



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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NOV 22 2006

Mr. Stephen Carr, Plant Manager
Continental Manufacturing
561 N. State Drive
Mt. Vernon, MO 65712

Re: Continental Manufacturing, 109-0051
Permit Number: **OP2006-085**

Dear Mr. Carr:

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 you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS: adk

Enclosures

c: Tamara Freeman, US EPA Region VII
Southwest Regional Office
PAMS File: 2004-01-013



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 here in.

Intermediate Operating Permit Number: OP2006-085
Expiration Date: NOV 21 2011
Installation ID: 109-0051
Project Number: 2004-01-013

Installation Name and Address

Continental Manufacturing
561 N. State Drive
Mt. Vernon, MO 65712
Lawrence County

Parent Company's Name and Address

Continental Manufacturing
PO Box 31
Mt. Vernon, MO 65712

Installation Description:

Continental Manufacturing operates an existing installation in Monett, Missouri, which constructs conveyors for dry, bulk materials handling. Continental Manufacturing is moving its operation to Mt. Vernon, Missouri in Lawrence County. The installation will be limited to below major levels for HAPs and VOC.

NOV 22 2006

Effective Date

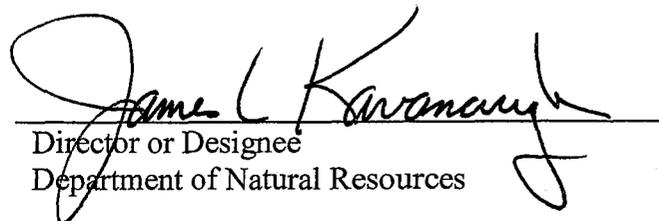

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Continental Manufacturing operates an existing installation in Monett, Missouri, which constructs conveyors for dry, bulk materials handling. Continental Manufacturing is moving its operation to Mt. Vernon, Missouri in Lawrence County. The installation will be limited to below major levels for HAPs and VOC.

Year	Reported Air Pollutant Emissions, tons per 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)
2005	-	-	-	5.54	-	-	-
2004	-	-	-	8.22	-	-	-
2003	-	-	-	3.43	-	-	-
2002	-	-	-	7.03	-	-	-
2001	-	-	-	-	-	-	-

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0010	Large Spray Booth (EP-01)
EU0020	Spray Booth – East (EP-03)
EU0030	Spray Booth – West (EP-03)
EU0040	Make-up Air Units (EP-07)
EU0050	Make-up Air Units (EP-08)
EU0060	Make-up Air Units (EP-09)
EU0070	Make-up Air Units (EP-10)

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Wash Station for Large Spray Booth (EP-05)
 Wash Station for Small Spray Booths (EP-06)
 Mixing Room (EP-12)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 102001-016

II. Plant Wide Emission Limitations

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

Permit Condition PW001

10 CSR 10-6.065

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Voluntary Operating Permit Limitation
--

Emission Limitation:

- 1) Continental Manufacturing shall not discharge into the atmosphere from this installation more than 100 tons of volatile organic compounds (VOCs) in any consecutive 12-month period. (Special Voluntary Permit Condition)

Monitoring/Recordkeeping:

Continental Manufacturing shall maintain the monthly and the sum of the most recent consecutive 12-month records of VOC emissions from the installation. Attachment A, *Monthly VOC Emissions Tracking Record*, or equivalent forms, shall be used to determine compliance with Emission Limitation 1. These records shall be maintained on-site for five (5) years and shall be made available for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

Continental Manufacturing shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month if the 12-month cumulative total (*Monitoring/Recordkeeping*) records show the source exceeded the limitations of Emission Limitation No. 1.

Permit Condition PW002

10 CSR 10-6.060

Construction Permits Required

Construction Permit Number: 102001-016, Issued on October 17, 2001

Emission Limitation:

- 1) Continental Manufacturing shall not discharge into the atmosphere from this installation more than ten (10) tons of any single hazardous air pollutant (HAP) in any consecutive 12-month period. (Special Condition #1)
- 2) Continental Manufacturing shall not discharge into the atmosphere from this installation more than twenty-five tons of aggregate HAPs in any consecutive 12-month period. (Special Condition #1)
- 3) Continental Manufacturing shall not discharge into the atmosphere from this installation more than twenty (20) pounds of lead in any consecutive 12-month period. (Special Condition #2)
- 4) Continental Manufacturing shall not discharge into the atmosphere from this installation more than forty (40) pounds of 1, 6-Hexamethylene diisocyanate (CAS No. 822-06-0) in any consecutive 12-month period. (Special Condition #3)

Monitoring/Recordkeeping:

Continental Manufacturing shall maintain the monthly and the sum of the most recent consecutive 12-month records of HAP emissions from the installation. Attachment B, *Monthly HAP Emissions Tracking Record*, or equivalent form, shall be used to determine compliance with Emission Limitation 2. These records shall be maintained on-site for five (5) years and shall be made available for inspection to the Department of Natural Resources' personnel upon request. (Special Condition #5)

Continental Manufacturing shall maintain the monthly and the sum of the most recent consecutive 12-month records of individual HAP emissions from the installation. Attachment C, *Monthly Individual HAP Tracking Worksheet*, or equivalent form, shall be used to determine compliance with Emission Limitation 1, 3, and 4. A separate worksheet should be kept for each HAP being emitted from the installation. These records shall be maintained onsite for five (5) years and shall be made available for inspection to the Department of Natural Resources' personnel upon request. (Special Condition #6)

Reporting:

Continental Manufacturing shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month if the 12-month cumulative total (*Monitoring/Recordkeeping*) records show that the source exceeded the limitations of *Emission Limitation No. 1 through 3*. (Special Condition #7)

Permit Condition PW003

10 CSR 10-6.220

Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

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

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment D or E), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment F)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment G)
- 4) Attachments D or E, F and G contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

III. Emission Unit Specific Emission Limitations

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

EU0010 – LARGE SPRAY BOOTH			
Emission Unit	Description	Manufacturer/Model #	2003 EIQ Reference #
EU0010	Large Spray Booth	Col Met	EP01

Permit Condition EU0010-001

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0010 in excess of 0.27 lb/hr.

This emission rate was calculated using the following equation:

$$E = 4.10(P)^{0.67}$$

Where:

E = rate of emission in pounds per hour and P = process weight rate in tons per hour.

- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Monitoring:

- 1) Booths equipped with filters shall not be operated without a filter in place.
- 2) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

- 1) The permittee shall maintain on the premises of the installation a copy of the Statement of Basis demonstrating compliance with this rule.
- 2) The permittee shall maintain records of the inspections of mat/panel including when they occur (See Attachment H).
- 3) Attachment H contains logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
- 5) All records shall be maintained for five years.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0020 through EU0030 – SMALL SPRAY BOOTH			
Emission Unit	Description	Manufacturer/Model #	2003 EIQ Reference #
EU0020	Small Spray Booth (east)	Col Met	EP02
EU0030	Small Spray Booth (west)	Col Met	EP03

Permit Condition (EU0020 through EU0030)-001

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0010 in excess of 0.65 lb/hr.

This emission rate was calculated using the following equation:

$$E = 4.10(P)^{0.67}$$

Where:

E = rate of emission in pounds per hour and P = process weight rate in tons per hour.

- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Monitoring:

- 1) Booths equipped with filters shall not be operated without a filter in place.
- 2) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

- 1) The permittee shall maintain on the premises of the installation a copy of the Statement of Basis demonstrating compliance with this rule.
- 2) The permittee shall maintain records of the inspections of mat/panel including when they occur (See Attachment H).
- 3) Attachment H contains logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
- 5) All records shall be maintained for five years.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0040 through EU0070 – MAKE-UP AIR UNITS			
Emission Unit	Description	Manufacturer/Model #	2003 EIQ Reference #
EU0040	Make-up Air Units	N/A	N/A
EU0050	Make-up Air Units	N/A	N/A
EU0060	Make-up Air Units	N/A	N/A
EU0070	Make-up Air Units	N/A	N/A

Permit Condition (EU0040 through EU0070)-001

10 CSR 10-6.260

Restriction of Emission of Sulfur Compounds

Emission Limitation:

- 1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation/Equipment Specifications:

The emission unit shall be limited to burning pipeline grade natural gas.

Monitoring/Recordkeeping:

Documentation supporting the fuel used is pipeline grade natural gas.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

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 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 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. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(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.
- 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 noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.030 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 Continental Manufacturing 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 DNR inspection reports.

10 CSR 10-3.090 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 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

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 10-6.080 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) An approved technician certification program pursuant to §82.161 must certify persons performing maintenance, service, repair, or disposal of appliances.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping 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, §(5)(C)1 and §(6)(C)1.B Permit Duration

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - 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, 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, recordkeeping, reporting, or any other requirements of the permit.
 - 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 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)

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(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, 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.

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

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Stephen Carr, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to

represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

This permit is accompanied by a statement setting forth the legal and factual basis for the 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 A
Monthly VOC Tracking Worksheet

Continental Manufacturing
 Lawrence County, NE 1/4, NW 1/4, S25, T28N, R27W
 Project Number: 2004-01-013, Installation ID Number: 109-0051
 Permit Number:

This sheet covers the period from _____ to _____.
 (month, year) (month, year)

Column A	Column B	Column C	Column D
Type of Paint	Amount Used (gallons)	VOC Content (lb VOC/gal paint) (from MSDS)	VOC Emissions (tons) (Note 1)
Total VOC From Painting Operation (Note 2)			
Make-up Air Units (Note 3)	Amount of Natural Gas Used (MMCF) (Note 4)	VOC Emission Factor (lb VOC/MMCF) (Note 5)	VOC Emissions (tons)
Total VOC from Combustion sources (Note 6)			
Total VOC emissions from installation for this month (Note 7)			
12-Month VOC Emission Total from Previous Month's Worksheet (Note 8)			
Monthly VOC Emissions Total From Previous Year's Worksheet (Note 9)			
Current 12-Month Total VOC Emissions (Note 10)			

- Note 1: $Column D = [(Column B) \cdot (Column C)] / 2000$
- Note 2: Sum of VOC emissions from the paint booths
- Note 3: Since all of the Make-up air units are relatively the same size and all burn natural gas, each unit does not have to be listed separately.
- Note 4: Amount of natural gas used in units of million of cubic feet.
- Note 5: Should use emission factor in most current version of AP-42 Section 1.4. Current emission factor is 5.5 lb VOC/MMCF
- Note 6: Sum of VOC emissions from combustion units.
- Note 7: Sum of VOC emissions from paint booths and combustion units.
- Note 8: Running 12-month total of VOC emissions from previous month's worksheet.
- Note 9: VOC emissions reported for this month in the last calendar year.
- Note 10: Amount reported for Note 8 minus amount reported for Note 9 plus amount reported for Note 7, not to exceed 250 tons for any consecutive 12-month period.

ATTACHMENT B
Monthly HAP Tracking Worksheet

Continental Manufacturing

Lawrence County, NE 1/4, NW 1/4, S25, T28N, R27W

Project Number: 2004-01-013, Installation ID Number: 109-0051, Permit Number:

This sheet covers the period from _____ to _____
(month, year) (month, year)

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M
Paint	Amount Used (gallons)	Density of Paint (lbs/gal)	% Xylene (Note 1 & 2)	% Ethyl benzene (Note 2)	% Toluene (Note 2)	% Methyl ethyl ketone (Note 2)	% Isopropyl benzene (Note 2)	% Lead (Note 2)	% HDI Isocyanate (CAS # 822-06-0) (Note 2)	% Other HAP (specify)	Total HAPs % (Note 3)	Total HAPs emitted for month (tons) (Note 4)
Kepon												
Carboline 8701 Part A												
Carboline 8701 Part B												
Carbothane 8815A												
Urethane Coverter 8800												
Solvent Usage												
Total Monthly HAP emissions in tons (Note 5)												
12-Month HAP emissions total from previous month's worksheet (Note 6)												
Monthly HAP emissions total from previous year's worksheet (Note 7)												
Current 12-Month total HAP emissions (Note 8)												

Note 1: % Xylene is the sum of the % m-xylene, % p-xylene, and % o-xylene

Note 2: Should be obtained from the MSDS for each type of paint used.

Note 3: Column L = Column D + Column E + Column F + Column G + Column H + Column I + Column J + Column K

Note 4: Column M = [(Column B • Column C) • (Column L/100)]/2000

Note 5: Sum of Column M

Note 6: Running 12-Month total of HAP emissions from previous month's worksheet

Note 7: HAP emissions reported for this month in the last calendar year

Note 8: Amount reported for Note 6 minus amount reported for Note 7 plus amount reported for Note 5, not to exceed 25 tons for any consecutive 12-month period.

**ATTACHMENT C
 Monthly Individual HAP Tracking Worksheet**

HAP: _____

Continental Manufacturing
 Lawrence County, NE 1/4, NW 1/4, S25, T28N, R27W
 Project Number: 2004-01-013
 Installation ID Number: 109-0051
 Permit Number:

This sheet covers the period from _____ to _____
 (month, year) (month, year)

Column A	Column B	Column C	Column D	Column E
Paint	Amount Used (gallons)	Density (lbs/gal)	Weight % of HAP (from MSDS) (Note 1)	Total HAP Emitted for the Month (Note 2)
Kepen				
Carboline 8701 Part A				
Carboline 8701 Part B				
Carbothane 8815A				
Urethane Coverter 8800				
Solvent Usage				
Total Monthly HAP emissions in tons (Note 3)				
12-Month HAP emissions total from previous month's worksheet (Note 4)				
Monthly HAP emissions total from previous year's worksheet (Note 5)				
Current 12-Month total HAP emissions (Note 6)				

Note: Please specify the specific HAP for which this worksheet is. A separate worksheet should be maintained for each HAP that is being emitted. The following is a list of HAPs that are being emitted: xylene, ethyl benzene, toluene, methyl ethyl ketone, isopropylbenzene, lead, HDI isocyanate. This list represents the HAPs that were submitted in the application. If Continental Manufacturing should change paints, it may be necessary to maintain a worksheet on any HAPs.

Note 1: Please specify HAP for which the worksheet is.

Note 2: Column E = [(Column B • Column C)•(Column D/100)]/2000

Note 3: Sum of Column E

Note 4: Running 12-Month total of HAP emissions from previous month's worksheet

Note 5: HAP emissions reported for this month in the last calendar year

Note 6: Amount reported for Note 4 minus amount reported for Note 5 plus amount reported for Note 3, not to exceed 0.01 tons lead, 0.02 tons of HDI Isocyanate (CAS # 822-060), or 10.0 tons of any other HAP for any consecutive 12-month period

ATTACHMENT F

10 CSR 10-6.220

This attachment, or an equivalent form, may be used to help meet the recordkeeping requirements of Permit Conditions PW003.

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

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

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of _____

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.

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 January 5, 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.

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.

None

Construction Permit Revisions

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

- 1) *Construction Permit 102001-016*
Construction Permit 102001-016 was issued when the installation's name was E.F. Marsh Engineering Company. The installation has since changed its name to Continental Manufacturing. All references to E.F. Marsh Engineering has been changed to Continental Manufacturing.
- 2) *Construction Permit 102001-016, Special Condition #4*
Special Condition #4 from Construction Permit 102001-016 was a limit of 250 tons of volatile organic compounds in any consecutive 12-month period. The installation indicated that they wanted to take a voluntary permit condition to be below Part 70 major source levels. The Part 70 major source levels for VOC is 100 tons per year. Since the installation indicated that they will be below Part 70 major source levels, the limit from Special Condition #4 was changed from 250 tons to 100 tons per year.

3. *Construction Permit 102001-016, Special Condition #4*

Special Condition #1 from Construction Permit 102001-016 limits the emissions of hazardous air pollutants to less than ten tons of any single hazardous air pollutant, and less than twenty-five tons of aggregate HAP's in any consecutive 12-month period. This condition was rewritten as two separate conditions, to more clearly delineate the HAP limitation. Accordingly, special conditions 2 and 3 were renumbered as special conditions 3 and 4.

New Source Performance Standards (NSPS) Applicability

None

Maximum Available Control Technology (MACT) Applicability

None

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to ACP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Other Regulatory Determinations

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

For the purpose of determining the maximum allowable particulate matter emissions from EU0010-001, the following calculations were performed:

MHDR =		34.4 lbs paint/hr	
Solids Content =		0.74 lbs solids/lb paint	
Transfer Efficiency =		85%	
Control Device Efficiency =		90%	
Capture Efficiency =		90%	
Process Weight (Tons/Hr) =		$(34.4 \text{ lbs/hr}) \div (2000 \text{ lbs/ton}) =$	0.0172 Tons/Hr
Compliance Determination			
Emission Limit =		$4.10P^{0.67} =$	0.27 lbs/hr
Uncontrolled PM emission rate =		$(34.4)(0.74)(1 - 0.85) =$	3.82 lbs/hr
Controlled PM emission rate =		$(34.4)(0.74)(1-0.85)(1-0.9)(1-0.9) =$	0.038 lbs/hr

At the maximum hourly design rate, the controlled particulate matter emission is approximately ten (10) times less than the allowable emission rate. It is highly unlikely that the allowable emission rate

will be exceeded with the control device operating properly. Therefore, the monitoring and recordkeeping will include periodic monitoring of the control device.

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

For the purpose of determining the maximum allowable particulate matter emissions from (EU0020 through EU0030)-001, the following calculations were performed:

MHDR =		127.4 lbs paint/hr	
Solids Content =		0.74 lbs solids/lb paint	
Transfer Efficiency =		70%	
Control Device Efficiency =		90%	
Capture Efficiency =		90%	
Process Weight (Tons/Hr) =		$(127.4 \text{ lbs/hr}) \div (2000 \text{ lbs/ton}) =$	0.0637 Tons/Hr
Compliance Determination			
Emission Limit =		$4.10P^{0.67} =$	0.65 lbs/hr
Uncontrolled PM emission rate =		$(127.4)(0.74)(1 - 0.70) =$	28.3 lbs/hr
Controlled PM emission rate =		$(127.4)(0.74)(1-0.7)(1-0.9)(1-0.9) =$	0.282 lbs/hr

At the maximum hourly design rate, the controlled particulate matter emission is approximately two times less than the allowable emission rate. It is highly unlikely that the allowable emission rate will be exceeded with the control device operating properly. Therefore, the monitoring and recordkeeping will include periodic monitoring of the control device.

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

There will be no PM₁₀ emissions from the paint mix room (EP-12) because all of the paints being mixed will be in the liquid form. Since there will be no particulate emissions from this unit, 10 CSR 10-6.400 will not be applicable to this unit.

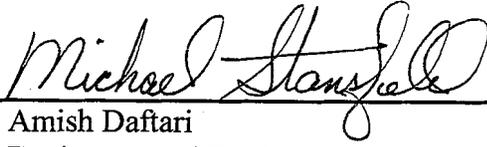
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

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).

Prepared by:

for 
Amish Daftari
Environmental Engineer