



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2008-040
Expiration Date: SEP 15 2013
Installation ID: 101-0054
Project Number: 2007-10-091

Installation Name and Address

Master Marble, Inc.
1292 Southwest 125th Road
Holden, MO 64040
Johnson County

Parent Company's Name and Address

Master Marble, Inc.
P.O. Box 185
Holden, MO 64040

Installation Description:

The installation produces marble countertops, travena countertops and bath tubs.

The installation is subject to 40 CFR Part 63 Subpart WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, and has accepted a voluntary condition on VOC and HAP emissions to obtain this Intermediate Operating Permit

SEP 16 2008

Effective Date

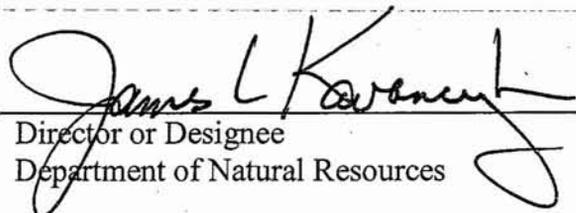

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	4
EMISSION UNITS WITHOUT LIMITATIONS.....	4
DOCUMENTS INCORPORATED BY REFERENCE.....	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
PERMIT CONDITION PW001	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	5
PERMIT CONDITION PW002	5
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations and.....	5
40 CFR Part 63, Subpart A General Provisions and Subpart WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production	5
PERMIT CONDITION PW003	9
10 CSR 10-6.060 Construction Permits Required.....	9
Construction Permit #102006-008, Issued October 11, 2006	9
PERMIT CONDITION PW004	9
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants.....	9
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	10
IV. CORE PERMIT REQUIREMENTS	11
V. GENERAL PERMIT REQUIREMENTS.....	19
VI. ATTACHMENTS	23
ATTACHMENT A	24
ATTACHMENT B	25
ATTACHMENT C	26
ATTACHMENT D	27

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The installation produces marble countertops, travena countertops and bath tubs. The countertops are produced in the Marble Countertop area, and the bath tubs are produced in the Fiberglass area.

Marble Countertop Production Area:

The marble countertop production process begins with the preparation of molds by spraying the mold with a wax. A mechanical (atomized) spray booth is used to apply a thin coating of gelcoat onto the mold and allowed to cure (EP-01). The gelcoat spray system consists of separate sources of catalyst and resin, with an airless hand spray gun that mixes them together into an atomized resin/catalyst stream. The resin is made in the mixing vessel (EP-04) using marble resin, pigment, catalyst, limestone, and vein pigment. The resin mix is manually poured on top of the dried gelcoat and allowed to cure. The finished product is then pulled out of the mold and the rough edges are sanded or grinded and then buffed. A portion of the sanded material is recycled back to the mixer (EP-04).

The travena countertop production process begins with the preparation of molds by spraying the mold with a wax. The resin is made in the mixing vessel (EP-04) using marble resin, pigment, catalyst, and oyster shell dust. The resin mix is manually poured into the mold and allowed to cure. The finished product is then pulled out of the mold and the rough edges are sanded or grinded and then buffed. A portion of the sanded material is recycled back to the mixer (EP-04).

Fiberglass Production Area

The bath tub production process begins with the preparation of molds by spraying the mold with a wax. A thin coating of gelcoat is then sprayed onto the mold and allowed to cure. The marble resin is made in the mixing vessel (EP-06), and is manually poured on top of the dried gelcoat and allowed to cure. Then a resin is mechanically applied with fiberglass as a chop on top of the poured resin. (EP-03) For these reinforced layers, a device is attached to the sprayer system to chop glass fiber into predetermined lengths and project it to merge with the resin mix stream. The stream precoats the chop, and both are deposited simultaneously on the molded marble resin. The finished product is then pulled out of the mold and the rough edges are sanded or grinded and then buffed. A portion of the sanded material is recycled back to the mixer (EP-04)

The various product molds are also produced in this area. The shape is created with a plug. The plug is the exact size and shape of the finished product. The plug is sprayed with a wax. Orange tooling gelcoat is used to give the mold a resistant surface. The tooling is sprayed onto the plug and allowed to cure. Fiberglass resin is then applied over the tooling in a mechanical chop application. The resin is mixed with methyl ethyl ketone peroxide (MEKP), which acts as an activator and hardening agent. When the new mold has completely cured, the plug is removed, the mold is sanded and grinded to meet design specifications and placed into the production process.

Orange tooling is also used to repair molds. The mold is cleaned with acetone and lightly sanded. Spot repairs involve spraying the part with tooling,, allowing the tooling to cure, then sanding. This process is repeated until the damaged is filled. All mold production and repair occurs in spray booth EP-03.

Other operations at the installation include receiving and sifting of travena stone (EP-13), propane heating (EP-05), and equipment cleaning (EP-08).

The installation is subject to 40 CFR part 63 Subpart WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production and has accepted a voluntary condition on VOC and HAP emissions to obtain this Intermediate Operating Permit.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2006	0.79	--	--	9.05	--	--	--
2005	1.02	--	0.12	10.41	0.02	--	--
2004	0.01	--	0.1	13.34	0.02	--	--
2003	--	--	0.027	10.077	0.005	--	--
2002	--	--	0.07	3.57	0.009	--	--

Note: The installation reports HAP usage as VOC or PM10 in accordance with 10 CSR 10-6.110.

EMISSION UNITS WITH LIMITATIONS

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

There are no emission units that have emission unit specific limitations. All emission limitations are regulated plant wide.

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source (2006 EIQ EP#)

Gelcoat Spray Booth #1 (EP-01)

Resin Spray Booth #3 (EP-02)

Tooling Gelcoat for molds/ Fiberglass Resin Spray Booth #2 and sifting of travena stone (EP-03)

Mixing/Casting Vessel #1 (EP-04)

Propane Heaters (EP-05)

Mixing/Casting Vessel #2 (EP-04)

Belt Sander (EP-07)

2 Sawing tables (EP-07)

Grinding Booth (EP-07)

Sander (EP-07)

Hand Sander (Hand held 7" sander) (EP-07)

Solvent Cleaning and Solvent tank (EP-08)

Transfer of marble resin from totes to day tank and temporary storage in open vessel (totally enclosed) (EP-08)

Manual pouring of marble composite resin from mixing/casting vessel into molds (EP-09)

Manual pouring of travena resin for travena countertops (EP-08)

Tumbler (no EP)

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

Construction Permit #102006-008

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

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

Emission Limitation:

1. The permittee shall emit less than 100 tons of VOC in any consecutive 12-month period.
2. The permittee shall emit less than 10 tons of any individual hazardous air pollutant (HAP), and less than 25 tons of any combination of HAPs in any consecutive 12-month period.

Monitoring:

The permittee shall monitor the emissions of VOC and HAPs.

Recordkeeping:

1. The permittee shall calculate and record the installation-wide emissions of VOC and HAPs. The emission factors used in these calculations shall be derived according to the procedures of 40 CFR part 63 Subpart WWWW. Documentation verifying the calculation of all emission factors shall be kept on site.
2. The permittee may speciate Styrene emissions, and combine all other HAPs to track monthly emissions. If the combination of Styrene and all other HAPs exceeds 10 tons per year, then the permittee shall speciate all HAPs in the recordkeeping logs to maintain compliance with the emission limit.
3. Attachments C and D contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
4. These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
5. All records shall be maintained for five years

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.

PERMIT CONDITION PW002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations and 40 CFR Part 63, Subpart A General Provisions and Subpart WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Emissions Limitation:

- (a) The permittee must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice standards in Table 4 to this subpart that apply, regardless of the quantity of HAP emitted. [§63.5805(b)]

Monitoring:

- (a) The permittee shall demonstrate each month that the weighted average of the organic HAP emissions limits in Table 3 or 5 to this subpart is met. The permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all the open molding operations. [§63.5810(c)]
- (1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the installation for the last 12-month period to determine the applicable organic HAP emissions limit. To do this, multiply the individual organic HAP emissions limits in Table 3 or 5 to this subpart for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 3 of this section. [§63.5810(c)(1)]

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i=organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;
Material_i=neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;
n=number of operations.

- (2) Each month calculate the weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4 of this section. [§63.5810(c)(2)]

$$\text{Actual Weighted Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EF_i=Actual organic HAP emissions factor for operation type i, lbs/ton;
Material_i=neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;
n=number of operations.

- (3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the installation is in compliance. [§63.5810(c)(3)]

Continuous Compliance Demonstration:

- (a) The permittee must be in compliance at all times with the work practice standards in Table 4 to this subpart, as well as the organic HAP emissions limits in Tables 3, or 5, or the organic HAP content limits in Table 7 to this subpart. [§63.5835(a)]
- (b) The permittee must always operate and maintain the affected source according to the provisions in §63.6(e)(1)(i). [§63.5835(c)]
- (c) The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the installation is meeting any organic HAP content limits in Table 7 to this subpart if the permittee is averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [§63.5895(c)]
- (d) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, the permittee must retain the records of resin and gel coat organic HAP content, and the permittee must include the list of these resins and gel coats and identify their application methods in the semiannual compliance reports. If after the permittee has initially demonstrated that a specific combination of an individual resin or gel coat, and application method meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the installation changes the application method, then the permittee again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 or 5 of this subpart, the permittee must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average. [§63.5895(d)]
- (e) The permittee must demonstrate continuous compliance with each standard in §63.5805 according to the methods specified in paragraphs (a)(1) through (3) of this section. [§63.5900(a)]
- (1) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(2)]
- (2) Compliance with organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in §63.5895(d). [§63.5900(a)(3)]
- (3) Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the installation. [§63.5900(a)(4)]
- (f) The permittee must report each deviation from each applicable standard in §63.5805. The deviations must be reported according to the requirements in §63.5910. [§63.5900(b)]
- (g) During periods of startup, shutdown or malfunction, the permittee must meet the organic HAP emissions limits and work practice standards that apply. [§63.5900(c)]

Record Keeping:

- (a) The permittee must keep the records listed in paragraphs §63.5915(a)(1) through (3). [§63.5915(a)]

- (1) A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.5915(a)(1)]
- (2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [§63.5915(a)]
- (b) The permittee must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3, 5, and 7 to this subpart. [§63.5915(c)]
- (c) The permittee must keep a certified statement that the installation is in compliance with the work practice requirements in Table 4 to this subpart, as applicable. [§63.5915(d)]
- (d) The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]
- (e) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]
- (f) The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years. [§63.5920(c)]
- (g) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

Reporting:

- (a) The permittee must submit all of the notifications in Table 13 to this subpart that apply by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart. [§63.5905(a)]
- (b) If any information changes that was submitted in any notification, the permittee must submit the changes in writing to the Administrator within 15 calendar days after the change. [§63.5905(b)]
- (c) The permittee must submit each report in Table 14 to this subpart that applies. [§63.5910(a)]
- (d) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section: [§63.5910(c)]
 - (1) Company name and address. [§63.5910(c)(1)]
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
 - (3) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
 - (4) If the installation had a startup, shutdown, or malfunction during the reporting period and the installation took actions consistent with the startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i). [§63.5910(c)(4)]
 - (5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]
- (e) For each deviation from an organic HAP emissions limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction. [§63.5910(d)]
 - (1) The total operating time of each affected source during the reporting period. [§63.5910(d)(1)]

- (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.5910(d)(2)]
- (f) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to this subpart. [§63.5910(h)]

PERMIT CONDITION PW003

10 CSR 10-6.060 Construction Permits Required
Construction Permit #102006-008, Issued October 11, 2006

The permittee shall keep all of the solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers. [Special Condition #2]

PERMIT CONDITION PW004

10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

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

Monitoring/Record Keeping/Reporting:

As detailed in Core Permit Requirements.

III. Emission Unit Specific Emission Limitations

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

None

IV. Core Permit Requirements

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

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

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

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and
 4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may

be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

- (4) **Master Marble, Inc.** may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if **Master Marble, Inc.** fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-3.090 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

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

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

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage
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- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

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

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

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

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

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

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

The application utilized in the preparation of this permit was signed by **Rick Huffman, Director** of Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received 10/18/2007;
- 2) 2006 Emissions Inventory Questionnaire, received 07/12/2007; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

None

Construction Permit Review

Construction Permit #102006-008

This permit was issued October 11, 2006 for remedial action. This permit contains all equipment at the installation, and contains two special conditions that apply plant wide. Special Condition #1 limits the installation to less than 250 tons of VOC in any consecutive 12 month period. This condition was not included in the Operating Permit because the voluntary condition taken to obtain this Intermediate Operating Permit is more stringent. Special Condition #2 requires all solvent and cleaning solutions be kept in covered, labeled containers. This condition appears in the permit as Permit Condition PW003.

New Source Performance Standards (NSPS) Applicability

None

Maximum Available Control Technology (MACT) Applicability

40 CFR part 63 Subpart WWWW-National Emission Standards for Hazardous Air Pollutants:
Reinforced Plastic Composites Production

The installation is subject to this regulation because they were a major source when the first compliance deadline passed. Although the installation accepted a voluntary limit on HAP emissions below the major source threshold to obtain this Intermediate Operating Permit, due to EPA's "Once in, Always in" policy, this source is still subject to this MACT.

The installation meets the definition of existing. The installation does not perform continuous laminating, casting, or pultrusion operations. The installation does not use any control devices to maintain compliance with this regulation. Therefore, the provisions of the rule that apply to these operations are not included in this Operating Permit.

The installation has chosen to use the weighted average compliance option. [§63.5810(c)] to demonstrate compliance with the emission standards. This option requires a monthly determination of a weighted average emission limit for resins and gelcoats subject to the emission limit.

Work Practice Standards (see Table 4)

Cleaning:

Only HAP free cleaning agents be used. The installation only uses acetone, which satisfies this requirement.

Storage:

All containers are to be kept closed except during the addition or removal of HAP containing materials. Countertop resins are pumped from closed storage containers to a day tank. This container must be closed at all times resin is not being received.

Mixing:

Manual mixing of composite used in polymer casting of countertops takes place in an open container. Footnote 1 of Table 4 states that, for polymer casting mixing operations, containers with a surface area of 500 in² or less may be open while active mixing is taking place. The tank has a diameter of 23 inches, and therefore has a surface area less than 500 in².

The applicable tables of 40 CFR part 63 Subpart WWWW are shown below:

Table 1 to Subpart WWW of Part 63--Equations To Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

Table 1 to Subpart WWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

As specified in §63.5810, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:

If your operation is a new or existing...

Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat) ...

Use this organic HAP Emissions Factor (EF) Equation for materials less than 33 percent organic HAP (19 percent for nonatomized gel coat) ...

Operation	Equation
1. open molding operation	
a. manual resin application	<ul style="list-style-type: none"> i. nonvapor-suppressed resin $EF = \{(0.286 \times \text{HAP}) - (0.0529)\} \times 2000$ ii. vapor-suppressed resin $EF = 0.126 \times \text{HAP} \times 2000$ iii. vacuum bagging/closed-mold curing with roll-out $EF = \{(0.286 \times \text{HAP}) - (0.0529)\} \times 2000$ iv. vacuum bagging/closed-mold curing without roll-out $EF = \{(0.286 \times \text{HAP}) - (0.0529)\} \times 2000$
b. atomized mechanical resin application	<ul style="list-style-type: none"> i. nonvapor-suppressed resin $EF = \{(0.714 \times \text{HAP}) - (0.18)\} \times 2000$ ii. vapor-suppressed resin $EF = 0.169 \times \text{HAP} \times 2000$ iii. vacuum bagging/closed-mold curing with roll-out $EF = \{(0.714 \times \text{HAP}) - (0.18)\} \times 2000$ iv. vacuum bagging/closed-mold curing without roll-out $EF = \{(0.714 \times \text{HAP}) - (0.18)\} \times 2000$
c. nonatomized mechanical resin application	<ul style="list-style-type: none"> i. nonvapor-suppressed resin $EF = \{(0.157 \times \text{HAP}) - (0.0165)\} \times 2000$ ii. vapor-suppressed resin $EF = 0.107 \times \text{HAP} \times 2000$ iii. closed-mold curing with roll-out $EF = \{(0.157 \times \text{HAP}) - (0.0165)\} \times 2000$ iv. vacuum bagging/closed-mold curing without roll-out $EF = \{(0.157 \times \text{HAP}) - (0.0165)\} \times 2000$
d. atomized mechanical resin application with robotic or augmented spray control	<ul style="list-style-type: none"> i. nonvapor-suppressed resin $EF = 0.169 \times \text{HAP} \times 2000$ ii. vapor-suppressed resin $EF = 0.107 \times \text{HAP} \times 2000$ iii. closed-mold curing with roll-out $EF = 0.169 \times \text{HAP} \times 2000$ iv. vacuum bagging/closed-mold curing without roll-out $EF = 0.107 \times \text{HAP} \times 2000$
e. filament application	<ul style="list-style-type: none"> i. nonvapor-suppressed resin $EF = \{(0.2746 \times \text{HAP}) - (0.0298)\} \times 2000$ ii. vapor-suppressed resin $EF = 0.12 \times \text{HAP} \times 2000$
f. atomized spray gel coat application	<ul style="list-style-type: none"> i. nonvapor-suppressed gel coat $EF = \{(0.3546 \times \text{HAP}) - (0.195)\} \times 2000$ ii. vapor-suppressed gel coat $EF = 0.445 \times \text{HAP} \times 2000$

g. nonatomized spray gel coat application	EF = 0.185 x (%HAP x 2000)	EF = ((0.4506 x (%HAP) - 0.0505) x 2000)
h. atomized spray gel coat application using robotic or automated spray	EF = 0.445 x (%HAP x 2000) x 0.73	EF = ((1.03646 x (%HAP) - 0.195) x 2000) x 0.73
a. heated air blown through molds	EF = 0.558 x (%HAP) x 2000	EF = 0.558 x (%HAP) x 2000
b. vented molds, but air is not heated	EF = 0.026 x (%HAP) x 2000	EF = 0.026 x (%HAP) x 2000

Footnotes to Table 1

- 1 The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart MNNM. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.
- 2 To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.
- 3 Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.
- 4 The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.
- 5 This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.
- 6 Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.
- 7 These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.
- 8 If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.

Table 3 to Subpart WWWW of Part 63—Organic HAP Emissions Limits for Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources that Emit Less Than 100 TPY of HAP

As specified in §63.5805, you must meet the following organic HAP emissions limits that apply to you:

If your operation type is...	And you use...	¹Your organic HAP emissions limit is....
1. open molding-corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	a. 113 lb/ton b. 171 lb/ton c. 123 lb/ton
2. open molding-CR/HS	a. mechanical resin application b. filament application c. manual resin application	a. 88 lb/ton b. 188 lb/ton c. 87 lb/ton
3. open molding-tooling	a. mechanical resin application b. manual resin application	a. 254 lb/ton b. 157 lb/ton
4. open molding-low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	a. 497 lb/ton b. 270 lb/ton c. 238 lb/ton
5. open molding-shrinkage controlled resins ²	a. mechanical resin application b. filament application c. manual resin application	a. 354 lb/ton b. 215 lb/ton c. 180 lb/ton
6. open molding-gel coat ³	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating c. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	a. 440 lb/ton b. 267 lb/ton c. 377 lb/ton d. 605 lb/ton e. 854 lb/ton f. 522 lb/ton
7. centrifugal casting-CR/HS	a. resin application with the mold closed, and the mold is vented during spinning and cure b. resin application with the mold closed, and the mold is not vented during spinning and cure c. resin application with the mold open, and the mold is vented during spinning and cure d. resin application with the mold open, and the mold is not vented during spinning and cure	a. 25 lb/ton ⁴ b. N/A-this is considered to be a closed molding operation c. 25 lb/ton ⁴ d. use the appropriate open molding emission limit ⁵

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average

² This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or a tooling resin.

³ If you only apply gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

8. centrifugal casting-non-CR/HS	<p>a. resin application with the mold closed, and the mold is vented during spinning and cure</p> <p>b. resin application with the mold closed, and the mold is not vented during spinning and cure</p> <p>c. resin application with the mold open, and the mold is vented during spinning and cure</p> <p>d. resin application with the mold open, and the mold is not vented during spinning and cure</p>	<p>a. 20 lb/ton⁴</p> <p>b. N/A-this is considered to be a closed molding operation</p> <p>c. 20 lb/ton⁴</p> <p>d. . use the appropriate open molding emission limit⁵</p>
9. pultrusion ⁶	N/A	Reduce total organic HAP emissions by at least 60 weight percent
10. continuous lamination/casting	N/A	Reduce total organic HAP emissions by at least 58.5 weight percent or not exceed an organic HAP emission limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus

⁴ For compliance purposes, calculate your emission factor using only the appropriate centrifugal casting equation in item 2 of Table 1 to this subpart, or a site specific emission factor for after the mold is closed as discussed in §63.5796.

⁵ Calculate your emission factor using the appropriate open molding covered cure emission factor in item 1 of Table 1 to this subpart, or a site specific emission factor as discussed in §63.5796.

⁶ Pultrusion machines that produce parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more are not subject to this requirement. Their requirement is the work practice of air flow management which is described in Table 4 to this subpart.

Table 4 to Subpart WWWW of Part 63—Work Practice Standards

As specified in §63.5805, you must meet the work practice standards in the following table that apply to you:

For...	You must...
1. a new or existing closed molding operation using compression/injection molding	Uncover, unwrap, or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be covered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC.
6. all mixing or BMC manufacturing operations ¹	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
7. all mixing or BMC manufacturing operations ¹	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. all mixing or BMC manufacturing operations ¹	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	<ol style="list-style-type: none">not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wetout area(s),not permit point suction of ambient air in the wet-out area (s) unless that air is directed to a control device,use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s),direct any compressed air exhausts away from resin and wet-out area(s),convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air,cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, andcover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

¹ Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Table 8 to Subpart WWWW of Part 63—Initial Compliance With Organic HAP Emissions Limits

As specified in §63.5860(a), you must demonstrate initial compliance with organic HAP emissions limits as specified in the following table:

For...	That must meet the following organic HAP emissions limit...	You have demonstrated initial compliance if...
1. open molding and centrifugal casting operations	a. an organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart	i. you have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in §63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, and/or ii. you demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or iii. you demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.
2. open molding centrifugal casting, continuous lamination/casting, SMC and BMC manufacturing, and mixing operations	a. reduce total organic HAP emissions by at least 95 percent by weight	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 95 percent by weight.
3. continuous lamination/casting operations	a. reduce total organic HAP emissions, by at least 58.5 weight percent, or b. not exceed an organic HAP emissions limit of 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency in Table 6 to this subpart and the calculation procedures specified in §§63.5865 through 63.5890, are reduced by at least 58.5 percent by weight. total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart and the calculation procedures specified in §§63.5865 through 63.5890, do not exceed 15.7 lbs of organic HAP per ton of neat resin plus and neat gel coat plus.
4. continuous lamination/casting operations	a. reduce total organic HAP emissions by at least 95 weight percent or b. not exceed an organic HAP emissions limit of 1.47 lbs of organic HAP per ton of neat resin plus and neat gel coat plus	total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 to this subpart and the calculation procedures specified in §§63.5865 through 63.5890, are reduced by at least 95 percent by weight total organic HAP emissions, based on the results of the capture efficiency and destruction efficiency testing specified in Table 6 and the calculation procedures specified in §§63.5865 through 63.5890, do not exceed 1.47 lbs of organic HAP of per ton of neat resin plus and neat gel coat plus.
5. pultrusion operations	a. reduce total organic HAP emissions by at least 60 percent by weight	i. total organic HAP emissions, based on the results of the capture efficiency and add-on control device destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 60 percent by weight, and/or ii. as part of the notification of initial compliance status, the owner/operator submits a certified statement that all pultrusion lines not controlled with an add-on control device, but for which an emission reduction is being claimed, are using direct die injection, and/or wet area enclosures that meet the criteria of §63.5830.
6. pultrusion operations	a. reduce total organic HAP emissions by at least 95 percent by weight	i. total organic HAP emissions, based on the results of the capture efficiency and add-on control device destruction efficiency testing specified in Table 6 to this subpart, are reduced by at least 95 percent by weight.

Table 9 to Subpart WWWW of Part 63—Initial Compliance With Work Practice Standards

As specified in §63.5860(a), you must demonstrate initial compliance with work practice standards as specified in the following table:

For...	That must meet the following standards...	You have demonstrated initial compliance if..
1. a new or existing closed molding operation using compression/injection molding	uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting	the owner or operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.
2. a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement	the owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.
3. a new or existing materials HAP containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety	the owner or operator submits a certified statement in the notice of compliance status that all HAP containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.
4. an existing or new SMC manufacturing operation	close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open	the owner or operator submits a certified statement in the notice of compliance status that the resin delivery system is closed or covered.
5. an existing or new SMC manufacturing operation	use a nylon containing film to enclose SMC	the owner or operator submits a certified statement in the notice of compliance status that a nylon containing film is used to enclose SMC.
6. an existing or new mixing or BMC manufacturing operation	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation	the owner or operator submits a certified statement in the notice of compliance status that mixer covers are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
7. an existing mixing or BMC manufacturing operation	not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials for safety	the owner or operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning except when adding materials or as necessary for safety.
8. a new or	keep the mixer covers closed during mixing except	the owner or operator submits a certified

existing mixing or BMC manufacturing operation	when adding materials to the mixing vessels	statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.
9. a new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement	<ul style="list-style-type: none">i. Not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s),ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device,iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s),iv. direct any compressed air exhausts away from resin and wet-out area(s),v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air,vi. clover all reservoirs, tanks, sumps, or HAP containing materials storage vessels except when they are being charged or filled, andvii. cover or shield from ambient air resin delivery systems to the wetout area(s) from reservoirs, tanks, or sumps where practical.	the owner or operator submits a certified statement in the notice of compliance status that they have complied with all the requirements listed in 9.i through 9.vii.

Table 13 to Subpart WWWW of Part 63—Applicability and Timing of Notifications

As required in §63.5905(a), you must determine the applicable notifications and submit them by the dates shown in the following table:

If your facility....	You must submit...	By this date...
1. Is an existing source subject to this subpart	An Initial Notification containing the information specified in §63.9(b)(2)	No later than the dates specified in §63.9(b)(2).
2. Is a new source subject to this subpart	The notifications specified in §63.9(b)(4) and (5)	No later than the dates specified §63.9(b)(4) and (5).
3. Qualifies for a compliance extension as specified in §63.9 (c)	A request for a compliance extension as specified in §63.9(c)	No later than the dates specified in §63.6(i).
4. Is complying with organic HAP emissions limit averaging provisions	A Notification of Compliance Status as specified in §63.9(h)	No later than 1 year plus 30 days after your facility's compliance date.
5. Is complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging	A Notification of Compliance Status as specified in §63.9(h)	No later than 30 calendar days after your facility's compliance date.
6. Is complying by using an add-on control device	a. A notification of intent to conduct a performance test as specified in §63.9(e)	No later than the date specified in §63.9(e).
	b. A notification of the date for the CMS performance evaluation as specified in §63.9(g)	The date of submission of notification of intent to conduct a performance test.
	c. A Notification of Compliance Status as specified in §63.9(h)	No later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

Table 14 to Subpart WWWW of Part 63—Requirements for Reports

As required in §63.5910(a), (b), (g), and (h), you must submit reports on the schedule shown in the following table:

You must submit a(n)..

1. Compliance report

The report must contain ..

a. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period

b. The information in §63.5910(d) if you have a deviation from any emission limitation (emission limit, operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in §63.8(c)(7), the report must contain the information in §63.5910(e)

c. The information in §63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan

a. Actions taken for the event

b. The information in §63.10(d)(5)(ii)

You must submit the report ...

Semiannually according to the requirements in §63.5910(b).

Semiannually according to the requirements in §63.5910(b).

Semiannually according to the requirements in §63.5910(b).

By fax or telephone within 2 working days after starting actions inconsistent with the plan.

By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority.(§63.10(d)(5)(ii)).

2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

Propane heaters (EP-05)

These units do not have any unit specific limitations because they will always be in compliance with 10 CSR 10-3.060 and are exempt from 10 CSR 10-6.260 and 10 CSR 10-6.400

Compliance demonstration for 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

EP#	Description	MHDR	Units	PM Emission Factor (lb/MMBtu)	PM Potential to Emit (lb/hr)	Emission Limit (lb/hr)
EP-05	Propane Heaters-total	0.01	1000 gallons/hr	0.0066	0.01	0.69
		1.16	MMBtu/hr			

Emission Factor Source: WebFIRE SCC 10500110

Heating value of Propane: 91.5 MMBtu/1000 gallon per AP42 Section 1.5

Spray Booths EP-01, EP-02, and EP-03

While particulate emissions are possible from these units, the quantity of these emissions cannot currently be evaluated. There are no emission factors available that quantify the release of particulate matter from the overspray from these operations. The installation uses panel filters on all of these booths to control particulates. 10 CSR 10-6.400 cannot be applied since there is no way to calculate the potential emissions. However, these units are being monitored for opacity under Permit Condition PW004. In this case, compliance with the opacity rule will also assure compliance with the process weight rule.

Belt Sander

These will always be in compliance with 10 CSR 6.400 because the uncontrolled potential emissions are less than the emissions limit established by the regulation, as shown below, using the emission factor provided in the Operating Permit application:

$$E = 4.1P^{0.67}$$

$$P = \left(5.6 \frac{\text{countertops}}{\text{hr}} \right) \left(146 \frac{\text{lbs}}{\text{countertop}} \right) \left(\frac{1 \text{ ton}}{2000 \text{ lbs}} \right) = 0.41 \frac{\text{tons}}{\text{hr}}$$

Emission limit=2.25 lb/hr

$$\text{Uncontrolled Potential to Emit PM} = \left(5.6 \frac{\text{countertop}}{\text{hr}} \right) \left(0.18 \frac{\text{lb PM}}{\text{countertop}} \right) = 1.01 \frac{\text{lb PM}}{\text{hr}}$$

1.01 < 2.25, therefore this unit is always in compliance.

Tumbler

These will always be in compliance with 10 CSR 6.400 because the uncontrolled potential emissions are less than the emissions limit established by the regulation, as shown below, using the emission factor provided in the Operating Permit application:

$$E = 4.1P^{0.67}$$

$$E = 4.1 * (0.25)^{0.67} = 1.61 \frac{\text{lb PM}}{\text{hr}}$$

$$\text{Uncontrolled Potential to Emit PM} = \left(0.25 \frac{\text{ton}}{\text{hr}}\right) \left(5 \frac{\text{lb PM}}{\text{ton}}\right) = 1.25 \frac{\text{lb PM}}{\text{hr}}$$

1.25 < 1.61, therefore this unit is always in compliance.

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

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

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