

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

PERMIT BOOK

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:

042015-002

Project Number: 2014-10-011

Installation Number: 071-0151

Parent Company: Aerofil Technology, Inc.

Parent Company Address: 225 Industrial Drive, Sullivan, MO 63080

Installation Name: Aerofil Technology, Inc.

Installation Address: 225 Industrial Drive, Sullivan, MO 63080

Location Information: Franklin County, S5, T40N, R2W

Application for Authority to Construct was made for:

The installation of a new aerosol production line (Aerosol Line #7) and the correction of the existing potential to emit. This review was conducted in accordance with Section (5), 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.

APR 13 2015

EFFECTIVE DATE

Handwritten signature of Kya L Moore in black ink.

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 startup of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources' regional office responsible for the area within which you are located within 15 days after the actual startup of these air contaminant sources.

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 sources(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.

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Project No.	2014-10-011

**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."*

Aerofil Technology, Inc.  
Franklin County, S5, T40N, R2W

1. Superseding Condition
  - A. The conditions of this permit supersede the following special conditions found in the associated construction permits and their amendments previously issued by the Air Pollution Control Program.
    - 1) Construction Permit 0996-002B
      - a) Special Condition 3
    - 2) Construction Permit 042012-004
      - a) Special Condition 2.B and 2.C
2. VOC Emission Limitation
  - A. Aerofil Technology, Inc. shall emit less than 40.0 tons of VOCs in any consecutive 12-month period from the following emission points:
    - 1) EP-25A(1) Material Loading into Mixing Tanks
    - 2) EP-25A(2) Mixing Emissions
    - 3) EP-25A(3) Dry Blending into Liquid Solution
    - 4) EP-25B Finished Product Loading into Containers
    - 5) EP-25C Fugitive Equipment Leaks
    - 6) EP-25D Propellant Filling Aerosol Cans
    - 7) EP-25E Fugitive Propellant Leaks
  - B. Aerofil Technology, Inc. shall develop and use forms to demonstrate compliance with Special Condition 2.A. The forms shall contain a minimum of the following information:
    - 1) Installation Name
    - 2) Installation ID
    - 3) Permit Number
    - 4) Current Month
    - 5) Current 12-Month Date Range
    - 6) Emission Points Listed in Special Condition 2.A.
    - 7) Emission Point Respective Current Month Throughput
    - 8) Emission Factor for Each Emission Point\*

\*Emission factors shall be taken from the sources indicated in the Emissions/Controls Evaluation section of this permit and the project calculation spreadsheets.

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**SPECIAL CONDITIONS:**

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

- 9) Monthly Emissions for Each Emission Point
- 10) Monthly Emissions for VOCs
- 11) 12-Month Rolling Total for VOCs
- 12) Indication of Compliance with Special Condition 2.A

**3. Particulate Emission Limitation**

- A. Aerofil Technology, Inc. shall emit less than 25.0 tons of PM, 15.0 tons of PM<sub>10</sub>, and 10.0 tons of PM<sub>2.5</sub> in any consecutive 12-month period from the emission points listed in Table 1.

**Table 1. Construction Permit 0996-002 Equipment List**

Emission Point	Description	Emission Point	Description
EP-01A	Hexane Storage Tank	EP-08A	Transfer of VOC to Mix Tanks
EP-01B	Isopropyl Alcohol Storage Tank	EP-08B	Mixing Operations for Malathion
EP-02A	Transfer of VOC into Mix Tanks	EP-08C	VOC Mixing
EP-02B	Transfer of HAP into Mix Tanks	EP-08D <sup>a</sup>	Blending Dry Products into Liquid
EP-02C	VOC Mixing	EP-09	Transfer of VOC to Product Containers
EP-02D	HAP Mixing	EP-10A	Dry Blending and Packaging
EP-02E <sup>a</sup>	Blending Dry Products into Liquid	EP-10B	Liquid Spraying of Dursban
EP-03A	Transfer of VOC into Product Containers	EP-10C	Liquid Spraying in Dry Production Area
EP-03B	Transfer of HAP into Product Containers	EP-11A	VOC Distillation Unit
EP-04	Quality Control Spraying	EP-11B	HAP Distillation Unit
EP-05	External Combustion Boiler	EP-12	Cold Solvent Parts Cleaning Unit
EP-06	Silkscreening	EP-13	Ink Jet Coating
EP-07A	Xylene Storage Tank	EP-14	Aerosol Can Rework
EP-07B	Isopropyl Alcohol Storage Tank	EP-15	External Combustion Boiler

<sup>a</sup>Includes the updated maximum design rate of 8,000 lb/hr each

- B. Aerofil Technology, Inc. shall emit less than 25.0 tons of PM, 15.0 tons of PM<sub>10</sub>, and 10.0 tons of PM<sub>2.5</sub> in any consecutive 12-month period from the following emission points:

- 1) EP-25A(1) Material Loading into Mixing Tanks
- 2) EP-25A(2) Mixing Emissions
- 3) EP-25A(3) Dry Blending into Liquid Solution
- 4) EP-25B Finished Product Loading into Containers
- 5) EP-25C Fugitive Equipment Leaks
- 6) EP-25D Propellant Filling Aerosol Cans
- 7) EP-25E Fugitive Propellant Leaks
- 8) EP-HR2 New Haul Roads

- C. Aerofil Technology, Inc. shall develop and use forms to demonstrate compliance with Special Conditions 4.A and 4.B. The forms shall contain a minimum of the following information:

\*Emission factors shall be taken from the sources indicated in the Emissions/Controls Evaluation section of this permit and the project calculation spreadsheets.

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## SPECIAL CONDITIONS:

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

- 1) Installation Name
  - 2) Installation ID
  - 3) Permit Number
  - 4) Current Month
  - 5) Current 12-Month Date Range
  - 6) Emission Points Listed in Special Conditions 4.A and 4.B
  - 7) Emission Point Respective Current Month Throughput
  - 8) Emission Factor for Each Emission Point\*
  - 9) Monthly Emissions for Each Emission Point
  - 10) Monthly Emissions for PM, PM<sub>10</sub>, and PM<sub>2.5</sub>
  - 11) 12-Month Rolling Total for PM, PM<sub>10</sub>, and PM<sub>2.5</sub>
  - 12) Indication of Compliance with Special Conditions 4.A and 4.B.
4. HAP Emission Limitation
- A. Aerofil Technology, Inc. shall emit less than the Screening Model Action Level (SMAL) or less than 10.0 tons of each individual HAP (whichever is smaller) in any consecutive 12-month period from the entire installation. Appendix B lists the SMAL for each HAP.
  - B. Aerofil Technology, Inc. shall emit less than 25.0 tons of combined HAPs in any consecutive 12-month period from the entire installation.
  - C. Aerofil Technology, Inc. shall develop and use forms to demonstrate compliance with Special Conditions 3.A and 3.B. The forms shall contain a minimum of the following information:
    - 1) Installation Name
    - 2) Installation ID
    - 3) Permit Number
    - 4) Current Month
    - 5) Current 12-Month Date Range
    - 6) All Emission Points
    - 7) Emission Point Respective Current Month Throughput
    - 8) Emission Factor for Each Emission Point\*
    - 9) Monthly Emissions for Each Emission Point
    - 10) Monthly Emissions for Individual and Combined HAPs
    - 11) 12-Month Rolling Total for Individual and Combined HAPs
    - 12) Indication of Compliance with Special Conditions 3.A and 3.B
5. Haul Road Paving Requirement
- A. Aerofil Technology, Inc. shall pave all previously unpaved haul roads at the facility before beginning operation of Aerosol Line #7.

\*Emission factors shall be taken from the sources indicated in the Emissions/Controls Evaluation section of this permit and the project calculation spreadsheets.

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**SPECIAL CONDITIONS:**

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

- B. Aerofil Technology, Inc. shall pave these haul roads with asphalt, concrete or other materials approved by the Air Pollution Control Program. The pavement will be applied in accordance with industry standards to achieve control of fugitive emissions while the plant is operating.
  - C. Maintenance and repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
  - D. Aerofil Technology, Inc. shall periodically wash or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
6. Record Keeping and Reporting Requirements
- A. Aerofil Technology, Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
  - B. Aerofil Technology, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2014-10-011  
Installation ID Number: 071-0151  
Permit Number:

Aerofil Technology, Inc.  
225 Industrial Drive  
Sullivan, MO 63080

Complete: October 8, 2014

Parent Company:  
Aerofil Technology, Inc.  
225 Industrial Drive  
Sullivan, MO 63080  
Franklin County, S5, T40N, R2W

REVIEW SUMMARY

- Aerofil Technology, Inc. has applied for authority to install a new aerosol production line (Aerosol Line #7) and correct the existing potential to emit.
- HAP emissions are expected from the proposed equipment. Specific HAPs of concern were not listed in the application, because the variability of materials used depends on client demand and HAP content variability; however, all HAPs will be individually limited to their respective SMALs or 10.0 tons per year (whichever is smaller) and will also be limited to a combined 25.0 tons per year, as per the special conditions of this permit.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential particulate and VOC emissions are conditioned below de minimis levels for this project, and potential HAP emissions are conditioned below de minimis levels for the installation.
- This installation is located in Franklin County, a nonattainment area for the 8-hour ozone standard and the PM<sub>2.5</sub> standard and an attainment area for all other criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

- Emissions testing is not required for the equipment.
- An amendment to your Part 70 Operating Permit is required for this installation within 1 year of the issuance date of this permit.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

Aerofil Technology, Inc. (ATI) operates a contract packaging facility in Franklin County. Materials are received by truck in bulk or in drums and then mixed and repackaged according to customer specifications. Most of the products are consumer commodities that can be found in retail stores. A variety VOCs and HAPs are used in the production process including, but not limited to: hexane, isopropyl alcohol, methanol, xylene, trimethylpentane, methylene chloride, naphthalene and perchloroethylene. ATI has two (2) production departments: aerosol and liquid. ATI produced dry products in the past but ceased this operation in 2010. ATI is currently considered a major source for construction permits and operates under a Part 70 operating permit. ATI's last operating permit (OP2005-027) was issued in October of 2005, and an operating permit renewal is currently undergoing technical review.

The following New Source Review permits have been issued to Aerofil Technology, Inc. from the Air Pollution Control Program:

Table 2: Permit History

Permit Number	Description
0996-002	Construction permit for liquid and dry aerosol packaging plant
0996-002A	Amendment to construction permit – additional HAP
0996-002B	Amendment to construction permit – additional HAP
1199-016	Construction permit for dry product filling line.
082000-002	Construction permit for two (2) aerosol production lines
082000-002A	Amendment to Special Conditions
122002-015	Construction permit for 20 organic liquid storage tanks and 4 dry product silos
052006-009	Construction permit for new production line
042012-004	Construction permit for new liquid formation line

## PROJECT DESCRIPTION

ATI is proposing to install a new aerosol production line (Aerosol Line #7). Aerosol Line #7 will consist of a new filling line rated at 300 cans per minute, capable of filling cans ranging in size from 8 ounces to 24 ounces. The line will include up to five new mixing tanks, four filler cabinets, two gas house cabinets, two propellant storage tanks, and a conveying system. The tanks will have a maximum capacity of 9,000 gallons each. The overall maximum hourly design rate of Aerosol Line #7 will be 3,375 gallons of product per hour.

Emissions from haul roads were previously never included in emissions calculations for the facility. With the installation of this new production line, the haul road emissions will be added to the facility's potential and updated to reflect the new traffic patterns brought about by the addition of Aerosol Line #7. Also, the maximum design rates of existing mixing tanks EP-02E, EP-08D, EP-22D, and EP-23C will be updated to 8,000 lb/hr to reflect the proper potential throughputs, which were misrepresented in previous construction permits.

## EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Fifth Edition (AP-42).

Potential VOC and HAP emissions were calculated assuming worst case scenario, which occurs when a 100% VOC and 100% HAP material (e.g. pure hexane) is exclusively used on the filling line. Actual emissions and specific VOC/ HAP contents cannot be accurately predicted due to the variability of the materials used, which are dependent on client demand and the variability of material content. However, based on the facility's past EIQ and that the new filling line will use mostly water-based materials, emissions are expected to be less than de minimis for VOCs and HAPs. Therefore, project VOC emissions and installation-wide HAP emissions are limited to below de minimis levels.

Potential VOC emissions from loading material into the mixing tanks as well as final product packaging line were calculated using the loading loss equation 8.4-1, as presented in the Emission Inventory Improvement Program (EIIP), Volume II, Chapter 8, *Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities* (February 2005).

Potential VOC emissions from the heating caused by mixing were calculated using EIIP, Volume II, Chapter 16, *Methods for Estimating Air Emissions from Chemical Manufacturing Facilities*, Section 3.6 (August 2007).

Potential VOC emissions from fugitive equipment leaks were calculated using emission factors obtained from the Texas Commission on Environmental Quality document *Addendum to RG-360A* (January 2008), which further referenced EPA document *EPA-453/R-95-017* (November 1995).

The emission factors used to calculate particulate matter emissions from the dry product blending in the mix tanks were obtained from Table 6.7-1 found in AP-42, Section 6.7, *Printing Ink* (May 1983). The particle size distribution for PM<sub>10</sub> and PM<sub>2.5</sub> was based on the values listed in AP-42 Appendix B.2, Category 4. A control efficiency of 3.7% for particulates was given to each dry product mix tank for being enclosed in a building.

Potential VOC emissions from can gassing were calculated assuming that a small amount of propellant (0.25 cc) in the fill tube is released, and the average propellant weight is 0.59 grams per cc.

Potential VOC emissions from quality control spraying were calculated assuming 2 cans per line per hour are selected for quality control over a 24 hour period for a maximum of 21 days per year. A factor of safety of four was applied to this calculation, as well. The calculations were based on 0.36 lb VOC per can, assuming an average of 3 oz VOC per can plus 80 grams of propellant per can.

Emissions from haul roads were calculated using the predictive equation from AP-42 Section 13.2.1 *Paved Roads*, January 2011.

The following table provides an emissions summary for this project. Existing potential emissions were taken from the previous construction permit 042012-004. Existing actual emissions were taken from the installation's 2013 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year).

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions <sup>a</sup>	Existing Actual Emissions <sup>b</sup> (2013 EIQ)	Potential Emissions of the Application <sup>c</sup>	Conditioned Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/D	N/D	175.21	<25.0	N/D
PM <sub>10</sub>	15.0	32.37	3.63	144.71	<15.0	47.37
PM <sub>2.5</sub>	10.0	N/D	1.44	50.93	<10.0	N/D
SO <sub>x</sub>	40.0	N/D	0.01	N/A	N/A	N/A
NO <sub>x</sub>	40.0	N/D	2.28	N/A	N/A	N/A
VOCs	40.0	210.7	25.46	92.21	<40.0	250.7
CO	100.0	N/D	0.45	N/A	N/A	N/A
HAPs	10.0 / 25.0	<10.0 / 25.0	0.49	66.53	<10.0 / 25.0 <sup>d</sup>	<10.0 / 25.0 <sup>d</sup>

N/A = Not Applicable; N/D = Not Determined

<sup>a</sup>Existing Potential Emissions do not account for haul roads or updated mixing tank design rates

<sup>b</sup>Existing Actual Emissions do not include haul roads

<sup>c</sup>Potential Emissions include new haul roads and Aerosol Line #7 emissions

<sup>d</sup>This is an installation-wide limit. Refer to Appendix B for individual HAP limits based on SMAL.

### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential particulate and VOC emissions are conditioned below de minimis levels for this project, and potential HAP emissions are conditioned below de minimis levels for the installation.

## APPLICABLE REQUIREMENTS

Aerofil Technology, 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *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 10-6.165

### SPECIFIC REQUIREMENTS

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

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

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Ryan Schott  
New Source Review Unit

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Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 30, 2014, received October 2, 2014, designating Aerofil Technology, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....	percent	<b>m/s</b> .....	meters per second
<b>°F</b> .....	degrees Fahrenheit	<b>Mgal</b> .....	1,000 gallons
<b>acfm</b> .....	actual cubic feet per minute	<b>MW</b> .....	megawatt
<b>BACT</b> .....	Best Available Control Technology	<b>MHDR</b> .....	maximum hourly design rate
<b>BMPs</b> .....	Best Management Practices	<b>MMBtu</b> ....	Million British thermal units
<b>Btu</b> .....	British thermal unit	<b>MMCF</b> .....	million cubic feet
<b>CAM</b> .....	Compliance Assurance Monitoring	<b>MSDS</b> .....	Material Safety Data Sheet
<b>CAS</b> .....	Chemical Abstracts Service	<b>NAAQS</b> ...	National Ambient Air Quality Standards
<b>CEMS</b> .....	Continuous Emission Monitor System	<b>NESHAPs</b>	National Emissions Standards for Hazardous Air Pollutants
<b>CFR</b> .....	Code of Federal Regulations	<b>NO<sub>x</sub></b> .....	nitrogen oxides
<b>CO</b> .....	carbon monoxide	<b>NSPS</b> .....	New Source Performance Standards
<b>CO<sub>2</sub></b> .....	carbon dioxide	<b>NSR</b> .....	New Source Review
<b>CO<sub>2e</sub></b> .....	carbon dioxide equivalent	<b>PM</b> .....	particulate matter
<b>COMS</b> .....	Continuous Opacity Monitoring System	<b>PM<sub>2.5</sub></b> .....	particulate matter less than 2.5 microns in aerodynamic diameter
<b>CSR</b> .....	Code of State Regulations	<b>PM<sub>10</sub></b> .....	particulate matter less than 10 microns in aerodynamic diameter
<b>dscf</b> .....	dry standard cubic feet	<b>ppm</b> .....	parts per million
<b>EQ</b> .....	Emission Inventory Questionnaire	<b>PSD</b> .....	Prevention of Significant Deterioration
<b>EP</b> .....	Emission Point	<b>PTE</b> .....	potential to emit
<b>EPA</b> .....	Environmental Protection Agency	<b>RACT</b> .....	Reasonable Available Control Technology
<b>EU</b> .....	Emission Unit	<b>RAL</b> .....	Risk Assessment Level
<b>fps</b> .....	feet per second	<b>SCC</b> .....	Source Classification Code
<b>ft</b> .....	feet	<b>scfm</b> .....	standard cubic feet per minute
<b>GACT</b> .....	Generally Available Control Technology	<b>SDS</b> .....	Safety Data Sheet
<b>GHG</b> .....	Greenhouse Gas	<b>SIC</b> .....	Standard Industrial Classification
<b>gpm</b> .....	gallons per minute	<b>SIP</b> .....	State Implementation Plan
<b>gr</b> .....	grains	<b>SMAL</b> .....	Screening Model Action Levels
<b>GWP</b> .....	Global Warming Potential	<b>SO<sub>x</sub></b> .....	sulfur oxides
<b>HAP</b> .....	Hazardous Air Pollutant	<b>SO<sub>2</sub></b> .....	sulfur dioxide
<b>hr</b> .....	hour	<b>tph</b> .....	tons per hour
<b>hp</b> .....	horsepower	<b>tpy</b> .....	tons per year
<b>lb</b> .....	pound	<b>VMT</b> .....	vehicle miles traveled
<b>lbs/hr</b> .....	pounds per hour	<b>VOC</b> .....	Volatile Organic Compound
<b>MACT</b> .....	Maximum Achievable Control Technology		
<b>µg/m<sup>3</sup></b> .....	micrograms per cubic meter		

Mr. Jody McCall  
Environmental Engineer  
Aerofil Technology, Inc.  
225 Industrial Drive  
Sullivan, MO 63080

RE: New Source Review Permit - Project Number: 2014-10-011

Dear Mr. McCall:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. "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.

This permit consolidates projects 2014-06-010, 2014-06-011, and 2014-10-011. Since all three applications were submitted within the same review period, it was easier to encompass all additions and updates in one permit. This permit supersedes the relevant special conditions in issued construction permits 0996-002 and 042012-004 and updates the affected emissions. This includes incorporating haul road emissions, which were previously unaccounted for, correcting the maximum design rates of the 4 dry product blending units (EP-02E, EP-08D, EP-22D, and EP-23C) to 8,000 lbs/hr, and reestablishing the installation-wide de minimis HAP limit.

If you were adversely affected by this decision, you may be entitled to pursue an appeal before the hearing commission pursuant to Sections 621.250 and 643.075.6 of RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; it will be deemed filed on the date it is received by the administrative hearing commission, Administrative Hearing Commission, Truman State Office Building, P.O. Box 1557, Jefferson City, MO 65102, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions contact Ryan Schott, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:rs1

Enclosures

c: St. Louis Regional Office  
PAMS File: 2014-10-011  
Permit Number: