution Control Program Table of Hazardous Air Pollutants, Screening Model Action Levels, and Risk Assessment Levels*, Revision 11 for confirmation as a HAP. The materials must match those on Attachment A. Changes in coatings could result in varying amounts and types of HAPs emitted.
- B. Record the usage and units of the material. The usage must match Attachment A.
- C. Record the material density
- D. Record the HAP content from the SDS. If HAP content has a range, then use the highest value.
- E. Calculate the HAP emissions;
  - 1. If the usage is in tons  $E = B \times D$ ;
  - 2. If usage is in pounds  $E = B \times D / 2000$ ;
  - 3. If usage is in gallons  $E = B \times C \times D / 2000$ .
- F. Amount of HAP emissions estimated from the natural gas combustion for this month, in Tons;
  - a. Emission Factor (EF) = 0.0132 lbs/mmBtu, from AP42 Fifth Edition, Table 1.6-3
  - b. To calculate emissions = (EF \* amount of fuel consumed in mmBtu) /2000
- G. Sum the individual E.
- H. Record "H" from last month.
- I. Record "I" from this month last year.
- J. Current 12 month HAP emissions.  $I = (G + H - I)$ . A total less than 25.0 tons indicates compliance.

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Program's Compliance/Enforcement section during the most recent 12-month period must be included in the rolling total.

**Attachment C1**  
**Plant-Wide VOC Voluntary Emissions Limit**

This is an example of a form that may be used to record data required by Permit Condition PW002. In order to demonstrate compliance with the Permit Condition PW002, the permittee must demonstrate the installation emits less than 100 tons of VOC in any consecutive 12-month period.

VOC Containing Material (Name, Type)	Monthly Usage (tons)	VOC Content (percent)	VOC Emissions <sup>1</sup> (tons)
VOC Emission Source	Monthly Usage (MMscf)	VOC Emission Factor <sup>2</sup> (lb/MMscf)	VOC Emissions <sup>3</sup> (tons)
Natural Gas Combustion		5.5	
<b>Monthly VOC Emissions (ton/month):</b>			

<sup>1</sup>VOC Emissions (tons) = Monthly Usage (tons) x VOC Content (percent)

<sup>2</sup>The VOC Emission Factor was obtained from FIRE for Process SCC 10300603.

<sup>3</sup>VOC Emissions (tons) = Monthly Usage (MMscf) x VOC Emission Factor (lb/MMscf) x 0.0005 (ton/lb).

Date (Month/Year)	12-Month Rolling VOC Emissions <sup>4</sup> (ton/yr)

<sup>4</sup>12-Month Rolling VOC Emissions (ton/yr) = The sum of the most recent 12 Monthly VOC Emissions (ton/month). **12-Month Rolling VOC Emissions of less than 100 tons demonstrates compliance.**



**Attachment C2**  
 Permit Condition 001 - VOC Tracking Sheet for Tanks

<b>Emission Unit</b>	<b>Description</b>	<b>Chemical Stored/Used (Name and CAS No.)<sup>1</sup></b>	<b>Monthly Usage (1000 gallons)</b>	<b>Emission Factor (lbs/1000 gallons)<sup>2,3</sup></b>	<b>VOC Emissions (lbs/month)</b>
EP18A-1	Chemical Bulk Storage Tanks				
EP18A-2					
EP18A-3					
EP18A-4					
EP18A-5					
EP18B-1					
EP18B-2					
EP18B-3					
EP18B-4					
EP18B-5					
EP18C-1					
EP18C-2					
EP18C-3					
EP18C-4					
EP18C-5					
			<b>(cans)</b>	<b>(lbs/can)</b>	<b>(lbs/month)</b>
<b>VOC Emissions (lbs/month):</b>					

<sup>1</sup>The permittee shall document the chemical stored/used during the reporting period. When multiple chemicals were stored/used, the permittee shall list the chemical stored/used which has the highest volatility for VOCs.

<sup>2</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 or mass balance for the chemical stored/used.

<sup>3</sup>When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation.

**Attachment C2 - continued**  
 Permit Condition 001 - VOC Tracking Sheet for Tanks

<b>Tank Standing Losses</b>						
<b>Emission Unit</b>	<b>Description</b>	<b>Chemical Stored/Used (Name and CAS No.)<sup>1</sup></b>	<b>Tank Capacity (1000 gallons)</b>	<b>Emission Factor (lbs/1000 gallons-years)<sup>1,4</sup></b>	<b>VOC Emissions (tons/year)</b>	
EP18A-1	Chemical Bulk Storage Tanks					
EP18A-2						
EP18A-3						
EP18A-4						
EP18A-5						
EP18B-1						
EP18B-2						
EP18B-3						
EP18B-4						
EP18B-5						
EP18C-1						
EP18C-2						
EP18C-3						
EP18C-4						
EP18C-5						
<b>Building No. 1 Tank Standing Losses (tons/year):</b>						

<sup>1</sup>The permittee shall document the chemical stored/used during the reporting period. When multiple chemicals were stored/used, the permittee shall list the chemical stored/used which has the highest volatility for combined VOCs.

<sup>2</sup>Tank emission factors shall be obtained from EPA's TANKS 4.0 or mass balance for the chemical stored/used.

<sup>4</sup>When using SDS sheets to calculate the emissions, if there is a range of values, the highest value must be used for the calculation.







**Attachment G**  
**Method 9 Opacity Emissions Observation**  
**10 CSR 10-6.220 Compliance Demonstration**

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 M**  
Coating (paint, topcoats, primers, enamels, etc.) Production Tracking

Production Rates

A. Date/Time	B. Emission Unit	C. Type of Coating Manufactured	D. Operating Hours	E. Gallons of Coating Manufactured Per Hour	F. Total Coating Manufactured <sup>1</sup>

<sup>1</sup>Total Coating Manufactured = Operating Hours x Gallons of Coating Manufactured per Hour.



# STATEMENT OF BASIS

## Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee’s responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

## Installation Description

U.S. Paint Corporation (US Paint) is a paint manufacturer (SIC 2851) located in an industrial area south of downtown St. Louis. The installation is an existing synthetic minor source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The installation also emits less than de minimis levels of particulate matter less than or equal to ten microns (PM<sub>10</sub>). US Paint develops and manufactures high performance paints and primers for specialized industrial and OEM (Original Equipment Manufacturer) markets. Raw materials such as resins, solvents and pigments are received via drums, bags and bulk. They are gathered, mixed and processed per the instructions on a batch ticket. Once tested and approved by quality control the finished products are packaged in containers ranging in size from one pint to 250 gallons, stored in warehouses on site and then distributed to customers via trucks. The three 60,000 gallon tanks are split into 15 separate compartments, and are considered separate tanks as each is independent, with separate fill lines.

## Potential to Emit and Reported Air Pollutant Emissions, tons per year

Pollutants	Potential To Emit <sup>1</sup>	2015	2014	2013	2012	2011
Particulate Matter <sup>2</sup> ≤ Ten Microns (PM <sub>10</sub> )	0.16	0.06	0.07	5.28	4.50	3.07
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.16	0.06	0.06	5.09	--	--
Volatile Organic <sup>3</sup> Compounds(VOC)	100	45.28	54.32	44.53	35.15	24.47
Hazardous Air Pollutants <sup>4</sup> (HAPs)	10/25	5.71	5.71	5.45	5.26	2.75

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

- ◆ The Particulate Matter was calculated using the controls on the dust collectors and spray booths. No controls were considered for the space heaters.

<sup>2</sup>The differences in actuals for PM<sub>10</sub> in 2014 - 2015 from 2011 - 2013 as reported are due to the control device. The emission units have a 99% control efficiency applied in 2014 and 2015. This control was not applied in the reported emissions in 2011, 2012 or 2013.

<sup>3,4</sup>The installation is limited by Permit Condition PW002 to:

- ◆ Less than 100 tons of VOCs from the entire installation during any consecutive 12 month period.
- ◆ Less than 10 tons of any individual HAPs from the entire installation during any consecutive 12 month period.
- ◆ Less than 25 tons of HAPs in aggregate from the entire installation during any consecutive 12 month period.

### **Permit Reference Documents**

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

- 1) Intermediate Operating Permit Application, received July 21, 2016;
- 2) 2015 Emissions Inventory Questionnaire, received April 28, 2016;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit 102016-006, Issued October 24, 2016
- 5) Construction Permit 122015-006, Issued December 10, 2015
- 6) No Construction Permit Required, Issued July 31, 2015
- 7) Construction Permit 09-03-008, Issued June 18, 2009
- 8) Construction Permit 08-10-017, Issued October 28, 2008
- 9) Construction Permit 07-02-001, Issued April 20, 2007
- 10) Construction Permit 06-05-009, Issued August 31, 2006
- 11) Construction Permit 05-08-005, Issued October 4, 2005
- 12) Construction Permit 98-08-055A, Issued June 23, 2005
- 13) Construction Permit 04-01-001, Issued February 11, 2004
- 14) Construction Permit 03-06-010, Issued September 18, 2003
- 15) Construction Permit 02-02-010, Issued October 7, 2002
- 16) Construction Permit 01-05-012, Issued December 9, 2001
- 17) Construction Permit 01-01-052, Issued March 30, 2001
- 18) Construction Permit 00-07-036, Issued October 8, 2000
- 19) Construction Permit 99-07-052, Issued December 24, 1999
- 20) Construction Permit 99-07-051S, Issued October 30, 1999
- 21) Construction Permit 99-07-049S, Issued October 1, 1999
- 22) Construction Permit 98-08-054, Issued June 9, 1999
- 23) Construction Permit 98-08-055, Issued December 16, 1998
- 24) Construction Permit 98-01-005, Issued April 24, 1998
- 25) Construction Permit 95-01-014R, Issued February 27, 1995
- 26) Construction Permit 1993-00-003, Issued June 18, 1993

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

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

None

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

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

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*; and  
10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*



The combustion units at this facility are exempt from these rules under 10 CSR 10-6.260(1)(A)2 and 10 CSR 10-6.261(1)(A) as they exclusively combust pipeline grade natural gas. On November 30, 2015 this regulation was rescinded and replaced with 10 CSR 10-6.261, Control of Sulfur Dioxide Emissions. However, 6.260 is still contained in the State Implementation Plan (SIP) and therefore must be evaluated for applicability until it is removed from the SIP.

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

The space heaters at this facility are exempt from this rule under 10 CSR 10-6.405(1)(C) as they exclusively combust pipeline grade natural gas.

### **Construction Permit History**

Construction Permit 1993-00-003, Issued June 18, 1993

- ◆ This construction permit is for the installation of a binks spray booth. This was removed and replaced by the paint spray booth approved in Construction Permit 95-01-014R, Issued February 27, 1995.

Construction Permit 95-01-014R, Issued February 27, 1995

- ◆ This construction permit is for the installation of a paint spray booth.
  - ◆ Special Conditions are included in Permit Condition 002.
  - ◆ The requirement that written approval is needed from the Division if a 500 gallon limit was exceeded was removed from the special condition as the limit is already established by limiting use to 200 gallons/year of paint, coatings, primer, enamels and not more than 300 gallons of cleaning solvent, and the Division referred to in the Construction Permit no longer exists. In order to exceed this limit a request would need to be submitted to the Missouri Department of Natural Resources' in order to modify the construction permit.

Construction Permit 98-01-005, Issued April 24, 1998

- ◆ This construction permit is for the installation of five shading air mixers.
  - ◆ Special Conditions are included in Permit Condition 003.

Construction Permit 98-08-055, Issued December 16, 1998

Construction Permit 98-08-055A, Issued June 23, 2005

- ◆ This construction permit is for the installation of three above ground storage tanks with five separate compartments in each tank.
  - ◆ Special Conditions are included in Permit Condition 001.

Construction Permit 98-08-054, Issued June 9, 1999

- ◆ This construction permit is for the installation of paint mixers for the small batch area. These mixers are no longer in use and are not incorporated in this operating permit.

Construction Permit 99-07-049S, Issued October 1, 1999

- ◆ This construction permit is for the installation of a 2,000 gallon mixing tank, Tank 9
  - ◆ Special Conditions are included in Permit Condition 004.

Construction Permit 99-07-051S, Issued October 30, 1999

- ◆ This construction permit is for the installation of a sand mill.

Construction Permit 99-07-052, Issued December 24, 1999

- ◆ This construction permit is for the installation of Automotive/Industrial Paint Spray Booth
  - ◆ Special Conditions are included in Permit Condition 005.

Construction Permit 00-07-036, Issued October 8, 2000

- ◆ This construction permit is for the installation of Premier Submersible Mill
  - ◆ Special Conditions are included in Permit Condition 006.

Construction Permit 01-01-052, Issued March 30, 2001

- ◆ This construction permit is for the installation of three submersible mills.
  - ◆ Special Conditions are included in Permit Condition 007.

Construction Permit 01-05-012, Issued December 9, 2001

- ◆ This construction permit is for a modification to the Fairing Compound Mixer.

Construction Permit 02-02-010, Issued October 7, 2002

- ◆ This construction permit is for a modification to the Hockmeyer paddle mixer in E-Building.
  - ◆ Special Conditions are included in Permit Condition 008.

Construction Permit 03-06-010, Issued September 18, 2003

- ◆ This construction permit is for the installation of Hockmeyer Paddle Mixer D.
  - ◆ Special Conditions are included in Permit Condition 009.

Construction Permit 04-01-001, Issued February 11, 2004

- ◆ This construction permit is for the installation of a lab paint booth.
  - ◆ Special Conditions are included in Permit Condition 010.

Construction Permit 05-08-005, Issued October 4, 2005

- ◆ This construction permit is for the installation of a Hockmeyer CMX-100 Tank Washer
  - ◆ Special Conditions are included in Permit Condition 013.

Construction Permit 06-05-009, Issued August 31, 2006

- ◆ This construction permit is for the installation of Automotive/Industrial Paint Spray Booth
  - ◆ Special Conditions are included in Permit Condition 014.

Construction Permit 07-02-001, Issued April 20, 2007

- ◆ This construction permit is for the installation of five production mixers.
  - ◆ Special Conditions are included in Permit Condition 016 and 017.

Construction Permit 08-10-017, Issued October 28, 2008

- ◆ This construction permit is an update in recordkeeping requirements for CP 07-02-001.

Construction Permit 09-03-008, Issued June 18, 2009

- ◆ This construction permit is for the installation of a new container and drum washing operation. This process is no longer utilized and has not been included in this operating permit.

No Construction Permit Required, Issued July 31, 2015

- ◆ This is for the installation of a solvent holding tank.

Construction Permit 122015-006, Issued December 10, 2015

- ◆ This construction permit is for the installation of a paint mixer and filler.
  - ◆ Special Conditions are included in Permit Condition PW002.

Construction Permit 102016-006, Issued October 24, 2016

- ◆ This construction permit is for the installation of five new mixers, a horizontal mill and a basket mill.
  - ◆ Special Conditions are included in Permit Condition PW002.

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

None

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

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The cleaning solvents covered by the MACT standard are solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The installation operates cold cleaners that use non halogenated solvent as the cleaning solvent. Therefore, the installation is not subject to 40 CFR Part 63, Subpart T.

40 CFR Part 63, Subpart HHHHHH - *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

U.S. Paint is a coating manufacturing facility that makes paint for various different substrates and uses. Some of U.S. Paint's customers may apply the coatings to metal parts and/or to plastic parts. During the development (Research and Development activities (R&D)) of coatings, U.S. Paint may paint 4x6 inch metal and/or plastic panels and conduct various tests on the panels. In addition during the production process, U.S. Paint's Quality Control (QC) lab may spray metal and/or plastic 4x6 inch panels to verify that the product manufactured meets the required specifications. These activities are exempt from this rule per §63.11169 (d) (4) and (5).

40 CFR Part 63, Subpart CCCCCC - *National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing*

This rule is applicable and has been applied in the permit. This is a facility that performs paints and allied products manufacturing that is an area source of hazardous air pollutant (HAP) emissions and processes, uses, or generates materials containing HAP,

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

None

### **Greenhouse Gas Emissions**

There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO<sub>2</sub>e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub>e emissions were not included within this permit.

**Other Regulatory Determinations**

- 1) 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is applicable, as the potential emissions of the facility are about 0.16 tpy, there is very little chance of exceeding the opacity limits in the rule as long as the control devices are utilized on the dust collectors and spray booths. Therefore there is no recordkeeping or reporting required for this rule.
- 2) 10 CSR 10-6.400, *Restriction of Emission Of Particulate Matter From Industrial Processes*
  - a) R&D, Small Batch, and QC lab coating operations:  
 According to paragraph (1)(B)14 of this rule, coating operations equipped with a control system designed to control at least 95% of the particulate overspray are exempt from the requirements of this rule. All the R&D, Small Batch, and QC lab coating operations are equipped with dry filters with particulate matter control efficiencies greater than 95 percent. Therefore, these units are not subject to this rule..
  - b) According to 10 CSR 10-6.400(1)(B)7., fugitive sources are not subject to this rule. The following fugitive sources and the units listed in the “Emission Units Without Limitations” section are not subject to this rule.

Emission Unit #	Description of Emission Unit
EP-2A	Five (5) Shading Air Mixers (D/ PM16, D/PM17, D/PM18, D/PM19, and D/PM20)
EP-2B	2000 Gallon Mixing Tank (Tank 9). (D/TKM#9)
EP-2C	Premier Submersible Mill
EP-2D	Three (3) Premier Submersible Mills
EP-2E	Hockmeyer Paddle Mixer
EP-2F	Paddle Mixer
EP-2H	Isocyanate Mixers
EP-2I	PSM700 Submersible Mill
EP-2J	Five (5) Bank of Mixers (D/PM11, D/PM12, D/PM13, D/PM14, D/PM15)
EP-2K	Horizontal Mill in Small Batch

- c) The dust collectors (EP-2G) in the mixing area which are used to capture excess pigment while dumping pigment are the only activities that are subject to this rule.

For the purpose of determining the maximum allowable particulate matter emissions from EP-2G, the following calculations were performed.

Maximum hourly design rate = 2.5 lbs/hr  
 Exhaust stack temperature = 68°F  
 Exhaust flow rate = 2,500 ft<sup>3</sup>/min  
 $SCFM = [2,500 \text{ ft}^3/\text{min} \times 528^\circ\text{R}] \div [(68^\circ\text{F} + 468)^\circ\text{R}] = 2,500 \text{ ft}^3/\text{min}$   
 $PM \text{ concentration} = [2.5 \text{ lbs/hr} \times 7,000 \text{ gr/lb}] \div [2,500 \text{ ft}^3/\text{min} \times 60 \text{ min/hr}] = 0.11 \text{ gr/scf}$

It is highly unlikely that the 0.3 grain per standard cubic foot limit of this rule will be exceeded with the control device operating properly. As the calculations shows above, the values are well

below the allowable emission rate. Therefore, the monitoring and recordkeeping will include periodic monitoring of the control device.

3) 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*

As stated above U.S. Paint is a coating manufacturing facility. All the coating operations at the facility are for research/development and for quality control purposes. These activities are exempt from this rule per paragraph (1)(D)4 of 10 CSR 10-5.330.

4) 10-5.540, *Control of Emissions From Batch Process Operations*

This rule is applicable to all batch process operations that have the potential to emit equal to or greater than 100 tons per year of VOCs at sources identified by any of the following four (4)-digit standard industrial classification (SIC) codes, as defined in the 1987 edition of the Federal Standard Industrial Classification Manual: SIC 2821, 2833, 2834, 2861, 2865, 2869, and 2879.

This rule is SIC code specific. US Paint's SIC code is 2851. It is not either one of the SIC codes

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

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

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

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

## Response to Public Comments

On February 9, 2017, Mr. Mark A. Smith, Chief of the Air Permitting and Compliance Branch from EPA Region 7, submitted ten comments. The comments are addressed in the order in which they appear within the letter(s).

**Comment #1:** It is the customary practice of MDNR to attach examples of the compliance verification records to draft operating permits for public review and comment. However, there are no record keeping examples for:

- Tracking production rates in Permit Condition PW001;
- Recording inspections of wet and dry particulate matter (PM) control devices and routine visual determinations of emissions in Permit Condition PW003;
- Tracking throughput of paint and cleaning solvent; the PM<sub>10</sub> emissions; and visual inspection and/or maintenance of the control device in Permit Condition 005;
- Tracking the material throughput, amount of finished product; throughput of cleaning solution, and emissions of volatile organic compounds (VOC) hazardous air pollutants (HAP) and methyl ethyl ketone (MEK) in Permit Condition 006 and in Permit Condition 007;
- Tracking the daily throughput of the mixers in Permit Condition 016; and
- Tracking the number of batches produced and HAP content of each batch in Permit Condition 017.

EPA strongly recommends MDNR include examples of the records U.S. Paint uses to track these specific requirements.

**Response to Comment:** Sample recordkeeping attachments for Permit Condition PW001, PW003, 005, 006, 007, 016 and 017 have been included. The referenced sheets are attachments, L and M to be used for production rates/throughput tracking, attachments F, G, H, I and N are used for visual inspection, particulate matter tracking and inspections, maintenance and repair. Attachments, A, B, C1 and C2 are used for tracking VOCs and HAPs. For tracking the number of batches produced and HAP content of each batch, the facility has their own electronic system being used for tracking this requirement.

**Comment #2:** Permit Condition 001 incorporates the applicable conditions from City of St. Louis Construction Permits 98-08-055 and 98-08-055A, issued August 24, 1998 and April 29, 2005, respectively, authorizing the installation of fifteen (15) storage tanks. City of St Louis Construction Permit 98-08-055 requires U. S. Paint to limit throughputs of each compartment and the total throughput of all tanks combined, on an annual basis. Construction Permit 98-08-055 also requires U. S. Paint to obtain written approval prior to any change in materials being stored. However, Permit Condition 001 does not include this construction permit. 10 CSR 10-6.065(5)(C)1 requires that all requirements applicable to the installation at the time of operating permit issuance shall be included. Therefore, EPA strongly recommends MDNR include all applicable conditions from City of St. Louis Construction Permits 98-08-055 and 98-08-055A.

**Response to Comment:** This condition was not included due to an amendment letter issued to U.S. Paint on July 23, 2007 from the City of St. Louis Department of Health. In this letter it

states that “This program has determined that U.S. Paint Corporation is no longer required to obtain approval before changing the solvents in the above ground storage tanks based upon review of 10 CSR 10-6.061, Construction Permit Exemptions, section (3)(B)2.”

**Comment #3:** Permit Condition 001 requires the permittee to utilize Attachment C, or an equivalent MDNR approved form, to demonstrate compliance with the one (1.0) ton of volatile organic compound (VOC) in any consecutive 12-month period emission limit. Permit Condition 001 involves the storage of materials in above ground storage tanks (AST) and VOC emissions from AST's are comprised of working and breathing losses. Attachment C does not appear to reference tank emissions and therefore, EPA strongly recommends U. S. Paint implement a tank loss tracking mechanism and that MDNR attach U. S. Paint's methodology and compliance verification record keeping example to the operating permit.

**Response to Comment:** Corrected. Added Attachment C2 to track VOC emissions for the tanks.

**Comment #4:** Plant wide Permit Condition PW002 establishes a synthetic minor limit of 100.0 tons of volatile organic compounds (VOC) in any consecutive 12-month period; a 25 tons of total hazardous air pollutants (HAP) in any consecutive 12-month period; and 10 tons of any single HAP in any consecutive 12-month period from the entire installation. By definition, the entire installation includes all source operations, including activities that result in fugitive emissions that belong to the same industrial grouping located on one or more contiguous or adjacent properties and are under common control. Permit Condition PW002 also requires the permittee to maintain accurate records of VOC and HAP emissions from the installation using Attachments A, B, and C or an MDNR approved equivalents. However, this draft operating permit includes ten (10) other specific permit conditions with VOC and/or HAP emission limits. Permit Conditions 001,004,007,008,009,010,013,014,016 and 017 have combined limits of 95.04 tons of VOC in any consecutive 12-month period and 26.04 tons of combined HAPs in any consecutive 12-month period. The total combined HAP limit for these 10 specific permit conditions is greater than the allowable HAP emission limit for the entire installation. EPA strongly recommends that U. S. Paint and MDNR combine the VOC and HAP limitations, along with their associated monitoring and record keeping, into the single plant wide permit condition and revise Attachments A, B, and C such that they provide compliance verification with the specific limits of Permit Conditions 001, 004, 007, 008, 009, 010, 013, 014, 016 and 017.

**Response to Comment:** The permit conditions in 001, 004, 007, 008, 009, 010, 013, 014, 016 and 017 were established for construction permitting purposes as the construction permits were issued. While the facility does track each individual limit, the overall limit in Permit Condition PW002 establishes the HAP and VOC emissions limits for the overall facility and also includes other units not specified in those conditions, the facility must still meet the overall limit for HAPs and VOCs, regardless of what limits were established at the time the construction permits were issued. Sample tracking sheets have been included in the permit, but the facility uses their own electronic system for tracking each individual limit as well as the overall limit.

**Comment #5:** Permit Condition 004 incorporates applicable conditions from City of St Louis Construction Permit 99-07-049S; Permit Condition 006 incorporates applicable conditions from City of St. Louis Construction Permit 00-07-036; Permit Condition 008 incorporates applicable conditions from City of St. Louis Construction Permit 02-02-010; and Permit Condition 009

incorporates applicable conditions from City of St. Louis Construction Permits 01-05-012 and 03-06-010. All of these referenced City of St. Louis construction permits require U. S. Paint to report spills of 20 gallons or greater within a reasonable time not to exceed 5:00 p.m. the following business day and/or to obtain approval prior to the use of any material not included in the construction permit application. As stated above, 10 CSR 106.065(5)(C)1 requires that all requirements applicable to the installation at the time of operating permit issuance shall be included. Therefore, EPA strongly recommends MDNR include all applicable requirements from City of St. Louis Construction Permits 99-07-049S; 00-07-036; 02-02-010; 01-05012; and 03-06-010.

**Response to Comment:** Corrected.

**Comment #6:** Permit Condition 013 incorporates applicable conditions from City of St. Louis Construction Permit 05-08-005, issued October 4, 2005. This construction permit includes a limitation where by the permittee shall not emit more than 10 tons of any single HAP in any consecutive 12-month period. However, Permit Condition 013 does not include this single HAP limit; although, Permit Condition 013 does require the permittee to keep monthly and consecutive 12-month single HAP records. As stated above, 10 CSR 10-6.065(5)(C)1 requires that all requirements applicable to the installation at the time of operating permit issuance shall be included. Therefore, EPA strongly recommends MDNR include all applicable requirements from City of St. Louis Construction Permit 05-08-005 in Permit Condition 013.

**Response to Comment:** This limitation is included in the plant wide HAP limit established in PW002. To reduce repetition it was not repeated in the Emission Unit Specific Permit Condition 013.

**Comment #7:** Permit Condition 015 incorporates applicable conditions from City of St. Louis Construction Permit 06-05-009, issued August 31, 2006. Permit Condition 015 references emission unit EP-19A; "Safety Kleen Parts Washer." However, City of St. Louis Construction Permit 06-05-009 authorized U.S. Paint to install a new submersible mill to be used in the paint manufacturing process. The requirements included in Permit Condition 015 are not found in City of St. Louis Construction Permit 06-05-009 and therefore, EPA strongly recommends MDNR resolve this apparent discrepancy

**Response to Comment:** Corrected.

**Comment #8:** City of St. Louis Construction Permit 06-05-009 listed in the Construction Permit History in the Statement of Basis, of this operating permit, indicates City of St. Louis Construction Permit 0605-009 is for the installation of Automotive / Industrial Paint Spray Booth and the applicable special conditions are included in Permit Condition 014 and 015. Permit Condition 014 references emission unit EP-2I; a submersible mill, and Permit Condition 015 references emission unit EP-19A; a Safety Kleen Parts Washer. EPA recommends MDNR clarify the cross references between Permit Condition 014 and 015 and the construction permit history in the Statement of Basis

**Response to Comment:** Corrected.

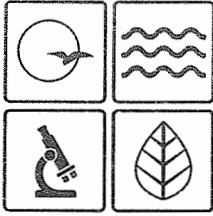


**Comment #9:** Permit Condition 016 and Permit Condition 017 incorporate applicable conditions from City of St. Louis Construction Permit 07-02-001, issued April 20, 2007. However, City of St. Louis Construction Permit 08-10-017, issued October 30, 2008 amends City of St. Louis Construction Permit 07-02-001; yet neither Permit Condition 016 nor Permit Condition 017 reference City of St. Louis Construction Permit 08-10-017. EPA recommends MDNR update the references to Permit Condition 016 and Permit Condition 017 and verify that all applicable conditions from both construction permits are included as requirements in the appropriate permit condition.

**Response to Comment:** Corrected.

**Comment #10:** City of St. Louis Construction Permit 93-00-003, issued June 18, 1993 authorized the installation of Binks Spray Booth; and City of St. Louis Construction Permit 98-08-054, issued August 19, 1998 authorized the installation of five (5) air mixers for the small batch area. Both of these construction permits appear to have applicable conditions, yet there are no permit conditions related to either of the construction permits. As previously stated above, 10 CSR 10-6.065(5)(C)1 requires that all requirements applicable to the installation at the time of operating permit issuance shall be included. Therefore, EPA strongly recommends MDNR include all applicable conditions from City of St. Louis Construction Permit 93-00-003 and City of St. Louis Construction Permit 98-08-054 in permit conditions in this operating permit.

**Response to Comment:** Construction Permit 98-08-054, Issued August 19, 1998 is for a set of five small batch mixers. These mixers are no longer in use. The paint spray booth approved in Construction Permit 93-00-003, Issued June 18, 1993, was removed and replaced by the paint spray booth approved in Construction Permit 95-01-014R, Issued February 27, 1995. The statement of basis has been updated.



Missouri Department of

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# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 22 2017

Mr. John Duchardt  
U. S. Paint Corporation  
831 South 21st Street  
St. Louis, MO 63103

Re: Intermediate Operating Permit Renewal  
Installation ID: 510-0097, Permit Number: OP2017-026

Dear Mr. Duchardt:

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

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/kbj

Enclosures

c: PAMS File: 2016-07-039



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