

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

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APR 7 2008

CERTIFIED MAIL: 7004 1350 0003 1415 5650
RETURN RECEIPT REQUESTED

Mr. Jim Koclanes
Director
GKN Aerospace Services, Inc.
142 J.S. McDonnell Boulevard
St. Louis, MO 63042

RE: GKN Aerospace Services, Inc., Plant No. 189-1489
Permit Number: OP2008-023

Dear Mr. Koclanes:

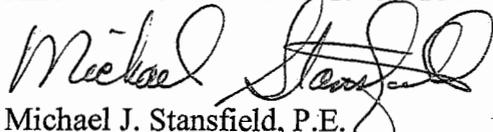
Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

If you have any questions or need additional information regarding this permit, please contact the departments' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:jdn

Enclosure

c: Ms. Tamara Freeman, US Environmental Protection Agency Region VII
St. Louis Regional Office
PAMS File: 2001-04-096



Missouri Department of Natural Resources
Air Pollution Control Program

TITLE V

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: OP2008-023
Expiration Date: APR 3 2013
Installation ID: 189-1489
Project Number: 2001-04-096

Installation Name and Address

GKN Aerospace Services, Inc.
142 J.S. McDonnell Boulevard
St. Louis, MO 63042
St. Louis County

Parent Company's Name and Address

GKN North America Services, Inc.
550 Warrenville Road
Lisle, IL 60532

Installation Description:

GKN Aerospace Services (GKN) manufactures various aerospace components. The components are sold to aircraft and space vehicle manufacturers for integration into final aerospace and defense products. These products include military and commercial aircraft, helicopters, missiles, space launch vehicles and other space systems and sensing systems. Examples of permitted equipment include paint spray booths, halogenated solvent degreasers, boilers, and plating lines. GKN is a major source of trichloroethylene, a hazardous air pollutant (HAP).

APR 4 2008

Effective Date


Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

GKN manufactures various aerospace components. The components are sold to aircraft and space vehicle manufacturers for integration into final aerospace and defense products. These products include military and commercial aircraft, helicopters, missiles, space launch vehicles and other space systems and sensing systems. Examples of permitted equipment include paint spray booths, halogenated solvent degreasers, boilers, and plating lines. GKN is a major source of trichloroethylene, a hazardous air pollutant (HAP).

Reported Air Pollutant Emissions, tons per year								
Year	Volatile Organic Compounds (VOC)	Hazardous Air Pollutants (HAPs)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Carbon Monoxide (CO)	Lead (Pb)	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter 2.5-10 Microns (PM-2.5)
2002	34.68	1.18	.01	4.52	1.83	0.0	12.12	Not reported
2003	36.72	1.39	.01	4.62	1.91	0.0	12.67	Not reported
2004	31.32	1.56	.01	3.90	1.31	0.0	12.26	10.18
2005	43.33	1.28	.02	5.51	3.08	0.0	19.20	15.81
2006	38.86	.81	.09	7.01	10.79	0.0	19.85	17.20

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) STLCO APCP Construction Permit #6258 (STLCO APCP Operating Permit #6694)
- 2) STLCO APCP Construction Permit #6259 (STLCO APCP Operating Permit #6693)
- 3) STLCO APCP Construction Permit #6953
- 4) STLCO APCP Construction Permit #6954

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations. All of the information provided in the table is for informational purposes only. It shall not be construed to create any limits, conditions or requirements.

STL CO OPERATING PERMIT #	EIQ POINT NO.	EMISSION UNIT NO.	LOCATION		MANUFACTURER	MODEL NUMBER	YEAR INSTALLED	DESCRIPTION
			BLDG	POST				
6953	BL-001-01	BL-001-01	5		Nebraska Boiler	A4827	2005	External Combustion Boiler rated at 120.3 MMBTU
6854	BL-001-02	BL-001-02	5		Nebraska Boiler	A4828	2005	External Combustion Boiler rated at 120.3 MMBTU
6788	AS-STL-01	AS-STL-01	PW					Plant-wide adhesive/sealant usage
N/A	BF-001-03	BF-027-03	1					Hand wipe solvent building fugitives in building 01
N/A	BF-002-03	BF-029-03	2					Hand wipe solvent building fugitives in building 02
N/A	BF-STL-01	BF-STL-01	PW					Plant-wide Fugitive Painting
N/A	BF-STL-02	BF-STL-02	PW					Other miscellaneous plant-wide solvent building fugitives
N/A	BF-STL-02	CC-STL-01B	PW					Plant-wide spray gun cleaning
N/A	BF-STL-03	BF-STL-03	PW					Hand wipe solvent building fugitives in buildings other than 01, 02
N/A	CC-STL-01	CC-STL-01A	PW					Plant-wide cold cleaners greater than 1 gal and 1 ft ² surface area
6714	CL-001-01	SB-027-01A,B	1	32BB	DeVilbiss		1945	Paint and Sanding Booth
6713	CL-001-01	SB-027-02A,B	1	32BB	DeVilbiss		1943	Paint and Sanding Booth
6712	CL-001-01	SB-027-03A,B	1	32BB	DeVilbiss		1943	Paint and Sanding Booth
6711	CL-001-01	SB-027-04A,B	1	32BB	DeVilbiss		1943	Paint and Sanding Booth
6715	CL-001-01	SB-027-05	1	32BB	DeVilbiss		1943	Paint and Sanding Booth
6693 (CP 6259)	CL-002-01	SB-029-01	2	A11	DeVilbiss		1997	Paint, Adhesive and Sanding Booth
6825	CL-002-01	SB-029-02	2	I13	Inside Dimensions	CAT-28-DT	2002	Spray/Drying Booth #1
6826	CL-002-01	SB-029-03	2	I13	Inside Dimensions	CAT-20-DT	2002	Spray/Drying Booth #2
6690	VD-001-01	VD-027-01	1	U30	Phillips	R-41E	1998	Small Vapor degreaser (trichloroethylene)
6694	VD-002-01	VD-029-01	2	B12	Baron-Blakeslee	DP 16	1997	Large Vapor degreaser (trichloroethylene)
N/A	None	HW-STL-01	PW					Plant-wide handling of hazardous waste generated from aerospace activities (not subject to RCRA)
6716	None	GB-027-01	1	Q17	Vacu-Blast	020195-05	1968	Walk-in grit blaster 12', Cyclone & Bag Filter

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. These emission units may, however, be included in the Emissions Inventory Questionnaire (EIQ). All of the information provided in the table is for informational purposes only. It shall not be construed to create any limits, conditions or requirements.

STL CO OPERATING PERMIT #	EIQ POINT NO.	EMISSION UNIT NO.	LOCATION		MANUFACTURER	MODEL NUMBER	YEAR INSTALLED	DESCRIPTION
			BLDG	POST				
N/A	CC-STL-01	CC-STL-01C	PW					Plant-wide cleaning units less than 1 gal or 1 ft ² surface area
N/A	CU-STL-01	CU-STL-01	PW					Plant-wide Composite Emissions
6788	CU-STL-01	CU-STL-01	2	A7				Composite Material Mfg. (electrovert process)
N/A	CS-STL-01	CS-027-01	1	Z30				(5) Natural gas make-up air heaters (12.2 MMBtu/hr)
N/A	CS-STL-01	CS-STL-01	PW					Plant-wide combustion (indirect fired natural gas < 10 MMBtu/hr)
N/A	CT-STL-01	CT-STL-01A	PW					Plant-wide forced draft cooling towers (3 for bldg 1 & 3 for bldg 2)
N/A	CU-STL-01	MS-029A-04	2	H17				Fiber placement machine for composites
N/A	BF-STL-01	MP-STL-01	PW					Plant-wide maintenance painting
N/A	None	LH-STL-01	PW					Miscellaneous lab hoods (5)
N/A	None	MS-STL-01	PW					Particulate creating sources (metal & composite working operations such as milling, use of cutting oils, cutting, grinding, sanding & load out of chips & cuttings; the majority of which are vented inside buildings) (5)
N/A	Various	OV-STL-01	PW					Electric curing ovens (3)
N/A	Various	OV-STL-02	PW					Plant-wide electric burn-off ovens
N/A	None	VR-STL-01	PW					Plant-wide diesel/no. 2 fuel oil refueling – vehicle &/or tank
N/A	None	SC-STL-01	PW					Plant-wide salt corrosion chambers
N/A	None	ST-STL-D	PW					Plant-wide diesel/no. 2 fuel oil storage tanks (<=10,000 gallons) (4)
N/A	None	WE-STL-01	PW					Plant-wide welding (2)
N/A	None	DT-STL-01	PW					Quench baths (2)
N/A	None	DT-STL-02	PW					Heated wax tanks (wax, peel coat, etc.)
N/A	None	FC-027-01	PW					Floor cleaning
N/A	None	MS-STL-03	PW					Bundling/packaging systems
N/A	None	MT-STL-01	PW					Miscellaneous coolant storage tanks (12)
N/A	None	OV-STL-03	PW					Process ovens (hydrogen releases from metal plating operations) (2)
N/A	None	PT-STL-01	PW					Small process tanks (etching, plating, cleaning, stripping, etc.)
N/A	None	WT-STL-01	PW					Waste oil storage tanks (3)
N/A	None	MS-027-04	1					Hazardous waste shelter for less than 90 day storage in drums and containers

6701	PI-0127-01	PI-027-058	1	BB23		1976	Liquid penetrant inspection booth (not subject to MACT GG)
6702	PI-0127-01	PI-027-059	1	BB23		1976	Dye penetrant inspection booth (not subject to MACT GG)
6691	MS-001-06	EF-027-098	1	CC34/ Basement		1997	Cutting fluid concentrator
6700	PL-001-02	3320, 3596, 3976	1	GG30		1961	Aluminum Process Line (Tanks 1-22)
6706	PL-001-03	4244, 5438	1	GG30			Titanium Process Line (Tanks 1,2,5,6,7,8,9,11)
6692	PL-002-01	EF029A-016	2	B12		1997	Metal Strip & Preparation Line Acid/Alkaline; Mist Eliminator (Tanks 1-17)
None	None	EG-026-01	10		GM		Diesel fire pump (< 500 hp)
None	None	EG-029-01	2	F1			Natural gas emergency generator (< 500 hp)
None	None	EG-029A-02	2	M17			Natural gas emergency generator (200 hp)
None	None	EG-020-01	9				Diesel emergency generator (< 500 hp)

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 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitations:

- 1) The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant of opacity greater than 20%.
- 2) A source with a 20% limit may emit air contaminants with an opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six minutes in any 60 minutes.
- 3) Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements, the requirements shall not apply.

Monitoring:

- 1) The permittee shall conduct a visible emissions inspection walk-through. The walk-through will consist of a visual inspection of each emission unit and control device at the facility for the presence of visible emissions. If no visible or other significant emissions are observed using these procedures, then no further observations are required. If visible emissions are perceived or believed to exceed the applicable opacity standard, the source representative shall conduct a Method 9 observation for that emission unit.
- 2) The following monitoring schedule must be maintained:
 - Weekly observations shall be conducted for a minimum of eight consecutive weeks after initial permit issuance. Should no violation of this regulation be observed during this period then,
 - Observations must be made once every two 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,
 - Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.

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) Maintain records of all observation results noting whether any air emissions (except for water vapor) were visible from the emission units (see attachment A).
- 2) Maintain records any Method 9 test performed in accordance with this permit condition (see attachment B).
- 3) Maintain records of any equipment malfunctions.

Reporting:

Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than 30 days after the discovery of an exceedance of the opacity limit.

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.

EU0010—Boilers

STLCO OPERATING PERMIT NUMBER	EMISSION UNIT NUMBER	EQ POINT NUMBER	FEDERAL			DESCRIPTION (For information only, this does not create any permit requirements)
			40 CFR Part 60, Subpart Db: Industrial-Commercial- Institutional Steam Generating Units	Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	10 CSR 10-5.030: Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating	
6953	BL-001-01	BL-001-01	X	6953	X	External Combustion Boiler, 120.3 MMBTU
6954	BL-001-02	BL-001-02	X	6954	X	External Combustion Boiler, 120.3 MMBTU

Permit Condition EU0010-01

40 CFR Part 60, Subpart Db
 Industrial-Commercial-Institutional Steam Generating Units

Emission Limitations:

Nitrogen Oxide (NO_x) emissions are limited to 0.2 lb/MMBtu.

Monitoring/ Recordkeeping:

Compliance with the emission limits under this section is determined on a 30-day rolling average basis (§ 60.44b(i)).

Reporting:

- 1) Submit semiannual compliance reports to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176 by the 30th day following the end of the reporting period, in accordance with 60.49b(g) and 60.49b(w).
- 2) Submit a Notification of Alternative Fuel Use if at any time an alternative fuel is used in the boilers.
- 3) Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than 30 days after the discovery of an exceedance of the nitrogen oxide emission limit.

Permit Condition EU0010-02

10 CSR 10-6.060

Construction Permits Required

Emission Limitation:

- 1) The flue gas recirculation (FGR) system shall be in operation in accordance with the manufacturer's guidelines, whenever the boiler(s) is (are) in operation.
- 2) Should the FGR system on one of the boilers fail to operate properly, the other boiler shall be utilized exclusively, or to the greatest extent possible, until the failed system is prepared.
- 3) Number two (#2) fuel oil shall only be burned when natural gas is unavailable to GKN due to an emergency or for testing of the burner. Interruptible gas service does not constitute an emergency.
- 4) For testing purposes, or should an emergency arise requiring the burning of #2 oil, the oil utilized shall contain no more than five hundredths of one percent (0.05%) sulfur by weight.
- 5) GKN shall minimize the fuel oil used for testing purposes. The fuel oil burners shall be removed from the boilers after each test.

Monitoring/Recordkeeping:

- 1) Maintain a record of the sulfur content of the fuel oil as purchased (ex. bill of lading, MSDS, or other), except as shown in the Statement of Basis, "Other Regulatory Determinations."
- 2) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- 1) Notify the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 of any FGR failure by no later than the next working day.
- 2) Notify the St. Louis County Air Pollution Control Program of fuel oil testing at least 24 hours prior to testing, and in the case of an emergency, by no later than the next working day.
- 3) Submit a written report of the amount of fuel oil used during each test within ten days of the end of the testing.

EU0020—Miscellaneous Specialty Coating Emission Units

STLCO OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION (For information only, this does not establish any permit requirements)
			10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
NA	AS-STL-01	AS-STL-01	X	Plant-wide adhesive/sealant usage
NA	BF-STL-02	BF-STL-02	X	Other miscellaneous plant-wide solvent building fugitives

X = Applicable

NA = Not Applicable

Permit Condition EU0020-001

10 CSR 10-5.295

Control of Emissions from Aerospace Manufacture and Rework Facilities

Emission Limitations:

- 1) Specialty coatings shall be limited to a volatile organic compounds (VOC) content as expressed in Table I of this rule (Appendix 1).
- 2) Monthly averaging within specialty coating type may be used.

Monitoring/Recordkeeping:

- 1) Maintain a list of coatings in use with category and VOC content as applied.
- 2) Record coating usage on a monthly basis.
- 3) Maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through averaging under this rule.
- 4) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.
- 5) The requirements for primers and topcoats do not apply to the use of low-volume coatings in these categories for which the annual total of each separate formulation used at a facility does not exceed 50 gal, and the combined annual total of all such primers and topcoats used at a facility does not exceed 200 gal.

Reporting:

Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than 30 days after the discovery that the VOC content limit set in this rule (Appendix 1) is exceeded.

EU0030—Hand Wipe Solvent Building Fugitives

STLCO OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		DESCRIPTION (For information only, this does not create any permit requirements)
			40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Hand wipe Solvent Cleaning Operations	10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
NA	BF-STL-03	BF-STL-03	X	X	Hand wipe solvent building fugitives in buildings other than 1 (27), 2 (29) and 3 (29A)
NA	BF-001-03	BF-027-03	X	X	Hand wipe solvent building fugitives in building 1
NA	BF-002-03	BF-029-03	X	X	Hand wipe solvent building fugitives in building 2 and 3

X = Applicable

NA = Not Applicable

Permit Condition EU0030-001

10 CSR 10-6.075

Maximum Achievable Control Technology

40 CFR 63 Subpart GG

National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities

10 CSR 10-5.295

Control of Emissions from Aerospace Manufacture and Rework Facilities

Emission Limitations:

- 1) Housekeeping measures:
 - a) Workers shall place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in aerospace production in closed containers (such as plastic bags, dome top cans or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs or equivalent used for very small cleaning are exempt from this requirement.
 - b) Unless the permittee satisfies the requirements of (d), below, store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
 - c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
 - d) Demonstrate to the Administrator (or delegated State or local authority) that equivalent or better alternative measures are in place compared to the use of closed containers for the solvent-laden materials described in paragraph (a) of this section, or the storage of solvents described in paragraph (b) of this section.
- 2) Hand-wipe cleaning
 - a) Each owner or operator of an affected hand-wipe cleaning operation subject to this subpart, shall use cleaning solvents that meet one of the following requirements:
 - i) Meet one of the composition requirements in section 63.744 (Table 1) of the Aerospace MACT.
 - ii) Have a composite vapor pressure of 45 mm Hg or less at 20° Celsius. (68° Fahrenheit)
 - iii) Demonstrate that the volume of hand-wipe cleaning solvents used in affected cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be established as part of an approved alternative plan administered by the State.
 - b) The following cleaning operations are exempt from the requirements of (2) Hand-wipe cleaning:
 - i) Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;
 - ii) Cleaning during the manufacture, assembly, installation, maintenance or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine, etc.);
 - iii) Cleaning and surface activation prior to adhesive bonding;
 - iv) Cleaning of electronic parts and assemblies containing electronic parts;
 - v) Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to air heat exchangers and hydraulic fluid systems;
 - vi) Cleaning of fuel cells, fuel tanks, and confined spaces;
 - vii) Surface cleaning of solar cells, coated optics, and thermal control surfaces;
 - viii) Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft;

- ix) Cleaning of metallic and non-metallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;
 - x) Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing;
 - xi) Cleaning of aircraft transparencies, polycarbonate or glass substrates;
 - xii) Cleaning operations, using nonflammable liquids, conducted within five feet of energized electrical systems. Energized electrical systems means AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections; and
 - xiii) Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR 82.4.
- 3) For cleaning solvents subject to 10 CSR 10-5.295, maintain:
- a) A list of materials with corresponding water contents for aqueous and semi-aqueous hand-wipe cleaning solvents;
 - b) A current list of cleaning solvents in use with their respective vapor pressure or, for blended solvents, VOC composite vapor pressure for all vapor pressure compliant hand-wipe cleaning solvents. This list shall include the monthly amount of each applicable solvent used; and
 - c) A current list of exempt hand-wipe cleaning processes for all cleaning solvents with a vapor pressure greater than 45 mmHg used in exempt hand-wipe cleaning operations. This list shall include the monthly amount of each applicable solvent used.

Monitoring/Recordkeeping:

- 1) Each owner or operator of a new or existing cleaning operation shall record the information specified below:
 - a) The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.
 - b) For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements specified in 63.744(b)(1) or for semi-aqueous cleaning solvents used for flush cleaning operations specified in 63.752(b)(2):
 - i) The name of each cleaning solvent used; and
 - ii) All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements.
 - iii) Annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
 - c) For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements specified in 63.744(b)(1), but does comply with the vapor pressure requirement in 63.744(b)(2):
 - i) The name of each cleaning solvent used;
 - ii) The composite vapor pressure of each cleaning solvent used;
 - iii) All vapor pressure test results, if appropriate, data and calculations used to determine the composite vapor pressure of each cleaning solvent; and
 - iv) The amount (in gallons) of each cleaning solvent used each month at each operation.
 - d) For each cleaning solvent used for exempt hand-wipe cleaning operations specified in 63.744(e) that does not conform to the vapor pressure or composition requirements of 63.744(b):
 - i) The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and
 - ii) A list of the exempt processes to which the cleaning operation applies.
- 2) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- 1) Each owner or operator of a hand wipe solvent operation subject to MACT Subpart GG shall submit the following information to St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176:
 - a) Semiannual reports occurring every six months that identify:
 - i) Any instance where a non-compliant cleaning solvent is used for a nonexempt hand-wipe cleaning operation;
 - ii) A list of any new cleaning solvents used for hand-wipe cleaning in the previous six (6) months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements; and
 - iii) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.
 - b) The permittee shall submit semiannual reports 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
- 2) Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than 30 days after the discovery of any exceedance of applicable requirements.

EU0040—Cold Cleaners

STLCO OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL 10 CSR 10- 5.300: Control of Emissions from Solvent Metal Cleaning	DESCRIPTION (For information only, this does not create any permit requirements)
NA	CC-STL-01	CC-STL-01A	X	Plant-wide cold cleaners greater than 1 gal and 1 ft ² surface area that are not subject to 10 CSR 10-5.295

X = Applicable

NA = Not Applicable

Permit Condition EU0040-001

10 CSR 10-5.300
Control of Emissions from Solvent Metal Cleaning (3)(A)1 and (B)1

Emission Limitations:

- 1) Equipment specifications (section (3)(A)1 Cold Cleaners):
 - a) The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).
 - b) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors while in the closed position, or enclosed reservoir, which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner.
 - c) Exemptions under (1)(D) of the regulation may apply. •
 - d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the director.

- e) When one or more of the following conditions exist the design of the cover shall be such that it can easily be operated with one hand and without disturbing the solvent vapors in the tank. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance or by a power system).
 - i) The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F)
 - ii) The solvent is agitated.
 - iii) The solvent is heated.
 - f) A drainage facility allowing parts to drain while the cover is closed is required.
 - g) If an internal drainage facility as in (g) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
 - h) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard.
 - i) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
 - j) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must have one of the following control devices:
 - i) A freeboard ratio of at least 0.75
 - ii) Water cover (solvent must be insoluble in and heavier than water)
 - iii) Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65%) and is approved by the director prior to use.
- 2) Operating procedures (section (3)(B)1 Cold Cleaners):
- a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
 - b) Cleaned parts shall be drained in the free board area for 15 seconds, or until dripping stops, whichever is longer.
 - c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until trained service personnel are able to restore operation within the established parameters.
 - d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
 - e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable.
 - f) Waste solvent shall be stored in closed containers only.
- 3) Operator and Supervisor Training (section (3)(C)):
- a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
 - b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
 - c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months.

Monitoring/ Recordkeeping:

- 1) Monthly records of the following shall be maintained:
 - a) Types and amounts of solvent containing waste material from cleaning or degreasing operations:
 - i) Transferred to a contract reclamation service or disposal facility
 - ii) Distilled on the premises
 - b) Maintenance and repair logs for the cold cleaner and any associated control equipment.

- 2) For cold cleaners subject to (3)(A)1 (a) or (b) the following records for each purchase of cold cleaning solvent shall be maintained:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in mmHg at 20°C (68°F)
- 3) Keep a record of the cold cleaner training for each employee.
- 4) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than 30 days after the discovery of any exceedance of the cold cleaner requirements established in 10 CSR 10-5.300.

EU0050—Spray Gun Cleaning Operations

STLCO OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		DESCRIPTION (for information only, this does not create any permit requirements)
			40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Spray Gun Cleaning Operations	10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	
NA	BF-STL-02	CC-STL-01B	X	X	Plant-wide spray gun cleaning

X = Applicable NA = Not Applicable

Permit Condition EU0050-001

10 CSR 10-6.075
Maximum Achievable Control Technology
 40 CFR 63 Subpart GG
National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities
 10 CSR 10-5.295
Control of Emissions from Aerospace Manufacture and Rework Facilities

Emission Limitations:

- 1) Housekeeping measures:
 - a) Operators shall place aerospace production cleaning solvent-laden cloth, paper, or other absorbent applicators used for cleaning in closed containers (such as plastic bags or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.

- b) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers (such as flip-top or squirt bottles with small openings, safety cans or drums with closed bungs).
 - c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
- 2) Spray gun cleaning:
- a) Each owner or operator of a new or existing spray gun cleaning operation shall use one or more of the techniques, or their equivalent, specified in this section. Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below de minimis levels specified in 63.741 (f) are exempt from these requirements.
 - i) Enclosed Systems. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the cleaning solvent through the gun. If leaks are found during the monthly inspection required in 63.751 (a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
 - ii) Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
 - iii) Disassembled spray gun cleaning. Disassemble the spray gun and clean the components in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
 - iv) Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

Monitoring/Recordkeeping:

- 1) A record of all leaks from enclosed spray gun cleaners that includes for each leak found:
 - a) Source identification
 - b) Date leak was discovered
 - c) Date leak was repaired
- 2) Each owner or operator using an enclosed spray gun cleaner shall keep records of the monthly visual inspections.
- 3) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- 1) Each owner or operator of a spray gun cleaning operation subject to MACT Subpart GG shall submit the following information to St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176:
 - a) Semiannual reports occurring every six months that identify:
 - i) Any instance where a non-compliant spray gun cleaning method is used.
 - ii) Any instance where leaks from enclosed spray gun cleaners are not repaired within 15 days.
 - iii) If the operations have been in compliance for the semiannual period, submit a statement that the cleaning operations have been in compliance with the applicable standards.
 - b) The permittee shall submit semiannual reports 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
- 2) Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of applicable requirements.

EU0060—Coating Lines

ST/CO OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL		2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	DESCRIPTION (for information only, this does not create any permit requirements)
			1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities		
6711	CL-001-01	SB-027-01	X	X	NA	Paint and Sanding Booth (2-Stg)
6712	CL-001-01	SB-027-02	X	X	NA	Paint and Sanding Booth (2-Stg)
6713	CL-001-01	SB-027-03	X	X	NA	Paint and Sanding Booth (2-Stg)
6714	CL-001-01	SB-027-04	X	X	NA	Paint and Sanding Booth (2-Stg)
6715	CL-001-01	SB-027-05	X	X	NA	Paint and Sanding Booth (2-Stg)
6693	CL-002-01	SB-029-01	X	X	6259	Paint, Adhesive and Sanding Booth (3-Stg)
6925	CL-002-001	SB-029-02	X	X	NA	Spray/Drying Booth #1 (3-Stg)
6926	CL-002-001	SB-029-02	X	X	N/A	Spray/Drying Booth #2 (3-Stg)

X = Applicable NA = Not Applicable

Permit Condition EU0060-001

10 CSR 10-6.075
Maximum Achievable Control Technology
 40 CFR 63 Subpart GG
National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities
 10 CSR 10-5.295
Control of Emissions from Aerospace Manufacture and Rework Facilities

Emission Limitations:

- 1) Primers:
 - a) Shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
 - b) Shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
 - c) The VOC content may be used as a surrogate for the organic HAP content.
- 2) Topcoats:
 - a) Shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

- b) Shall be limited to a organic HAP content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
- c) The VOC content may be used as a surrogate for the organic HAP content.
- 3) Averaging (as described in 63.745(e) (2) & .750 (d)) can be used to meet the Primer and Topcoat limits.
- 4) Work practice standards:
 - a) Primers and topcoats shall be handled in a manner to minimize spills.
 - b) Primers and topcoats shall be applied in a manner consistent with the requirements of this rule.
- 5) Inorganic HAP Control:
 - a) Primer or topcoats containing inorganic HAP that are spray applied shall be applied in a booth or hangar in which airflow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.
 - b) Control the air stream either:
 - i) For existing sources:
 - (A) Before exhausting it to the atmosphere, pass the air stream through a dry particulate filter system certified using the methods described in §63.750(o) to meet or exceed the efficiency data points in Tables 1 and 2 of this section; or
 - (B) Before exhausting it to the atmosphere, pass the air stream through a waterwash system that shall remain in operation during all coating application operations; or
 - (C) Before exhausting it to the atmosphere, pass the air stream through an air pollution control system that meets or exceeds the efficiency data points in Tables 1 and 2 of this section and is approved by the permitting authority.
 - ii) For new sources:
 - (A) By passing the air stream through a dry particulate filter system certified using the methods described in 63.750(o) to meet or exceed the efficiency data points in Tables 3 and 4 of this section; or
 - (B) Before exhausting it to the atmosphere, pass the air stream through an air pollution control system that meets or exceeds the efficiency data points in Tables 3 and 4 of this section and is approved by the permitting authority.
- 6) The usage of specialty coatings as defined in 40 CFR 63 Subpart GG is not covered by Subpart GG.
- 7) The particulate control requirements of 63.745(g)(1) through (g)(3) do not apply to the operations listed under 63.745(g)(4)(i) through (g)(4)(x).
- 8) The requirements for primers and topcoats do not apply to the use of low-volume coatings in these categories for which the annual total of each separate formulation used at a facility does not exceed 50 gal, and the combined annual total of all such primers and topcoats used at a facility does not exceed 200 gal.

Monitoring:

For dry filters, install differential pressure gauge across filter bank. Continuously monitor the pressure drop when inorganic HAP containing primers and topcoats are spray applied and take corrective action if pressure drop falls outside the manufacturer's limits.

Recordkeeping:

- 1) Primers and Topcoats:
 - a) Record coating volume usage on a monthly basis.
 - b) Record the name and VOC content as applied of each primer and topcoat used in production areas.
 - c) For low HAP content primers and topcoats recordkeeping complying with 63.752 (c)(3) may be used.
 - d) If averaging is used to meet the primer and topcoat limits recordkeeping shall comply with 63.752 (c)(4).
- 2) Inorganic HAP Control:
 - a) Record the pressure drop (either electronically or manually) once each operating shift that inorganic HAP containing primer or topcoat is spray applied.

- i) The pressure drop records are deemed to be complete if 95% of the readings are recorded for all of the booths subject to this rule in any six (6) month period. If the last reading recorded correctly prior to any group of missed readings and the first reading recorded correctly after the same group of missed readings are both below the pressure drop limit, the missed readings are deemed to be below the pressure drop limit.
 - ii) For this provision, a shift is an 8-hour period (12:00 midnight to 8:00 AM, 8:00 AM to 4:00 PM, and 4:00 PM to 12:00 midnight).
- 3) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- 1) Each owner or operator of coating operation subject to MACT Subpart GG shall submit the following information to St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176:
 - a) Semiannual reports occurring every six (6) months that identify:
 - i) Any times when a primer or topcoat application containing inorganic HAP was not immediately shut down when the pressure drop across a dry particulate filter was outside limit(s) as specified by the filter or booth manufacturer.
 - ii) Any times where primers or topcoats exceeded the appropriate VOC or organic HAP limit.
 - iii) If the operations have been in compliance for the semiannual period, submit a statement that the operations have been in compliance with the applicable standards.
 - b) Annually reports that identify the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer.
 - c) The permittee shall submit semiannual reports 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
- 2) Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than 30 days after the discovery of any exceedance of applicable requirements.

Permit Condition EU0060-002

10 CSR 10-6.400

Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitations:

- 1) Units must meet one of the following limits:
 - a) The concentration of 0.01 grains/scf.
 - b) The concentration of .03 grains/scf.
 - c) The concentration of .02 grains/scf.

Monitoring/Recordkeeping:

Maintain copy of one-time calculation to demonstrate compliance (Calculation section of Statement of Basis).

Reporting:

Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176,

Jefferson City, MO 65102-0176, no later than 30 days after the discovery of any exceedance of the particulate matter emission limit.

Permit Condition EU0060-003

10 CSR 10-6.060

Construction Permits Required

ST. LOUIS COUNTY AIR POLLUTION CONTROL PROGRAM Construction Permit # 6259

Requirements of the Construction Permit Number: #6259 (Operating Permit #6693, Paint, Adhesive and Sanding Booth)

Emission Limitations:

VOC and HAP emissions from booth # SB-029-01 are limited to 1.75 tons per year from aerospace topcoats, primers and specialty coatings on a 12 month rolling total.

Monitoring/Recordkeeping:

- 1) Maintain monthly records of aerospace topcoats, primers and specialty coatings usage and VOC and HAP content per gallon, on site, which clearly demonstrates compliance with the Emission Limitation above.
- 2) Records shall be complete within ten days following the end of each month.
- 3) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

If the records indicate that a violation of the above emission limitation or standard has occurred, the permittee shall notify the St. Louis County Air Pollution Control Program by no later than the next working day after the records are complete. This notification is not required to be certified by a responsible official.

EU0070—Handling Of Hazardous Waste

ST LOUIS COUNTY OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION (for information only, this does not create any permit requirements)
			40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP - Hazardous Waste Handling	
NA	NA	HW-STL-01	X	Plant-wide handling of hazardous waste generated from aerospace activities (not subject to RCRA)

X = Applicable

NA = Not Applicable

Permit Condition EU0070-001

10 CSR 10-6.075

Maximum Achievable Control Technology

40 CFR 63 Subpart GG

National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities

Emission Limitations:

All waste that contains HAP, but is not subject to RCRA standards, shall be handled and transferred to or from containers, vats, vessels, and piping systems in such a manner that minimizes spills.

Monitoring/Recordkeeping/Reporting:

Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176 no later than 30 days after the discovery of any violation of the requirements specified in Emission Limitations.

EU0080—Particulate Emitting Sources

ST LOUIS COUNTY OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL	DESCRIPTION (for information only, this does not create any permit requirements)
			10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes	
6716	NA	GB-027-02	X	Walk-in grit blaster

X = Applicable

NA = Not Applicable

Permit Condition EU0080-001

10 CSR 10-6.400

Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitations:

- 1) Units must meet one of the following limits:
 - d) The emission rate of 17.199 lb particulate matter/hour; or
 - e) The concentration of 0.100 grains/scf.

Monitoring/Recordkeeping:

Maintain copy of one-time calculation to demonstrate compliance (Calculation section of Statement of Basis).

Reporting:

Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 and the Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than 30 days after the discovery of any exceedance of the particulate matter emission limit.

EU0090—Vapor Degreasers

FEDERAL

ST. LOUIS COUNTY OPERATING PERMIT NUMBER	EQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart T and 10 CSR 10-6.075: Halogenated Solvent Cleaning NESHAP	2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	DESCRIPTION
					(for information only, this does not create any permit requirements)
6690	VD-001-01	VD-027-01	X	#6325	Vapor degreaser (trichloroethylene)
6694	VD-002-01	VD-029-01	X	#6258	Vapor degreaser (trichloroethylene)

X = Applicable

NA = Not Applicable

Permit Condition EU0090-001

10 CSR 10-6.075

Maximum Achievable Control Technology

40 CFR 63 Subpart T

National Emission Standards for Halogenated Solvent Cleaning

Emission Limitations:

- 1) Emissions shall not exceed 150 kg per m² of solvent/air interface per month, averaged over three consecutive months using the three month rolling average compliance method.
- 2) This rule is not applicable to the listed units when they contain a solvent that is not subject to 40 CFR Part 63, Subpart T.

Monitoring/Recordkeeping:

- 1) Dates and amounts of solvent added to or removed from each unit.
- 2) On the first operating day of every month, ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.
- 3) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- 1) Annual Solvent Emission Report as required by 40 CFR 63.468(g) – due by February 1st for the prior year.
- 2) Exceedance Report – due by the 30th day following the end of each calendar half or quarter as required by 40 CFR 63.468(h).

Equipment Compliance Options:

The equipment standards as stated in 40 CFR Part 63, Subpart T, may be used to show compliance instead of the overall emission limit listed above. If one of the alternate standards is used, the monitoring, recordkeeping and reporting requirements listed in the regulation, for the standard chosen, will be followed.

Permit Condition EU0090-002

10 CSR 10-6.060

Construction Permits Required

ST. LOUIS COUNTY AIR POLLUTION CONTROL PROGRAM Construction Permit #6258 (Operating Permit #6694)

Emission Limitations:

Net trichloroethylene usage (amount added minus amount removed) is limited to two thousand five hundred sixty-three (2563) gallons per year on a 12 month rolling total for degreaser VD-002-01.

Monitoring/Recordkeeping:

- 1) Maintain monthly usage records on site.
- 2) Maintain records that show the 12 month rolling total of trichloroethylene usage, which clearly demonstrate compliance with the limit established above.
- 3) Retain records for the previous 60 month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Upon discovery of a violation of the above emission limitation, the permittee shall notify the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Center, Chesterfield, MO 63017 by no later than the next working day. This notification is not required to be certified by a responsible official.

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 St. Louis County Air Pollution Control Program or Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.080 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 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall complete and submit an 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 on the date specified by 10 CSR 10-6.110(3)(D)F 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 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 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 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. Qualified personnel shall perform all tests.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources' Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement

occupations to be accredited by the Missouri Department of Natural Resources' Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. 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.

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.

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

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.070 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 that 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 this facility 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 St. Louis County Air Pollution Control Program inspection reports.

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- a) Residential, recreational, institutional, retail sales, hotel or educational premises.
- b) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- c) Premises other than those in paragraphs (1)A.1. and (2) of the rule when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when thirty percent (30%) or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or seventy-five percent (75%) of those exposed if fewer than 20 people are exposed.

10 CSR 10-5.450 Coating of VOC Emissions from Traffic Coatings

- 1) No person shall supply, sell, offer for sale, apply, or solicit the application of any traffic coating, which at the time of sale or manufacture contains more than 1.26 pounds VOC per gallon, excluding water, exempt compounds, and any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the St. Louis metropolitan area without the approval of the staff director.
- 2) All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to, being accessed, filled, emptied, or repaired.

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 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*

V. St. Louis County Air Pollution Control Code Requirements

Section 612.040, Air Quality Standards and Air Pollution Control Regulations

Saint Louis County Air Pollution Control Program may enforce Missouri Code of State Regulations as adopted and promulgate by the Air Conservation Commission of the State of Missouri consisting of Title 10, Division 10, Chapter 5 and 6.

Section 612.100, Emergency Abatement of Violation

By written approval of the County Executive, any facility indirectly or directly discharging any air contaminant in violation of the St. Louis County Air Pollution Control Program Code where it is the opinion of the director that the discharge creates an emergency which requires immediate action to protect the public health, shall order the person in writing to discontinue immediately.

Section 612.110, Permits Required

The permittee shall obtain St. Louis County Department of Health (DOH) operating permits for its installation. The permittee shall not commence construction, modification, or major modification of any installation subject to this rule without obtaining a permit from St. Louis County DOH.

Section 612.120, Permits to be Visibly Affixed or Placed

The permittee shall visibly affix St. Louis County DOH Permit on or near permitted equipment.

Section 612.200, Testing Prior to Granting of Operating Permit

- 1) *Emission Standards*: Before an authority to construct or permit to operate is granted, the director may require the applicant to conduct tests to determine the kind or amount of the air contaminant emitted from the equipment. Such tests shall be conducted, reviewed and certified by a licensed engineer. The permittee shall notify the County of the time and place of testing for the purpose of witnessing the test.
- 2) *Recordkeeping Requirements*: Records shall be kept during testing as approved in a test protocol submitted to the County prior to testing.
- 3) *Monitoring Requirements*: Monitoring during testing shall be as approved in a test protocol submitted to the County prior to testing.
- 4) *Reporting Requirements*: The permittee shall report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Center, Chesterfield, MO 63017, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any condition which could possibly cause an exceedance of this regulation.

Section 612.220, Suspension or Revocation of Permits

The firector may suspend or revoke a permit to operate or authority to construct for willful or continued violation of the St. Louis County Air Pollution Control Code

Section 612.250 Fees, When Payable, Exceptions

Fees for authority to construct and operating permits in the amounts provided in Section 612.260 shall be paid to the director except as provided in subsections 3 and 4 of this rule.

Section 612.260, Schedules

The permittee shall pay St. Louis County DOH Construction Permit fees when applicable and annual Operating Permit fees in accordance with the rule.

Section 612.280, Testing by Order of the Board

- 1) *Emission Standards*: If any article, machine, equipment or other contrivance is in violation of the St. Louis County Air Pollution Control Code, the director may file with the Board for its approval an order directing the permittee of such equipment to conduct such tests as are necessary in the opinion of the director and approved by the Board to determine whether the equipment is in violation of this Code.
- 2) *Monitoring/Recordkeeping Requirements*: The entire test results shall be reviewed and certified by an engineer licensed under Chapter 327, RSMo 1959. The engineer shall be selected by the permittee and approved by the Board.
- 3) *Reporting Requirements*: The permittee shall give at least seven days notice prior to the commencement of the test. The permittee shall report to the St. Louis County, Air Pollution Control Program, 74 Clarkson Wilson Center, Chesterfield, MO 63017.

Section 612.290, Right of Entry; Inspections; Samples

The permittee shall allow the Director or His agent to enter at all times with reasonable notice, inspect any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants, inspect any records relating to the use of any equipment or control apparatus which affect or may affect the emission of air contaminants, and sample any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants.

Section 612.310, Upset Conditions, Breakdown or Scheduled Maintenance

The permittee shall report to the St. Louis County, Air Pollution Control Program, 74 Clarkson Wilson Center, Chesterfield, MO 63017 within 24 hours of occurrence of any unavoidable upset in or breakdown of equipment and in case of shutdown for necessary scheduled maintenance, the intent to be shutdown shall be reported to Air Pollution Control Program 24 hours prior to shutdown.

Section 612.340, Air Pollution Nuisances Prohibited

It is unlawful for the permittee to cause of such quantities of soot, cinders, noxious acids, fumes and gases or other particulate matter from whatever source in such place or matter as to be detrimental to any person or the public or to endanger the health, comfort and safety of any person or the public, injury or damage to property or business.

Section 612.380, Interfering with or Obstructing Division Personnel

No Person shall hinder, resist, interfere with or obstruct the director or any Division employee in carrying out any duty for the director or the Board.

Section 612.530, Saint Louis County Department of Health Asbestos Abatement Rules and Regulations—Registration, Notification and Performance Requirements

The permittee shall conduct all asbestos abatement projects within the procedures and requirements established in 612.530.

VI. 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 St. Louis County APCP or Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) Semiannual Monitoring Reports
 - i) The permittee shall submit a semiannual report of all required monitoring by:
 - (1) October 1st for monitoring which covers the January through June time period, and
 - (2) April 1st for monitoring which covers the July through December time period.
 - ii) Each semiannual monitoring report must identify any deviations from permit requirements since the previous report that have been monitored by the monitoring systems required under the permit, and any deviation from the monitoring, recordkeeping and reporting requirements of the permit.
 - iii) These reports shall be submitted to the St. Louis County APCP, 74 Clarkson Wilson Center, Chesterfield, MO 63017 and Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.
 - b) Annual Compliance Report
 - i) These reports shall be submitted to the St. Louis County APCP, 74 Clarkson Wilson Center, Chesterfield, MO 63017, Missouri Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, and EPA Region 7 Missouri Air Compliance Coordinator, 901 N. 5th Street, Kansas City, KS 66101.
 - c) Supplemental Reports
 - i) 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.
 - ii) 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.

- iii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iv) Any other deviations identified in the permit as requiring more frequent reporting than the 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.
- d) 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.
- e) 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, §(5)(C)3, §(6)(C)3.B, 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, 74 Clarkson Wilson Center, Chesterfield, MO 63017. 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

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, 74 Clarkson Wilson Center, Chesterfield, MO 63017 as well as the Environmental Protection Agency (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

Mr. Jim Koclanes, Director, Facilities, was established as the responsible official for GKN in the administrative amendment received on October 12, 2007. 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 St. Louis County APCP, 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,
- 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) St. Louis County APCP, Missouri Department of Natural Resources 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.

VII. Appendices

APPENDIX 1: Specialty Coating VOC Limitations

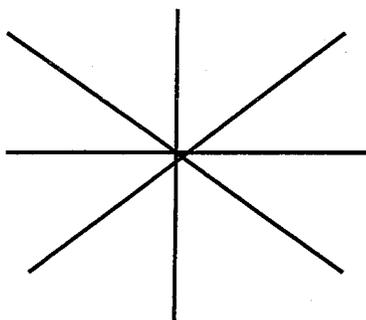
Specialty Coating	Pounds per Gallon	Grams per Liter	Specialty Coating	Pounds per Gallon	Grams per Liter
Ablative Coating	5.0	600	Flexible Primer	5.3	640
Adhesion Promoter	7.4	890	Flight Test Coatings:		
Adhesive Bonding Primers:			Missile or Single Use Aircraft	3.5	420
Cured at 250°F or below	7.1	850	All Others	7.0	840
Cured above 250°F	8.6	1030	Fuel-Tank Coating	6.0	720
Adhesives:			High-Temperature Coating	7.1	850
Commercial Interior Adhesive	6.3	760	Insulation Covering	6.2	740
Cyanoacrylate Adhesive	8.5	1020	Intermediate Release Coating	6.3	750
Fuel Tank Adhesive	5.2	620	Lacquer	6.9	830
Nonstructural Adhesive	3.0	360	Maskant:		
Rocket Motor Bonding Adhesive	7.4	890	Bonding Maskant	10.3	1230
Rubber-Based Adhesive	7.1	850	Critical Use and Line Sealer Maskant	8.5	1020
Structural Autoclavable Adhesive	0.5	60	Seal Coat Maskant	10.3	1230
Structural Nonautoclavable Adhesive	7.1	850	Metallized Epoxy Coating	6.2	740
Antichafe Coating	5.5	660	Mold Release	6.5	780
Bearing Coating	5.2	620	Optical Anti-Reflective Coating	6.3	750
Caulking and Smoothing Compounds	7.1	850	Part Marking Coating	7.1	850
Chemical Agent-Resistant Coating	4.6	550	Pretreatment Coating	6.5	780
Clear Coating	6.0	720	Rain Erosion-Resistant Coating	7.1	850
Commercial Exterior Aerodynamic Structure Primer	5.4	650	Rocket Motor Nozzle Coating	5.5	660
Compatible Substrate Primer	6.5	780	Scale Inhibitor	7.3	880
Corrosion Prevention Compound	5.9	710	Screen Print Ink	7.0	840
Cryogenic Flexible Primer	5.4	645	Sealants:		
Cryoprotective Coating	5.0	600	Extrudable/Rollable/Brushable Sealant	2.3	280
Dry Lubricative Material	7.3	880	Sprayable Sealant	5.0	600
Electric or Radiation-Effect Coating	6.7	800	Silicone Insulation Material	7.1	850
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	6.7	800	Solid Film Lubricant	7.3	880
Elevated Temperature Skydrol Resistant Commercial Primer	6.2	740	Specialized Function Coating	7.4	890
Epoxy Polyamide Topcoat	5.5	660	Temporary Protective Coating	2.7	320
Fire-Resistant (interior) Coating	6.7	800	Thermal Control Coating	6.7	800
			Wet Fastener Installation Coating	5.6	675
			Wing Coating	7.1	850

ATTACHMENT B: Visible Emission Method 9 Observation Form

This compliance worksheet may be used to meet the recordkeeping requirements for Permit Condition PW001.

Source Name _____
 Address _____
 Observation Point _____
 Stack Identification _____
 Stack: Distance from _____ Height _____
 Temp _____ %RH _____
 Sky Condition _____
 Color of Emission _____

Quadrant: Draw symbols below in appropriate place to mark wind direction and speed, observer's location and sun location.



(Stack is at center)

Observer _____
 Observer's _____
 Signature _____
 Date _____ Certification Date _____
 Observer Began _____ Ended _____

COMMENTS:

	0	15	30	45		0	15	30	45
0					41				
1					42				
2					43				
3					44				
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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 Initial Application, received April 18, 2001;
- 2) Part 70 Operating Permit Administrative Amendment Application, received September 23, 2004;
- 3) Part 70 Operating Permit Significant Modification Application, dated November 30, 2005;
- 4) Part 70 Operating Permit Administrative Amendment Application, received March 21, 2007;
- 5) Part 70 Operating Permit Administrative Amendment Application, received October 12, 2007;
- 6) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 7) Email from Ron Rosner, ERM, to Andrea Strickland, Barr Engineering, September 21, 2001;
- 8) Email from Ron Rosner, ERM, to Andrea Strickland, Barr Engineering, November 09, 2001;
- 9) 2002 through 2006 Emissions Inventory Questionnaires;
- 10) STLCO APCP Construction Permit #0160 (STLCO APCP Operating Permit #6716)
- 11) STLCO APCP Construction Permit #0219 (STLCO APCP Operating Permit #6710)
- 12) STLCO APCP Construction Permit #0220 (STLCO APCP Operating Permit #6709)
- 13) STLCO APCP Construction Permit #0599 (STLCO APCP Operating Permit #6706)
- 14) STLCO APCP Construction Permit #0644 (STLCO APCP Operating Permit #6701)
- 15) STLCO APCP Construction Permit #0645 (STLCO APCP Operating Permit #6702)
- 16) STLCO APCP Construction Permit #0949 (STLCO APCP Operating Permit #6700)
- 17) STLCO APCP Construction Permit #1520 (STLCO APCP Operating Permit #6696)
- 18) STLCO APCP Construction Permit #1087 (STLCO APCP Operating Permit #6698)
- 19) STLCO APCP Construction Permit #6260 (STLCO APCP Operating Permit #6692)
- 20) STLCO APCP Construction Permit #6319 (STLCO APCP Operating Permit #6691)
- 21) STLCO APCP Construction Permit #6325 (STLCO APCP Operating Permit #6690)
- 22) STLCO APCP Operating Permit #6703 (Installed 1964, no Construction Permit)
- 23) STLCO APCP Operating Permit #6704 (Installed 1964, no Construction Permit)
- 24) STLCO APCP Operating Permit #6705 (Installed 1964, no Construction Permit)
- 25) STLCO APCP Operating Permit #6711 (Installed 1943, no Construction Permit)
- 26) STLCO APCP Operating Permit #6712 (Installed 1943, no Construction Permit)
- 27) STLCO APCP Operating Permit #6713 (Installed 1943, no Construction Permit)
- 28) STLCO APCP Operating Permit #6714 (Installed 1945, no Construction Permit)
- 29) STLCO APCP Operating Permit #6715 (Installed 1943, no Construction Permit)
- 30) STLCO APCP Construction/Operating Permit #6788
- 31) STLCO APCP Construction/Operating Permit #6825
- 32) STLCO APCP Construction/Operating Permit #6826

Applicable Requirements Included in the Operating Permit but Not in the Application

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.

- 1) 10 CSR 10-5.040, *Use of Fuel in Hand-Fired Equipment Prohibited*,
This rule is applicable to all facilities in the St. Louis non-attainment area. As such, it has been included in the operating permit as a core permit requirement.
- 2) 10 CSR 10-6.180, *Measurement of Emissions of Air Contaminants*,

This rule has been included in the operating permit in order to provide citing for the allowance of requests for emissions data results. On past forms issued by the Air Pollution Control Program, including the application for this permit, it was automatically marked as an administrative rule. It is no longer judged to be solely administrative and is, therefore, included in the operating permit as a core permit requirement.

- 3) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
10 CSR 10-5.090, *Restriction of Emission of Visible Air Contaminants*, has been rescinded and removed from the SIP. It has been replaced by 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*.
- 4) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*
10 CSR 10-5.050, *Restriction of Emission of Particulate Matter from Industrial Processes*, has been rescinded and removed from the SIP. It has been replaced by 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*, which is applicable to the walk-in grit blaster.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 10 CSR 10-5.030 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*
Per 10 CSR 10-5.030(1)(F), the boilers are exempt from this rule because they are subject to the provisions of 10 CSR 10-6.070.
- 2) 10 CSR 10-5.120, *Information on Sales of Fuels to be Provided and Maintained*; 10 CSR 10-5.130, *Certain Coals to be Washed*.
These rules do not apply to the installation, as they do not burn coal or residual oil.
- 3) 10 CSR 10-5.220, *Control of Petroleum Liquid Storage, Loading and Transfer*; 10 CSR 10-5.443, *Control of Gasoline Reid Vapor Pressure*; 10 CSR 10-5.500, *Control of Emissions from Emissions from Volatile Organic Liquid Storage*.
These rules do not apply to the diesel/no. 2 fuel oil tanks or refueling operations because tank sizes are less than 40,000 gallons and gasoline is not stored or dispensed at this installation.
- 4) 10 CSR 10-5.300, *Control of Emission From Solvent Metal Cleaning*.
This rule does not apply to the halogenated degreasers due to the exemption under 10 CSR 10-5.300(1)(D)1.C.
- 5) 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating*.
This rule has not been included in the operating permit because it is Air Pollution Control Program policy not to enforce the requirements of this rule that overlap with the requirements of 10 CSR 10-5.295, *Control of Emissions from Aerospace Manufacture and Rework Facilities*. GKN is subject to 10 CSR 10-5.295.
- 6) 10 CSR 10-5.455, *Control of Emissions from Solvent Cleanup Operations*.
This rule has not been included in the operating permit because the installation is subject to the Aerospace NESHAP and is therefore exempt from the rule.
- 7) 10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides*; 10 CSR 10-6.270, *Acid Rain Source Permits Required*.
These rules have not been included in the operating permit because the potential to emit NO_x from the two boilers does not exceed 100 tons and otherwise do not meet the applicability requirements of the rules.
- 8) 10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions from Existing Major Sources*.

This rule has not been included in the operating permit because the installation is subject to one or more rules under Title 10, Chapter 5 of the Code of State Regulations (CSR) that applies to volatile organic compound (VOC) emissions from a product process or a raw material, intermediate or product tank.

9) 10 CSR 10-5.540, *Control of Emissions from Batch Process Operations*.

This rule has not been included in the operating permit because the installation does not operate any batch operations which meets the requirement of a potential to emit 100 tons per year of VOCs nor do they have any operations within the SIC codes listed in the rule.

10) 40 CFR Part 64, *Compliance Assurance Monitoring*.

This rule does not apply to this facility because it does not operate any control devices with pre-control emissions exceeding the thresholds.

Construction Permit Revisions

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

1. STLCO APCP Construction Permit #5739 (STLCO APCP Operating Permit #6695) language was modified to clarify the requirements of the permit.
2. STLCO APCP Construction Permit #6258 (STLCO APCP Operating Permit #6694) language was modified to clarify the requirements of the permit. In addition, the period for maintaining records was extended to 5 years to coincide with 10 CSR 10-6.065, *Operating Permits*, requirements.
3. STLCO APCP Construction Permit #6259 (STLCO APCP Operating Permit #6693) language was modified to clarify the requirements of the permit. In addition, the period for maintaining records was extended to 5 years to coincide with 10 CSR 10-6.065, *Operating Permits*, requirements.
4. STLCO APCP Construction Permit #6699, 6700, 6707 and 6708 on the Aluminum Line were combined into one permit, #6700. The process has changed since the original issuance of the permits and current potential emissions were evaluated and found to warrant only a single permit. Permit #6699, 6707, and 6708 were voided.
5. STLCO APCP Construction Permit #6697 and 6706 on the Titanium Line were combined into one permit, #6706. The process has changed since the original issuance of the permits and current potential emissions were evaluated and found to warrant only a single permit. Permit #6697 was voided.

NSPS Applicability

- 1) 40 CFR 60 Subpart Db applies to EU0010, the external combustion boilers because the maximum rated capacity of the units exceed the applicability threshold of the subpart (> 100 MMBtu/hr).
- 2) 40 CFR 60 Subparts K, Ka and Kb do not apply to any of the storage tanks covered under this permit because the storage capacity of each tank is below each of the applicability thresholds of the subparts and because the tanks only store diesel/no. 2 fuel oil.

MACT Applicability

- 1) 40 CFR 63 Subpart N, *Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*, does not apply to GKN since the chrome anodizing tank is no longer in use and the permits have been terminated.

- 2) 40 CFR 63 Subpart T, *Halogenated Solvent Cleaning*, applies to each of the vapor degreasers that utilize trichloroethylene as the cleaning solvent.
- 3) 40 CFR 63 Subpart GG, *Aerospace Manufacturing and Rework Facilities*, applies to the installation as indicated in the permit. The Mechanical and Chemical Depainting Requirement do not apply to GKN because six or less completed aerospace vehicles are depainted in a calendar year.
- 4) 40 CFR 63 Subpart DD, *Hazardous Air Pollutants from Off-Site Waste and Recovery Operations*, does not apply to the handling or storage of hazardous waste since the installation does not receive off-site waste.
- 5) 40 CFR Part 63, Subpart MMMM, *Miscellaneous Metal Parts (Surface Coating)* does not apply to this facility as stated in the January 20, 2004 letter where GKN withdrew their Part 1 application for this MACT standard. The MACT does not apply because the coating operations at the facility are either exempt according to the rule and/or the coating operations are already addressed by the Aerospace NESHAP.
- 6) 40 CFR Part 63, Subpart WWWW, *Reinforced Plastic Composites Production* does not apply to this facility as stated in the August 18, 2003 letter where GKN withdrew their Part 1 application for this MACT standard. The facility does not process enough styrene-containing materials to meet the applicability levels of this MACT.
- 7) 40 CFR Part 63, Subpart DDDDD, *Boilers/Process Heaters* did apply to this facility due to EU0010, the external combustion boilers that have a maximum rated capacity that exceeds the applicability threshold of the subpart (> 10 MMBtu/hr). However, this rule was vacated on July 30, 2007, and is therefore no longer applicable. If the MACT is repromulgated, GKN will comply with requirements as required.

NESHAP Applicability

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition sections of the subpart, which makes the subpart applicable to all sources. It is included as a core permit requirement.

Other Regulatory Determinations

- 1) 10 CSR 10-6.260(3)(c) applies to the generators listed in this permit. However, because they combust only diesel/fuel oil no. 2, the Air Pollution Control Program has determined that the installation will show compliance with all 10 CSR 10-6.260 limitations and that no enhanced monitoring and recordkeeping requirements will be required to show compliance with this permit.
- 2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*, was not included as an applicable regulation for the generators because the rule specifically states that liquid fuels are not to be considered in determining the "process weight" introduced into the emission unit.
- 3) 10 CSR 10-5.295, *Control of Emissions from Aerospace Manufacturing and Rework Facilities*, had not yet been incorporated into the SIP at the time the application was submitted and was therefore listed as state-only enforceable. The rule has since incorporated into the SIP and is now federally enforceable.

Calculations

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

EQ Point	Emission Unit	County Permit #	Description	No. of spray guns	Rate of each gun* (gpm)	Solids Content	Paint Density (lb/gal)	Estimated Air Flow (cu.ft./min)	Process Rate (lb/hr)*	Transfer Efficiency	Capture Efficiency	Control Efficiency	Building Control Efficiency	PM Emissions (lb/hr)*	Allowable by Rule (lb/hr)	PM Emissions (gr/ht)*	Allowable by Rule - Table 1 (gr/cu.ft)
CL-001-01	SB-027-01	6714	Spray booth 1	1	0.08	78%	12	41,000	56	55%	90%	90%	50%	-	-	0.01	0.053
CL-001-01	SB-027-02	6713	Spray booth 2	1	0.08	78%	12	44,000	56	55%	90%	90%	50%	-	-	0.01	0.053
CL-001-01	SB-027-03	6712	Spray booth 3	1	0.08	78%	12	46,000	56	55%	90%	90%	50%	-	-	0.01	0.053
CL-001-01	SB-027-04	6711	Spray booth 4	1	0.08	78%	12	42,000	56	55%	90%	90%	50%	-	-	0.01	0.053
CL-001-01	SB-027-05	6715	Spray booth 5	1	0.08	78%	12	41,000	56	55%	90%	90%	50%	-	-	0.01	0.053
CL-002-01	SB-029-01	6693	Clean & Prime booth	1	0.08	78%	12	12,000	56	55%	90%	90%	50%	-	-	0.03	0.071
CL-002-01	SB-029-02	6825	Spray booth 1	1	0.08	78%	12	17,000	56	55%	90%	90%	50%	-	-	0.02	0.071
CL-002-01	SB-029-03	6826	Spray booth 2	1	0.08	78%	12	17,000	56	55%	90%	90%	50%	-	-	0.02	0.071
N/A	GB-027-02	6716	Walk in grit blaster	N/A	N/A	N/A	N/A	6,000	17,000	N/A	100%	incl. in AP-42	N/A	12	17	-	-

*Note: For demonstration purposes, maximum continuous use is assumed. Actual operations and emissions are lower. Grit blast emissions based on 1.38 lb/ton emission factor from AP42 13.2.6-1; this factor is used for demonstration purposes only -- actual emissions are insignificant. Moreover, the grit blaster is exempt from construction permitting (by 10 CSR 10-6.061 (B)6.C., if less than 100 cu.ft.) and therefore may be exempt from the process weight rate rule per 10 CSR 10-6.400(1)B.8.

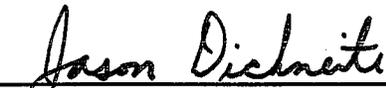
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

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 that 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:



Jason Dickneite
Environmental Engineer