

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **092010-112** Project Number: 2009-07-017

Parent Company: WinCup Higginsville

Parent Company Address: 4640 Lewis Rd, Stone Mountain, GA 30083

Installation Name: WinCup Higginsville

Installation Number: 107-0010

Installation Address: 313 East 15th Street, Higginsville, MO 64037

Location Information: Lafayette County, S6, T49N, R25W

Application for Authority to Construct was made for:  
Construction of ten new molding machines. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

SEP 29 2010

EFFECTIVE DATE

  
\_\_\_\_\_  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

WinCup Higginsville  
Lafayette County, S6, T49N, R25W

1. **Superseding Condition**  
The conditions of this permit supersede special condition 2 found in the previously issued construction permit 032000-003 issued by the Air Pollution Control Program.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2009-07-017  
Installation ID Number: 107-0010  
Permit Number:

WinCup Higginsville  
313 East 15th Street  
Higginsville, MO 64037

Complete: July 7, 2009

Parent Company:  
WinCup Higginsville  
4640 Lewis Rd  
Stone Mountain, GA 30083

Lafayette County, S6, T49N, R25W

REVIEW SUMMARY

- WinCup Higginsville has applied for authority to construct ten new molding machines.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of volatile organic compounds (VOC) are below de minimis levels.
- This installation is located in Lafayette County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.

- Emissions testing are not required for the equipment.
- A Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

WinCup is a cup manufacturer located in Higginsville, Missouri in Lafayette County. The Higginsville plant was constructed in 1976 and the majority of the equipment was installed before 1983 and is therefore exempted from the Construction Permits rule. WinCup uses expandable polystyrene to manufacture styrofoam cups. The cups are printed if required and then packaged and shipped to customers. The ink used in printing of the cups is water based and contains no VOCs or HAPs. Isopropyl alcohol is used as a cleaning solvent at a rate of six tons per year. WinCup is considered a minor source under construction permits and currently has a Part 70 operating permit (OP2006-073)

The following permits have been issued to WinCup Higginsville from the Air Pollution Control Program.

**Table 1: Permit History**

Permit Number	Description
0179-017	500 BHP boiler
032000-003	Molding machine replacement

### PROJECT DESCRIPTION

WinCup has applied for the authority to construct and operate ten new molders (EP-8). The combined maximum hourly design rate of the molders is 148 pounds of polystyrene beads per hour. According to a telephone conversation with the plant manager, the new molders will be used to create different sized products and will not de-bottleneck the plant. The plant is bottlenecked by the expander, however the application states that the new machines will increase the plant's capacity, so a permit is being issued based on the emissions associated with the new molders. Since the plant is bottlenecked by the expander, the limit on the number of molders operating at a time has been superseded.

### EMISSIONS/CONTROLS EVALUATION

Potential emissions from the molding machines and the use of isopropyl alcohol were estimated using a mass balance approach with data from Material Safety Data Sheets (MSDS) supplied by WinCup. Existing Potential Emissions were recalculated based on information provided in the application. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

**Table 2: Emissions Summary (tons per year)**

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2009 EIQ)	Potential Emissions of the Application	New Installation Potential Emissions
PM <sub>10</sub>	15.0	1.20	0.50	N/A	1.20
SO <sub>x</sub>	40.0	0.10	0.04	N/A	0.10
NO <sub>x</sub>	40.0	12.30	6.59	N/A	12.30
VOC	40.0	155.91	65.74	24.92	155.91
CO	100.0	7.40	5.54	N/A	7.40
HAPs	10.0/25.0	N/A	N/D	N/A	N/A

N/A = Not Applicable; N/D = Not Determined

### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are below de minimis levels.

### APPLICABLE REQUIREMENTS

WinCup Higginsville shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Michael Mittermeyer  
Environmental Engineer

\_\_\_\_\_  
Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 1, 2009, received July 7, 2009, designating WinCup Higginsville as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey, dated July 16, 2009.