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: OP2018-009
Expiration Date: FEB 07 2023
Installation ID: 175-0061
Project Number: 2016-11-043

Installation Name and Address
Wilson Trailer Sales, Inc.
1600 Route DD
Moberly, MO 65270
Randolph County

Parent Company's Name and Address
Wilson Trailer Company
4400 South Lewis Blvd
Sioux City, IA 51106

Installation Description:
Wilson Trailer Sales, Inc. operates a truck trailer manufacturing facility. Operations include metal cutting, welding, metal parts washing prior to painting, spray painting, and baking of the coating. Natural gas fired heaters are used for building heat, and furnaces. The facility is a synthetic minor source of volatile organic compounds and hazardous air pollutants and is subject to 40 CFR Part 63 Subpart HHHHHH.

Prepared by:
Bern Johnson
Operating Permit Unit

Director or Designee
Department of Natural Resources
FEB 07 2018
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.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01</td>
<td>Spray booth used for painting finished trailers</td>
</tr>
<tr>
<td>EU03</td>
<td>Spray gun cleaner</td>
</tr>
</tbody>
</table>

**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.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01-PC</td>
<td>Parts Cleaning</td>
</tr>
<tr>
<td>EUF01-W</td>
<td>Facility Welding</td>
</tr>
<tr>
<td>EU-20</td>
<td>Plasma Cutter</td>
</tr>
<tr>
<td>EU-21</td>
<td>Jet Wheel Abrasive Blaster</td>
</tr>
<tr>
<td>natural gas combustion</td>
<td>2 Paint Booth Furnaces, 3.81 MMBtu/hr each</td>
</tr>
<tr>
<td></td>
<td>2 Wash Booth Furnaces 2.25 MMBtu/hr each</td>
</tr>
<tr>
<td></td>
<td>Cure Booth Furnace, 4.51 MMBtu/hr</td>
</tr>
<tr>
<td></td>
<td>Lunch Room Furnace, 0.20 MMBtu/hr</td>
</tr>
<tr>
<td></td>
<td>Training Room Furnace, 0.04 MMBtu/hr</td>
</tr>
<tr>
<td></td>
<td>Conference Room Furnace, 0.04 MMBtu/hr</td>
</tr>
<tr>
<td></td>
<td>Main Office Furnace, 0.15 MMBtu/hr</td>
</tr>
<tr>
<td></td>
<td>2 Weather Rite Furnace, 3.46 MMBtu/hr each</td>
</tr>
<tr>
<td></td>
<td>3 CoRay Vac Furnaces, 0.10 MMBtu/hr each</td>
</tr>
<tr>
<td></td>
<td>Wash Booth Furnace, 0.0005 MMBtu/hr</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

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

The following general conditions apply to all plantwide and emission unit specific conditions in this document, unless otherwise stated.

**Monitoring:**
The permittee shall calibrate, maintain, and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer’s recommendations, or maintenance and operational history of similar units. All calibrations, maintenance, and operations shall occur according to good engineering practices. All manufacturing specifications and operational/maintenance histories shall be kept on site.

**Recordkeeping:**
1) The permittee shall record all required record keeping in an appropriate format.
2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
3) The permittee shall keep a copy of this operating permit, copies of all issued construction permits, and copies of all Safety Data Sheets (SDS) on site.
4) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

**Reporting:**
1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of any permit condition in the annual compliance certification.
3) All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

<table>
<thead>
<tr>
<th>PERMIT CONDITION PW 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A)-Voluntary Limitation(s)</td>
</tr>
</tbody>
</table>

**Emission Limitation**
1) The permittee shall discharge into the atmosphere from the entire installation less than 100.0 tons of volatile organic compounds (VOC) during any rolling 12-month period.
2) The permittee shall emit less than 10.0 tons of any individual hazardous air pollutant (HAP) and less than 25.0 tons of any combination of HAPs in any rolling twelve month period.

**Monitoring/Recordkeeping**

The permittee shall maintain an accurate record of VOC and HAP emissions. The permittee uses custom spreadsheets for emissions tracking (see Attachment B).
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.

PERMIT CONDITION 1

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU01</td>
<td>Spray booth with low-temperature fabric filters</td>
</tr>
<tr>
<td>EU03</td>
<td>Spray Gun Cleaner</td>
</tr>
</tbody>
</table>

General Compliance Requirements

1) All painters must be certified to have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 6) below. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements. [§63.11173(e)(1)]

2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following requirements. [§63.11173(e)(2)]
   a) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see §63.14 of Subpart A). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications. [§63.11173(e)(2)(i)]
   b) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.[§63.11173(e)(2)(iii)]
3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see §63.14 of Subpart A. The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).[§63.11173(e)(3)]

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

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

6) The permittee shall ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by 1) above. The training program must include, at a minimum, the following: [§63.11173(f)]

a) A list of all current personnel by name and job description who are required to be trained; [§63.11173(f)(1)]

b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training: [§63.11173(f)(2)]

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

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

iii) Routine spray booth and filter maintenance, including filter selection and installation. [§63.11173(f)(2)(iii)]

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

c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. The permittee who can show by documentation or certification that a painter's work
experience and/or training has resulted in training equivalent to the training required in 6)b) above are not required to provide the initial training required by that paragraph to these painters. [§63.11173(f)(3)]

7) As required by 1) above, all new and existing personnel, including contract personnel, who spray apply surface coatings, shall be trained by the dates specified in a) below. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. [§63.11173(g)]

   a) All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 6)b) above satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. [§63.11173(g)(2)]

   b) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years. [§63.11173(g)(3)]

Recordkeeping
1) The permittee shall keep certification that each painter has completed the training specified in General Compliance Requirements 6) with the date the initial training and the most recent refresher training was completed. [§63.11177(a)]

2) The permittee shall keep documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in General Compliance Requirements 1). [§63.11177(b)]

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

4) The permittee shall keep copies of any notification or report submitted. [§63.11177(d)]

5) The permittee shall keep records of any deviation from General Compliance Requirements. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. [§63.11177(g)]

6) The permittee shall keep records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report. [§63.11177(h)]

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

Reporting
1) Annual Notification of Changes Report. The permittee shall submit a report in each calendar year in which information previously submitted in either the initial notification or a previous annual notification has changed. Deviations from the relevant requirements General Compliance Requirements on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information: [§63.11176(a)]

   a) Your company’s name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. [§63.11176(a)(1)]
b) The name, title, address, telephone, e-mail address (if available) and signature of the permittee, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. [§63.11176(a)(2)]

2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification 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.

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 is a State Only permit requirement.*

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

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

**Emission Limitation:**

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.
**Monitoring:**
The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

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

**Recordkeeping:**
The permittee shall document all readings, noting the following:
1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether equipment malfunctions contributed to an exceedance.
3) Any violations and any corrective actions undertaken to correct the violation.

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**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.

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**10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**
The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.
10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.

d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).

e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.

f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

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

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR Part 82.
V. General Permit Requirements
The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

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

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

**10 CSR 10-6.065, §(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.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

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

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

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(5)(C)5 Off-Permit Changes</th>
</tr>
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</table>
| 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.

<table>
<thead>
<tr>
<th>10 CSR 10-6.020(2)(R)34 Responsible Official</th>
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<tbody>
<tr>
<td>The application utilized in the preparation of this permit was signed by David Breid, General Supervisor. 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.</td>
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This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MoDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # or CVM # ____________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
</tr>
<tr>
<td></td>
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</table>
ATTACHMENT B
Custom Tracking Worksheets

Emissions tracking forms, whether paper or electronic, must contain at minimum the following:

**Plantwide PW 1 emission limit:**
- Permit Condition PW 1 of this operating permit limits the emissions of volatile organic compounds (VOC’s) to no more than 100 tons of VOC’s in any rolling 12-month period; in addition, this permit condition limits the emissions of hazardous air pollutants (HAP’s) emitted by this installation to a rate not to exceed 10 tons of any individual HAP and 25 tons of all HAP’s combined in any rolling 12-month period. When calculating the total emissions, be sure to include emissions from all emissions sources at this installation, listed on page two of this operating permit as Emission Units with Limitations and Emission Units without Specific Limitations. Emissions may be grouped by type; for example, all natural gas combustion sources may be grouped and tracked together by fuel usage.
- Record the monthly product usage for spray booth EU01
  - The VOC and HAP emissions factors are calculated by multiplying component density and the VOC and HAP percentages (using highest value if range is given in Safety Data Sheet (SDS)).
  - Include the VOC from the parts cleaner (EU01-PC)
- Record the VOC used in the gun cleaner (EU03). Purchase receipts and SDS are sufficient.
  - The emission factor is the VOC and HAP density (using the highest value if a range is given in SDS)
- Record the monthly natural gas usage. Purchase receipts are sufficient.
  - The emission factor to be used is 5.3 lbs VOC/MMSCF and 1.89 lbs HAPs/MMSCF (WebFIRE SCC 10500106)
- Calculate monthly VOC and HAP emissions by multiplying the throughput and emission factor for each type.
- Calculate rolling 12-month VOC/HAPs emissions by adding current month’s emissions to previous eleven months emissions
- Compare emission total to limit and indicate whether or not compliance was met
- Include SSM emissions, if any, in each monthly total as reported to the Air Pollution Control Program in accordance with 10 CSR 10-6.050.
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
Wilson Trailer Sales, Inc. operates a truck trailer manufacturing facility. Truck trailers are manufactured from metal sheets and bars by washing, cutting, and welding. The finished trailers are painted in a spray booth, followed by baking of the coating in natural gas heated furnaces. Operations include metal cutting, welding, metal parts washing prior to painting, spray painting, and baking of the coating. Cleaning solvent is used to clean the spray guns. Natural gas fired heaters are used for building heat, and furnaces. The installation has 24 steel welding units and 26 aluminum welding units. The welding units are used in the manufacturing of truck trailers. All of the welding units are located at various sites within the building. The heat generated from an electrode/rod and the point of contact with the truck trailer produces the PM (all PM is assumed to be less than 10 microns) emitted from the welding process. There are no capture and control systems for the welding units.

The facility is subject to 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. It is not a named source and fugitive emissions are not counted for potential-to-emit.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)(^1)</th>
<th>HAP</th>
<th>Potential to Emit (tons/yr)(^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>8.76</td>
<td>ethylbenzene</td>
<td>1.63</td>
</tr>
<tr>
<td>NO(_x)</td>
<td>10.43</td>
<td>xylene</td>
<td>6.35</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>25.14</td>
<td>toluene</td>
<td>24.43</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>23.86</td>
<td>chromium</td>
<td>0.004</td>
</tr>
<tr>
<td>SO(_x)</td>
<td>0.06</td>
<td>manganese</td>
<td>1.33</td>
</tr>
<tr>
<td>VOC</td>
<td>114.58</td>
<td>nickel</td>
<td>0.004</td>
</tr>
<tr>
<td></td>
<td></td>
<td>total HAP</td>
<td>33.94</td>
</tr>
</tbody>
</table>

\(^1\)Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation, except for EP-01 Paint Booth, which was evaluated at 743.5 hours due to bottleneck on production.
Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$_{10}$</td>
<td>0.08</td>
<td>0.18</td>
<td>0.21</td>
<td>0.27</td>
<td>0.26</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>0.08</td>
<td>0.18</td>
<td>0.21</td>
<td>0.27</td>
<td>0.26</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>VOC</td>
<td>2.12</td>
<td>13.1</td>
<td>9.75</td>
<td>18.92</td>
<td>12.46</td>
</tr>
<tr>
<td>CO</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>HAPs</td>
<td>0.18</td>
<td>0.97</td>
<td>0.58</td>
<td>2.63</td>
<td>2.15</td>
</tr>
</tbody>
</table>

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

1) Intermediate Operating Permit Application, received November 18, 2016;
2) 2016 Emissions Inventory Questionnaire, received February 23, 2017;
3) WebFIRE; and

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 10-6.220 *Restriction of Emission of Visible Air Contaminants* – due to controls required by Subpart HHHHHHH, visible emissions are not expected from the spray booth.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* – all combustion equipment at the installation uses pipeline grade natural gas and is exempt from this rule.
10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – all combustion equipment at the installation uses pipeline grade natural gas and is exempt from this rule.

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating* – this rule does not apply because all of the furnaces use pipeline grade natural gas exclusively. [10 CSR 10-6.405(1)(E)]

**Construction Permit History**
Construction Permit #0199-022, Issued December 18, 1998 – this construction permit was issued for the flatbed trailer manufacturing plant. This permit contains no special conditions.

**New Source Performance Standards (NSPS) Applicability**
40 CFR Part 60 Subpart MM, *Standards for Performance of Automobile and Light-Duty Truck Surface Coating Operations* – the installation coats truck trailers and not automobiles or light-duty trucks as defined in the subpart, therefore this rule does not apply.

**Maximum Achievable Control Technology (MACT) Applicability**
40 CFR Part 63 Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing* – this installation uses coatings but does not manufacture them, therefore this rule does not apply.

40 CFR Part 63 Subpart IIII, *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks* – the installation coats truck trailers, but not automobiles or light-duty trucks as defined in the rule, therefore this rule does not apply.

40 CFR Part 63 Subpart T, *National Emission Standards for Halogenated Cleaning* – the installation has one parts cleaner used to clean mechanical tools at the facility. The parts cleaner uses 105 Solvent, which is not a halogenated solvent as defined in the rule, therefore this rule does not apply.

40 CFR Part 63 Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* – the installation is an area source of HAP due to Permit Condition PW1; this rule applies only to major sources. [§63.3881(b)]

40 CFR Part 63 Subpart XXXXXX—*National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* – the installation does not produce fabricated metal products as defined in Table 1 of the rule.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**
None

**Other Regulatory Determinations**
10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* – this rule does not apply to the paint booth because the installation meets the exemption in 10 CSR 10-6.400(1)(B)(14). The installation is required to install a control device with at least 95 percent control efficiency under 40 CFR Part 63 Subpart HHHHHH.
The welding units are exempt from this rule by 10 CSR 10-6.400(1)(B)16. The smallest trailer weighs 6300 lb and the maximum weight of wire (electrode) consumed in one hour is 953 lb for a total process weight of 7253 lb/hr (3.63 ton/hr). The PM$_{10}$ emission factor from FIRE (SCC 30905254) is 5.2 lb/1000 lb electrode consumed.

EUF01-W is below 60,000 lbs/hr and is calculated with the following equation:

Maximum Allowable PM Emissions \[ E = 4.10P^{0.67} \]

\[ P = \text{Process weight rate (tons/hr i.e. MHDR)} \]
\[ E = \text{Allowable emission rate limit (lb/hr)} \]

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>MHDR (per hour)</th>
<th>Allowable Emission Rate (lbs/hr)</th>
<th>Emission Factor (lbs/ton)</th>
<th>Pre-Control PTE (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EUF01-W</td>
<td>0.953</td>
<td>9.72</td>
<td>5.2</td>
<td>4.96</td>
</tr>
</tbody>
</table>

These calculations demonstrate that the welding units are always in compliance with 10 CSR 10-6.400.

EU-20 (0.10 lbs/hr) and -21 (0.21 lbs/hr) are exempt under 10 CSR 10-6.400(1)(B)12.

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

A draft of the Intermediate Operating Permit for Wilson Trailer Sales, Inc. was placed on public notice on December 1, 2017, by the Missouri Department of Natural Resources (MDNR). Five comments were received from Mr. David Breid of Wilson Trailer Sales, Inc. and one from Beth Kroes of Northeast Regional Office. The comments are addressed in the order in which they appear.

Mr. David Breid

Comment #: 1
I. Installation Equipment Listing

Emission Units without Specific Limitations:
The facility welding emission unit should be named EUF01-W instead of EUF01-W2.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EUF01-W</td>
<td>Facility Welding</td>
</tr>
</tbody>
</table>

Response to Comment:
The correction was made.

Comment #: 2

I. Plant Wide Emission Limitations Monitoring:
The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related to instruments according to manufacturer's recommendation or maintenance and operational history of similar units. All calibrations, maintans and operations shall occur according to good engineering practices. All manufacturing specification and operational/maintenance histories shall be kept onsite.

The section of the permit refers to all pollution control devices. Wilson requests that this section be changed to all significant emission units.

Response to Comment:
This is a general comment intended to remind the permittee to keep all its pollution control devices and monitors in good operating condition. This requirement does not distinguish between emission units that are considered “significant” or “insignificant” in MOEIS.

Comment #: 3

Recordkeeping:
3). The permittee shall keep a copy of this operating permit and review, copies of all issued construction permits and reviews and copies of safety data sheets on site.

The facility would like clarification as to “and review” means in the above listed requirement. It is not clear what information is being required to be maintained.
Response to Comment:
The phrase “and reviews” refers to the Response to Public Comments, which is part of the permit. Other reviews made during the permit writing process are kept in the permit file folder by MDNR and not by the facility. The phrase was removed.

Comment #: 4

III. Emission Unit Specific Emission Limitations

General Compliance Requirements.

Requirement 2b from the previous version of the draft operating permit was removed from the current revision. The removed language is below. Wilson agrees that this language should be removed, but it should be replaced by 63.11173(e)(2)(iii), which states, “Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.”

Spray booth and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if the spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to but not more than, 0.05 inches water gauge positive pressure (63.11173(e)(2)(ii))

Response to Comment:
The addition was made.

Comment #: 5

IV. Core Permit Requirements

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

Wilson Trailer Sales would like clarification on this requirement. The monitoring requirements state that "The permittee shall conduct inspections of its facilities..." and then a schedule of monitoring is laid out in conditions 1, 2 and 3. Wilson Trailer has no sources of fugitive emissions, Wilson does not believe that any monitoring is required because there are no sources to observe. We would like confirmation from the Department that this is the case.

Response to Comment:
This rule is included in Core Permit Requirements instead of Section II or III because MDNR does not expect particulate matter emissions from the facility. Monitoring is required only if it is determined that particulate matter actually moved beyond the property boundary of the facility.
Ms. Beth Kroes

Comment #: 1

No suggested edits in my preliminary review. I like that the 6H painter certification is referenced to the ‘General Compliance Requirements’ within the permit. I also like removal of the Method 22 requirement. I also like how the VOC/HAP requirements were tied into one permit condition and the flexibility given in the attachments section so the facility can use their existing spreadsheet format.

Response to Comment:
Thank you for the compliments.
FEB 07 2018

Mr. David Breid
Wilson Trailer Sales, Inc.
1600 Route DD
Moberly, MO 65270

Re: Wilson Trailer Sales, Inc., 175-0061
   Permit Number: OP2018-009

Dear Mr. Breid

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:bjj

Enclosures

c: PAMS File: 2016-11-043