

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 012008-009 Project Number: 2007-08-072

Parent Company: Smart Office Advisors

Parent Company Address: 37 Elaine Drive, O'Fallon, MO 63366

Installation Name: Smart Office Advisors, Inc.

Installation Address: 61 North Central Drive, O'Fallon, MO 63366

Location Information: St. Charles County, S30, T47N, R3E

Installation of 3 surface coating paint booths, sawing equipment, and natural gas combustion units. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

JAN 24 2008

EFFECTIVE DATE

A handwritten signature in cursive script that reads "Steven J. Feller". Below the signature, the text "for JLC" is written in a smaller, less legible script.

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

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

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

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

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

STATE OF MISSOURI



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Permit No.	
Project No.	2007-08-072

SPECIAL CONDITIONS:

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

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

Smart Office Advisors, Inc.
St. Charles County, S30, T47N, R3E

1. Emission Limitation

- A. Smart Office Advisors, Inc. shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period. Equipment emitting HAPs consist of: 3 surface coating paint booths and thinner/cleaning.
- B. Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A). Smart Office Advisors, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in the paint booths (EP01) and thinner/cleaning (EP05).
- C. Smart Office Advisors, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(B) indicate that the source exceeds the limitation of Special Conditions Number 1(A).

2. Baghouse conditions

- A. Smart Office Advisors, Inc. shall control emissions from the Sawing (EP03) using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them. Replacement filters for the baghouses and drum filters shall be kept on hand at all times. The bags

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Project No.	2007-08-072

SPECIAL CONDITIONS:

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

shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

- B. Smart Office Advisors, Inc. shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - C. Smart Office Advisors, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. Operational Requirements
Smart Office Advisors, Inc. shall keep all paints solvents and cleaning solutions in sealed containers whenever the materials are not in use. Smart Office Advisors, Inc. shall provide and maintain suitable, easily read, permanent markings on all paints, solvents, and cleaning solution containers used with this equipment.
4. Control Device – Paint arrestors/filters
Paint arrestors/filters must be in use at all times when the paint booths (EP01) is in operation and shall be operated and maintained in accordance with the manufacturer's specifications.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2007-08-072
Installation ID Number: 183-0224
Permit Number:

Smart Office Advisors, Inc.
61 North Central Drive
O'Fallon, MO 63366

Complete: August 13, 2007

Parent Company:
Smart Office Advisors
37 Elaine Drive
O'Fallon, MO 63366

St. Charles County, S30, T47N, R3E

REVIEW SUMMARY

- Smart Office Advisors, Inc. has applied for authority to construct 3 surface coating paint booths, sawing equipment, and natural gas combustion units. The installation has also requested an amendment to the existing construction permit number 0495-008, issued to the previous owner of the equipment. The Air Pollution Control Program (in consultation with Smart Office Advisors) is issuing a new construction permit under Smart Office Advisors name rather than amending the existing permit. Permit 0495-008 is no longer valid. Installation voluntarily requested a 10/25 HAPs emission Limit.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are Xylene (CAS # 1330-20-7), Ethyl Benzene(CAS # 100-41-4), Toluene(CAS # 108-88-3) and Methanol(CAS # 67-56-1).
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations applies to the proposed equipment.
- Paint arrestors/filters are used to control the PM₁₀ emissions from the paint booths (EP01) and a Baghouse/dust collector is used to control the PM₁₀ emissions from the Sawing operation (EP03).
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential of VOC is above de minimis level but below major level.

- This installation is located in St. Charles County, a non-attainment area for Ozone.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential HAP emissions of the application are conditioned to below de minimis levels. Since potential VOC emissions are below major source levels no ambient air quality modeling is required. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- A Basic Operating Permit application is required for this installation within 30 days of permit issuance.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Smart Office Advisors took full ownership and control of K & R Wood Products, formerly Facility ID 183-0119. Smart Office Advisors submitted a new construction permit and requested to amend and supercede the existing construction permit # 0495-008 issued to K & R Wood Products. Smart Office Advisors replaced the sawing equipment operating by K & R and all the sanding equipment has been removed. In addition, Smart Office Advisors has voluntarily requested a 10/25 HAPs limit for the entire installation. A Basic operating permit is required for this installation, since VOC potential emission is less than major source level and above the de minimis source level. This permit was reviewed in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

PROJECT DESCRIPTION

This permit incorporates all of the equipment now at Smart Office Advisors. The operation consist of surface coating paint booths, sawing, gluing and cleaning. The building now includes the following equipment: Three binks paint spray booths (all previously permitted either by K&R or by Smart Office Advisor's 2005 permit project, #1, #2, & #3 on the plant layout); paint kitchen; Biesse/Polymac Model ERGHO edge bander, Original model 3576 radial arm saw, Lobo Model CS-1c shaper; Homag CNC Model CH-12-1008 panel saw,; Biesse 91802 Model 336 CNC heavy duty high speed router, 6000 CFM fan, Comac Model C2R1600 glue machine; the spray guns used in the paint booths are the same as permitted by K&R. Natural gas combustion units were all permitted by K&R and include an air make-up system, rated at 3.402 MMBtu/hr, 78 heaters, each rated at 0.25 MMBtu/hr, an office furnace, rated at 0.14 MMBtu/hr, and 2 water heaters, each rated at 0.1 MMBtu/hr. Paint arrestors/filters are used to control PM₁₀ emissions from paint over-spray. Baghouse/dust collector is used to control PM₁₀ emission from the Sawing Operation. Installation voluntarily requested 10/25 Tons Per Year (TPY) HAPs emission limits.

EMISSIONS/CONTROLS EVALUATION

The emissions of concern from this project are VOCs and HAPs. Potential HAPs of concern includes xylene, ethyl benzene, toluene, and methanol. The emission factors used in the VOCs and HAPs emissions analysis were developed from the MSDS submitted with the permit application and through the use of mass balanced around the process.

The emission factors and control efficiencies used in the combustion equipment analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, section 1.4, *Natural Gas Combustion* (3/98).

No EPA documents provide PM₁₀ emission factors for sawing. Searching in the State Of Missouri DNR, Permit number 2002-09-111, Project # 012003-002 was found to have a grinding operation which is very similar and close to the sawing operation. For purposes of this analysis, all particulate matter is assumed to be PM₁₀. Therefore, 0.077 lb per ton (lb/ton) of PM₁₀ emission factor that was used in that project will be used in this project.

PM₁₀ emissions are controlled through the use of a paint arrestors/filters that is expected to have at least 94.05 % control efficiency and by baghouse that is expected to have at least 98.98% control efficiency. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year).

The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions* (EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/A	N/A	1.13	N/A
SO _x	40.0	N/A	N/A	0.1	N/A
NO _x	40.0	N/A	N/A	2.41	N/A
VOC	40.0	N/A	<2.5	92.71	N/A
CO	100.0	N/A	N/A	2.02	N/A
HAPs	10.0/25.0	N/A	N/A	54.65	<25
Xylene	10.0	N/A	N/A	10.91	<10
Ethyl Benzene	10.0	N/A	N/A	1.36	N/A
Toluene	10.0	N/A	N/A	33.01	<10
Methanol	10.0	N/A	N/A	9.36	N/A

N/A = Not Applicable

*Existing emissions are not presented. The potential emissions of this application reflect the potential emissions of the entire installation.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential VOC is above de minimis level but below major level. Potential emissions of HAPs are conditioned to below major levels to avoid Section (9) review.

APPLICABLE REQUIREMENTS

Smart Office Advisors, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. Based on the EIQ that was submitted by Smart Office advisors, the actual VOC reported was 2.04 tons per year. If the actual VOC exceeds 2.5 tons per year in any calendar year then ***Control of Emission From Industrial Surface Coating Operations, 10 CSR 10-5.330*** becomes applicable and the company should comply with the rule requirements.

GENERAL REQUIREMENTS.

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

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*
- *Control of Emission From Industrial Surface Coating Operations, 10 CSR 10-5.330*

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Samer Al-Shoukhi
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 8, 2007, received August 13, 2007, designating Smart Office Advisors as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Material Safety Data Sheets (MSDS) was submitted with the permit application
- Saint Louis Regional Office Site Survey, dated August 27, 2007.

Ms. Joyce Benigno
Property and Office Manager
Smart Office Advisors, Inc.
61 North Central Drive
O'Fallon, MO, 63366

RE: New Source Review Permit - Project Number: 2007-08-072

Dear Ms. Benigno:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:sal

Enclosures

c: Saint Louis Regional Office Regional Office
PAMS File 2007-08-072

Permit Number: