



PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2008-050
Expiration Date: OCT 22 2013
Installation ID: 095-0191
Project Number: 2004-12-099

Installation Name and Address

Aero Transportation Products, Inc.
3300 E. Geospace Drive
Independence, MO 64056
Jackson County

Parent Company's Name and Address

L.G. Industries, Inc.
P.O. Box 1058
Independence, MO 64051-0558

Installation Description:

Aero Transportation Products, Inc. produces fiberglass components for rail cars at its installation in Independence, Missouri.

OCT 23 2008

Effective Date


Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS	4
DOCUMENTS INCORPORATED BY REFERENCE	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
Permit Condition PW001	5
10 CSR 10-6.060	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	6
Permit Condition EU0010-001 through EU0140-001	7
10 CSR 10-6.075	7
40 CFR Part 63 Subpart WWW	7
IV. CORE PERMIT REQUIREMENTS	11
V. GENERAL PERMIT REQUIREMENTS.....	17
VI. ATTACHMENTS	23
Attachment A	24
Attachment B	25

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Aero Transportation Products, Inc. produces fiberglass components for rail cars at its installation in Independence, Missouri.

An open face mold is first sprayed with a polyester gel coat and allowed to cure. Chopped strand mat and structural woven glass are impregnated with resin and conformed to the mold shape. After the laminate is applied, the entrapped air is removed from the laminate by rolling. The laminate is then allowed to cure, after which it is removed from the mold, and trimmed, and the fiberglass parts, and other parts made of aluminum are then fitted with the appropriate gasket and hardware and then shipped to customers.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2006	--	--	--	19.29	--	--	36.72
2005	--	--	--	14.30	--	--	24.40
2004	--	--	--	6.710	--	--	9.030
2003	--	--	--	5.380	--	--	10.95
2002	--	--	--	5.220	--	--	7.730

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
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Hatch Cover Lamination Manufacturing Process (HP)

EU0010	Gelcoat Process
EU0020	Gelcoat Exotherm and Cure (Infrared Oven)
EU0030	Impregnate Glass with Resin and Finish Roll
EU0040	Resin Exotherm and Cure (Infrared Oven)
EU0050	Interior Gelcoat
EU0060	Interior Gelcoat Exotherm and Cure (Infrared Oven)

Miscellaneous Parts Lamination Manufacturing Process (MP)

EU0070	Gelcoat Process
EU0080	Gelcoat Exotherm and Cure
EU0090	Apply Resin, Load Glass and Finish Roll
EU0100	Resin Exotherm and Cure
EU0110	Interior Gelcoat
EU0120	Interior Gelcoat Exotherm and Cure

Solvent Cleaning and Storage

EU0130	Solvent Wipedown Process
EU0140	Styrene Storage Tank

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Adhesives Application Processes (SP-1, SP-2)
Infrared Ovens, Propane-Fueled (HP-3, HP-5)

DOCUMENTS INCORPORATED BY REFERENCE

The following document has been incorporated by reference into this permit.

Construction Permit 092007-010

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.

Permit Condition PW001

10 CSR 10-6.060

Construction Permit Required, Construction Permit 092007-010

Emission Limitations:

The permittee shall emit less than 250 tons of volatile organic compounds (VOCs) in any consecutive twelve-month period.

Operational Limitations:

- 1) The permittee shall keep the paints, solvents and cleaning solutions in sealed containers whenever the materials are not in use.
- 2) The permittee shall provide and maintain suitable, easily read, permanent markings on all paints, solvent and cleaning solution containers used with this installation.

Monitoring/Recordkeeping:

- 1) The permittee shall calculate and record the monthly and rolling twelve-month total for VOC emissions from this installation (see Attachment A).
- 2) These records shall include Material Safety Data Sheets (MSDS) for all materials used in this installation.
- 3) All records shall be maintained onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation. Any deviations from this permit condition shall be reported in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

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.

Hatch Cover Lamination Manufacturing Process (HP)

EU0010 – EU0060

Emission Unit	EIQ Reference (2005)	Unit Description
EU0010	HP-2	Gelcoat Process
EU0020	HP-3	Gelcoat Exotherm and Cure (Infrared Oven)
EU0030	HP-4	Impregnate Glass with Resin and Finish Roll
EU0040	HP-5	Resin Exotherm and Cure (Infrared Oven)
EU0050	HP-6	Interior Gelcoat
EU0060	HP-7	Interior Gelcoat Exotherm and Cure (Infrared Oven)

Miscellaneous Parts Lamination Manufacturing Process (MP)

EU0070 – EU0120

Emission Unit	EIQ Reference (2005)	Unit Description
EU0070	MP-2	Gelcoat Process
EU0080	MP-3	Gelcoat Exotherm and Cure
EU0090	MP-4	Apply Resin, Load Glass and Finish Roll
EU0100	MP-5	Resin Exotherm and Cure
EU0110	MP-6	Interior Gelcoat
EU0120	MP-7	Interior Gelcoat Exotherm and Cure

Solvent Cleaning and Storage

EU0130 – EU0140

Emission Unit	EIQ Reference (2005)	Unit Description
EU0130	SP-3	Solvent Wipedown Process
EU0140	ST-1	Styrene Storage Tank – 7,000 gallons

Permit Condition EU0010-001 through EU0140-001

10 CSR 10-6.075

Maximum Achievable Control Technology Regulations

40 CFR Part 63 Subpart WWWW

**National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites
Production**

Emission Limitations:

For the following operations, the permittee shall meet the following organic hazardous air pollutant (HAP) emission limits: [§63.5805(b)]

- 1) Impregnator Operation (resin, mechanical application) – 88 lb/ton
- 2) Hand Finishing (resin, manual application) – 87 lb/ton
- 3) Mold Creation (tooling resin, manual application) – 157 lb/ton
- 4) Mold Creation (tooling gel coat, atomized spray) – 440 lb/ton
- 5) Gel Coat Booth (white/off-white gel coat, atomized spray) – 267 lb/ton
[40 CFR 63 Subpart WWWW, Table 3]

Work Practice Standards:

For the following operations, the permittee shall meet the following work practice standards:
[§63.5805(b)]

- 1) Cleaning operations – the permittee shall not use cleaning solvents that contain HAP, except that organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
[40 CFR 63 Subpart WWWW, Table 4] (*Exception:* Mold stripping and cleaning are specifically excluded from any requirements in 40 CFR Part 63 Subpart WWWW. [§63.5790(c)])
- 2) HAP-containing materials storage operations – the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
[40 CFR 63 Subpart WWWW, Table 4]

Method of Compliance:

(NOTE: The permittee has chosen to comply with the above emission limitations using the methods described in §63.5810(a), demonstrating that an individual resin or gel coat as applied meets the applicable emission limit in Table 3. This demonstration is done without the use of add-on controls or other emission reduction techniques. The remaining requirements described below are based upon this method of compliance. Should the permittee choose to change the method of compliance, alternative requirements from 40 CFR Part 63 Subpart WWWW would apply.)

The permittee shall demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in 40 CFR 63 Subpart WWWW, Table 3.

- 1) Calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The permittee must calculate organic HAP emissions factors for each different process

- stream by using the appropriate equations in 40 CFR 63 Subpart WWWW, Table 1, for open molding or site-specific organic HAP emissions factors discussed in §63.5796. [§63.5810(a)(1)]
- 2) If the calculated emission factor is less than or equal to the appropriate emission limit, the permittee has demonstrated that this process stream complies with the emission limit in 40 CFR 63 Subpart WWWW, Table 3. [§63.5810(a)(2)]

Monitoring/Demonstration of Compliance:

- 1) The permittee must be in compliance at all times with the work practice standards in 40 CFR 63 Subpart WWWW, Table 4, as well as the organic HAP emissions limits in 40 CFR 63 Subpart WWWW, Table 3, as applicable, that the permittee is meeting without the use of add-on controls. [§63.5835(a)]
- 2) The permittee must retain the records of resin and gel coat organic HAP content, and must include the list of these resins and gel coats and identify their application methods in the semi-annual compliance reports. If, after the permittee has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the permittee changes the application method or controls; then the permittee again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in 40 CFR 63 Subpart WWWW, Table 3, the permittee must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a twelve-month rolling average. [§63.5895(d)]
- 3) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in 40 CFR 63 Subpart WWWW, Table 3, on a twelve-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(2)]
- 4) Compliance with the work practice standards in 40 CFR 63 Subpart WWWW, Table 4, is demonstrated by performing the work practice required for the permittee's operation. [§63.5900(a)(4)]
- 5) The permittee must report each deviation from each standard in §63.5805 that applies to the facility. The deviations must be reported according to the requirements in §63.5910. [§63.5900(b)]

Recordkeeping:

- 1) The permittee shall keep a copy of each notification and report that was submitted to comply with 40 CFR Part 63 Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.5915(a)(1)]
- 2) The permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors for operations listed in 40 CFR 63 Subpart WWWW, Table 3. [§63.5915(c)]
- 3) The permittee must keep a certified statement that the facility is in compliance with the work practice requirements in 40 CFR 63 Subpart WWWW, Table 4, as applicable. [§63.5915(d)]
- 4) The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]
- 5) As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]

- 6) The permittee must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records off-site for the remaining three years. [§63.5920(c)]
- 7) The permittee may keep records in hard copy or computer readable form including, but not limited to: paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

Reporting:

- 1) The permittee must submit a semi-annual compliance report as described in 40 CFR 63 Subpart WWWW, Table 14. The compliance report must contain: [§63.5910(a)]
 - a) A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply and there were no deviations from the requirements for work practice standards in 40 CFR 63 Subpart WWWW, Table 4 that apply. [40 CFR 63 Subpart WWWW, Table 4 – 1.a.]
 - b) The information in §63.5910(d) if the facility has a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. [40 CFR 63 Subpart WWWW, Table 4 – 1.b.]
- 2) Unless the administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the date specified in 40 CFR 63 Subpart WWWW, Table 14, and according to §63.5910(b)(1) through (5). [§63.5910(b)]
 - a) Each compliance report must cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.5910(b)(3)]
 - b) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.5910(b)(4)]
 - c) The permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established for submitting semi-annual reports pursuant to §70.6 (a)(3)(iii)(A), instead of according to the dates in §63.5910(b)(1) through (4). [§63.5910(b)(5)]
- 3) The compliance report must contain the following information:
 - a) Company name and address. [§63.5910(c)(1)]
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
 - c) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
 - d) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]
- 4) For each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where the facility is not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in §63.5910(c)(1) through (3) and in §63.5910 (d)(1) and (2). [§63.5910(d)]
 - a) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]

- b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]
- 5) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in this subpart in the semi-annual monitoring report required by §70.6(a)(3)(iii)(A). If the permittee submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semi-annual monitoring report required by §70.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.5910(g)]
- 6) Where multiple compliance options are available, the permittee must state in the next compliance report if the facility has changed compliance options since the last compliance report. [§63.5910(i)]
- 7) All compliance reports and semi-annual monitoring reports shall be sent to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102.

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) 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 10-6.050 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) Best 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 list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, 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, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 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 fifteen 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. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

- 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 non-compliance 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 10-2.100 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; the type of business or activity involved; a description of the proposed equipment and operating practices; the type, quantity and composition of trade wastes and expected composition; and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Aero Transportation Products, Inc. from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous Department of Natural Resources' inspection reports.

10 CSR 10-2.070 Restriction of Emission of Odors

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 fifteen minutes apart within the period of one hour.
This requirement is not federally enforceable.

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

- 1) 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.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 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 §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §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:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §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 §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 as specified 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.

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*

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 by a permittee:
 - 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.

V. General Permit Requirements

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

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

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(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's Enforcement Section, P. O. Box 176, Jefferson City, Missouri, 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than thirty 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, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions), shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, 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(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any non-compliance 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, re-opened, re-issued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated non-compliance, 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, re-opening, re-issuing or revoking the

permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program, copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas, 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;

- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo, concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A, shall constitute an affirmative defense to an enforcement action brought for non-compliance 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 non-compliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously

emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas, 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's, Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas, 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by, or prohibited by this permit; without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Paul T. Lyon, Chairman and 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 thirty days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be re-opened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the re-opening may be stayed pending judicial review of that determination,
- 2) Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) Missouri Department of Natural Resources or EPA determines that the permit must be re-opened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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 B

The following table is a demonstration of compliance with 10 CSR 10-2.040, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*.

Emission Unit	Total Heat Input (MMBtu/hr)	Emission Factor¹ (lb/10³ gal)	MHDR (10³ gal/hr)	PTE (lb/MMBtu)	Emission Limit² (lb/MMBtu)
Infrared Ovens (propane)	0.036	0.40	0.0040	0.0444	0.6

¹ AP-42, Table 1.5-1

² From 10 CSR 10-2.040, the total heat input of all indirect heating sources is less than 10 MMBtu/hr

STATEMENT OF BASIS

Permit Reference Documents

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

1. Part 70 Operating Permit Application, received December 20, 2004;
2. 2005 Emissions Inventory Questionnaire, received April 3, 2006;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I; Stationary Point and Area Sources, Fifth Edition;

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

The infrared ovens are exclusively propane (LPG) fueled units. In accordance with 10 CSR 10-6.260(1)(A)2., combustion equipment that uses exclusively LPG is exempt from this regulation.

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

The only emission units that have the potential to emit particulate matter are the infrared ovens. However, these emission units are indirect heating units, and are not subject to this rule in accordance with 10 CSR 10-6.400(1)(B)6.

10 CSR 10-2.215, *Control of Emissions from Solvent Cleanup Operations*

This rule shall not apply to any stationary source at which cleaning solvent VOCs are emitted at less than 500 pounds per day. This facility has historically emitted much less than this threshold (2005 EIQ reported 6.83 tons VOC from solvent cleaning), and therefore, this rule does not apply to the solvent cleaning operations at this facility.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

Construction Permits 0198-010, 0198-010A, and 0889-007

All of the special conditions of these permits were superseded by Construction Permit 092007-010, that was issued on September 21, 2007.

NSPS Applicability

40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

This rule applies to tanks storing VOC liquids that have a capacity greater than or equal to 75 m³ (19,812 Gal). The styrene storage tank does not fit this definition, therefore, this rule does not apply.

MACT Applicability

40 CFR Part 63, Subpart WWWW, *Reinforced Plastic Composites Production*

The permittee has chosen to comply with the emission limitations using the methods described in §63.5810(a), demonstrating that an individual resin or gel coat as applied meets the applicable emission limit in Table 3. The facility has chosen demonstrate compliance without the use of add-on controls or other emission reduction techniques. The requirements from this subpart that are given in the permit are based upon this method of compliance. Should the permittee choose to change the method of compliance, alternative requirements from 40 CFR Part 63 Subpart WWWW would apply.

Other Regulatory Determinations

10 CSR 10-2.040, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

The infrared ovens are subject to this rule. However, Attachment B demonstrates that when using only LPG as fuel, the emission rate is much less than the emission limit. Therefore, it is highly unlikely that these emission units will exceed the limit, and no monitoring or record keeping are required.

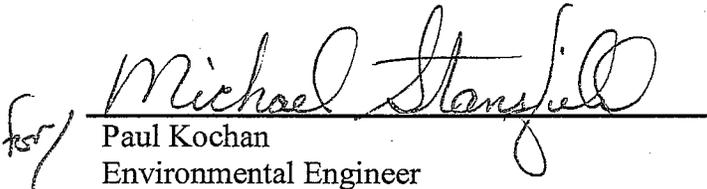
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:


Paul Kochan
Environmental Engineer