

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

Ms. Cassie Branch
Aluminum Finishers, LLC
P.O. Box 518
Monett, MO 65708

AUG 28 2019

Re: Part 70 Operating Permit Renewal
Installation ID: 145-0063, Permit Number: OP2019-032

Dear Ms. Branch:

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

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jjj

Enclosures

c: PAMS File: 2018-05-008



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PART 70 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 herein.

Operating Permit Number: OP2019-032
Expiration Date: **AUG 28 2024**
Installation ID: 145-0063
Project Number: 2018-05-008

Installation Name and Address

Aluminum Finishers, LLC
289 East Cedar Street
Granby, MO 64844

Parent Company's Name and Address

Architectural Systems, Inc.
P.O. Box 518
Monett, MO 65708

Installation Description:

Aluminum Finishers, LLC manufactures prefabricated metal storefronts in Granby, Missouri. The installation finishes purchased aluminum by either wet painting or powder coating. The installation is a major source of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

AUG 28 2019

Effective Date

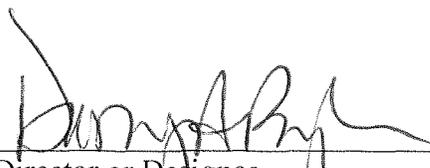

Director or Designee
Department of Natural Resources

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description
EU-01	Eight-station Paint Booth (12.57 Gal) (2010)
EU-02	Drying Oven (0.003 MMScf) (Natural Gas) (2010)
EU-03	Paved Haul Road – 0.1 miles
EU-04	Annealing Oven (2 MMBtu) (Natural Gas) (2010)
EU-05	(5) Process Heaters (0.25 MMBtu each) (Natural Gas) (2010)

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Unit	Description
-	Nine 8,127 gallon aluminum pre-treatment tanks

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

<p style="text-align: center;">PERMIT CONDITION 102010-001 VOC 10 CSR 10-6.060 Construction Permits Required Construction Permit 102010-001, Issued October 5, 2010</p>
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Emission Limitation

The permittee shall emit less than 250.0 tons of VOCs from the entire installation in any consecutive 12-month period. [Special Condition 1.A.]

Recordkeeping and Reporting

- 1) Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A. The permittee 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 Safety Data Sheets (SDS) for all materials used. [Special Condition 1.B.]
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, 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. [Special Condition 1.C.]
- 3) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [§70.6(a)(3)(iii)]

PERMIT CONDITION 102010-001 PM

10 CSR 10-6.060 Construction Permits Required
Construction Permit 102010-001, Issued October 5, 2010

Emission Limitation

The permittee shall emit less than 15.0 tons of Particulate Matter less than 10 microns in diameter from the entire installation in any consecutive 12-month period. [Special Condition 2.A.]

Recordkeeping and Reporting

- 1) Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A. The permittee 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. [Special Condition 2.B.]
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which the records from Special Condition 2.B. indicate that the source exceeds the limitation of Special Condition 2.A. [Special Condition 2.C.]

PERMIT CONDITION 102010-001 THINNERS, PAINTS, AND SOLVENTS

10 CSR 10-6.060 Construction Permits Required
Construction Permit 102010-001, Issued October 5, 2010

Operational Limitation

The permittee shall keep the thinners, paints, 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 thinners, paints, solvents, and cleaning solution containers used with this equipment. [Special Condition 4.]

Reporting

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [§70.6(a)(3)(iii)]

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 102010-001 POWDER COAT	
10 CSR 10-6.060 Construction Permits Required Construction Permit 102010-001, Issued October 5, 2010	
Emission Unit	Description
EU-01	Eight-station Paint Booth (12.57 Gal) (2010)

Operational Limitation

- 1) The permittee shall control emissions from EP-01 Eight-station Paint Booth using a paint arrestor filter. The paint arrestor filter shall be operated and maintained in accordance with the manufacturer's specifications. The filter shall be equipped with a gauge or meter, which indicates the pressure drop across the filter. The gauge or meter shall be located such that Department of Natural Resources' employees may easily observe them. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 3.A.]

Recordkeeping and Reporting

- 1) The permittee shall monitor and record the operating pressure drop across the filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 3.B.]
- 2) The permittee shall maintain a copy of the manufacturer's performance warranty indicating the operating pressure drop design conditions onsite.
- 3) The permittee shall maintain an operating and maintenance log for the filters which shall include the following: [Special Condition 3.C.]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 4) The permittee shall maintain all records required by this permit for not less than five years and shall make them available to Missouri Department of Natural Resources' personnel upon request. [§70.6(a)(3)(iii)]
- 5) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [§70.6(a)(3)(iii)]

PERMIT CONDITION 102010-001 HAUL ROAD

10 CSR 10-6.060 Construction Permits Required
 Construction Permit 102010-001, Issued October 5, 2010

Emission Unit	Description
EU-03	Paved Haul Road – 0.1 miles

Operational Limitation

- 1) The permittee shall control fugitive emissions from 0.1 miles of haul road at this site by paving and washing/cleaning. [Special Condition 5]
 - a) The permittee shall pave with materials such as asphalt, concrete, and/or other material(s). If materials other than asphalt or concrete are used, the permittee must receive approval from the Air Pollution Control Program. The pavement shall be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating. [Special Condition 5.A.]
 - b) Maintenance and/or repair of the road surface shall be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas. [Special Condition 5.B.]

Reporting

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [§70.6(a)(3)(iii)]

PERMIT CONDITION 6.220

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

Emission Unit	Description
EU-01	Eight-station Paint Booth (12.57 Gal) (2010)

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
- 2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 40 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
- 3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

- 1) Monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
 - i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
 - ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
- 2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
- 3) Observations are only required when the emission units are operating and when the weather conditions allow.
- 4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
- 5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
- 6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Record Keeping:

- 1) The permittee shall maintain records of all observation results for each emission unit using Attachments C and D or equivalent forms.
- 2) The permittee shall make these records available within a reasonable period of time for inspection to the Department of Natural Resources' personnel upon request.
- 3) The permittee shall retain all records for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 6.261	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EU-02	Drying Oven (0.003 MMScf) (Natural Gas) (2010)
EU-04	Annealing Oven (2 MMBtu) (Natural Gas) (2010)
EU-05	(5) Process Heaters (0.25 MMBtu) (Natural Gas) (2010)

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement¹

Recordkeeping:

- 1) The permittee shall determine compliance using fuel delivery records.
- 2) The permittee must maintain a record of fuel deliveries.
- 3) The permittee must maintain the fuel supplier information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
 - a) The name, address, and contact information of the fuel supplier;
 - b) The type of fuel;
 - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
 - d) The heating value of the fuel.
- 4) The permittee must furnish the director all data necessary to determine compliance status.
- 5) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
- 6) All records must be kept for a minimum of 5 years and be made available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification, as required by Section V of this permit.
- 2) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

¹ Missouri's SIP has not adopted this regulation; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement.

PERMIT CONDITION MACT MMMM

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart MMMM – National Emission Standards for HAP for Surface Coating of
Miscellaneous Metal Parts and Products

Emission Unit	Description (ignition type)
EU-01	Eight-station Paint Booth (12.57 Gal) (2010)

Emission Limitation

- 1) The permittee shall limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in §63.3890(a)(1) through (5) except as specified in §63.3890(c), determined according to the requirements in §63.3941, §63.3951, or §63.3961. [§63.3890(a)]
 - a) For each new high performance coating affected source, limit organic HAP emissions from the Eight-Station Paint Booth (EU-01) to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period. [§63.3890(a)(2)]

Compliance Options

- 1) The permittee shall include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the Eight Station Paint Booth (EU-01) when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.3890. To make this determination, the permittee must use at least one of the three compliance options listed in §63.3891(a) through (c). The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by §63.3930(c), and the permittee must report it in the next semiannual compliance report required in §63.3920. [§63.3891]
 - a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the Eight Station Paint Booth (EU-01) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee shall meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option. [§63.3891(a)]
 - b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the Eight Station Paint Booth (EU-01), the organic HAP emission rate for the Eight Station Paint Booth (EU-01) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee shall meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. [§63.3891(b)]
 - c) *Emission rate with add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the Eight Station Paint Booth (EU-01), and the emissions reductions achieved by emission capture systems and add-on controls, the organic

HAP emission rate for the Eight Station Paint Booth (EU-01) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. If the permittee uses this compliance option, the permittee shall also demonstrate that all emission capture systems and add-on control devices for the Eight Station Paint Booth (EU-01) meet the operating limits required in §63.3892, except for solvent recovery systems for which the permittee conduct liquid-liquid material balances according to §63.3961(j), and that the permittee meets the work practice standards required in §63.3893. The permittee shall meet all the requirements of §§63.3960 through 63.3968 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option. [§63.3891(c)]

Compliant Material Option

Operating Limitations

For any coating operation(s) on which the permittee uses the compliant material option, the permittee is not required to meet any operating limits. [§63.3892(a)]

Work Standards

For any coating operation(s) on which the permittee uses the compliant material option, the permittee is not required to meet any work practice standards. [§63.3893(a)]

General Compliance

- 1) The permittee must be in compliance with the emission limitations in MACT MMMM as specified in §63.3900(a)(1) and (2). [§63.3900(a)]
 - a) Any coating operation(s) for which the permittee uses the compliant material option, as specified in §63.3891(a) and (b), must be in compliance with the applicable emission limit in §63.3890 at all times. [§63.3900(a)(1)]
- 2) The permittee shall always operate and maintain their affected source, including all air pollution control and monitoring equipment the permittee uses for purposes of complying with MACT MMMM, according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]

General Provisions

The permittee shall comply with the applicable General Provisions as specified in table 2 of MACT MMMM [§63.3901]

Reporting

- 1) The permittee shall submit semiannual compliance reports as specified in a) through e) below. [§63.3920(a)]
 - a) *Dates.* Unless the Director has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee shall prepare and submit each semiannual compliance report according to the dates specified §63.3920(a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(1)]
 - i) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [§63.3920(a)(1)(ii)]

- ii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [§63.3920(a)(1)(iii)]
- iii) The permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in §63.3920(a)(1)(iii). [§63.3920(a)(1)(iv)]
- b) *Inclusion with title V report.* The permittee shall report all deviations as defined in MACT MMMM in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to §63.3920 along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in MACT MMMM, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]
- c) *General requirements.* The semiannual compliance report must contain the information specified in §63.3920(a)(3)(i) through (vii), and the information specified in §63.3920(a)(4) through (7) and (c)(1) that is applicable. [§63.3920(a)(3)]
 - i) Company name and address. [§63.3920(a)(3)(i)]
 - ii) 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. [§63.3920(a)(3)(ii)]
 - iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30 or December 31. Note that the information reported for each of the six months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
 - iv) Identification of the compliance option or options specified in §63.3891 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates for each option the permittee used. [§63.3920(a)(3)(iv)]
 - v) If the permittee used the predominant activity alternative (§63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semiannual compliance report. [§63.3920(a)(3)(vi)]
 - vi) If the permittee used the facility-specific emission limit alternative (§63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the six-month reporting period. [§63.3920(a)(3)(vii)]
- d) *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- e) *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semiannual compliance report must contain the information in §63.3920(a)(5)(i) through (iv). [§63.3920(a)(5)]
 - i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [§63.3920(a)(5)(i)]
 - ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. The permittee does not need to submit

- background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports). [§63.3920(a)(5)(ii)]
- iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports). [§63.3920(a)(5)(iii)]
 - iv) A statement of the cause of each deviation. [§63.3920(a)(5)(iv)]

Recordkeeping

- 1) The permittee shall collect and keep records of the data and information specified in 2) through 12) below,
- 2) A copy of each notification and report that the permittee submitted to comply, and the documentation supporting each notification and report. If the permittee is using the predominant activity alternative under §63.3890(c), the permittee must keep records of the data and calculations used to determine the predominant activity. If the permittee is using the facility-specific emission limit alternative under §63.3890(c), the permittee must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. The permittee must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports. [§63.3930(a)]
- 3) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If permittee uses information provided to the permittee by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided to the permittee by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
- 4) For each compliance period, the records specified in §63.3930(c)(1) through (4). [§63.3930(c)]
 - a) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used. [§63.3930(c)(1)]
 - b) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941. [§63.3930(c)(1)]
- 5) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
- 6) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
- 7) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
- 8) If the permittee uses an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF)

according to §63.3951(e)(4), the permittee must keep records of the information specified §63.3930(h)(1) through (3). [§63.3930(h)]

- a) The name and address of each TSDF to which the permittee sent waste materials for which the permittee use an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.3930(h)(1)]
- b) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.3951. [§63.3930(h)(2)]
- c) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.3930(h)(3)]
- 9) The permittee shall keep records of the date, time, and duration of each deviation. [§63.3930(j)]
- 10) The permittee's records shall be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
- 11) 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. [§63.3931(b)]
- 12) The permittee must keep each record on-site 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 may keep the records off-site for the remaining 3 years. [§63.3931(c)]

Compliance Demonstration Requirements

- 1) For each compliance period to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. If the permittee is complying with a facility-specific emission limit under §63.3890(c), the permittee shall also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation. [§63.3942(a)]
- 2) If the permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in §63.3942(a) is a deviation from the emission limitations that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5). [§63.3942(b)]
- 3) As part of each semiannual compliance report required by §63.3920, the permittee shall identify the coating operation(s) for which the compliant material option was used. If there were no deviations from the applicable emission limit in §63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and the permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a). [§63.3952(c)]
- 4) The permittee shall maintain records as specified in §§63.3930 and 63.3931. [§63.3952(d)]

PERMIT CONDITION MACT DDDDD²	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	
Emission Unit	Description
EU-05	(5) 0.25 MMBtu Process Heaters, Natural Gas

Emission Limitations

The permittee is not subject to any emission limitations under this regulation. [§63.7500(e)]

Operating Limitations

- 1) The permittee shall meet the requirements in §63.7500(a)(1) through (3), except as provided in §63.7500(b) through (e). The permittee shall meet these requirements at all times the affected unit is operating, except as provided in §63.7500(f). [§63.7500(a)]
 - a. The permittee shall meet each work practice standard in Table 3 to MACT DDDDD that applies, for each process heater, except as provided under §63.7522. [§63.7500(a)(1)]
 - i. At all times, the permittee must operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.7500(a)(3)]
 - ii. As provided in §63.6(g), EPA may approve use of an alternative to the work practice standards §63.7500. [§63.7500(b)]
 - iii. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to five million Btu per hour must complete a tune-up every 5 years as specified in §63.7540. [§63.7500(e)]

General Requirements

The permittee shall be in compliance with the work practice standards in MACT DDDDD. [§63.7505]

Tune-Up Requirements

- 1) Each five-year tune-up specified in §63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up. [§63.7515(d)]
- 2) The permittee must conduct a tune-up of the boiler or process heater every five years as specified in §63.7540(a)(10)(i) through (vi) to demonstrate continuous compliance. The permittee may delay the burner inspection specified in §63.7540(a)(10)(i) until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. [§63.7540(a)(12)]

² The permittee completely replaces the process heaters on a yearly basis and thus is not subject to the five year tune-up requirements of MACT DDDDD. If the permittee should decide to keep the process heaters for a period of five years or greater, the permittee will be subject to the five year tune-up requirements of this permit condition.

- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; [§63.7540(a)(10)(i)]
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available; [§63.7540(a)(10)(ii)]
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection; [§63.7540(a)(10)(iii)]
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject; [§63.7540(a)(10)(iv)]
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and [§63.7540(a)(10)(v)]
 - f. Maintain on-site and submit, if requested by the Director, a report containing the information in §63.7540(a)(10)(vi)(A) through (C), [§63.7540(a)(10)(vi)]
 - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; [§63.7540(a)(10)(vi)(A)]
 - ii. A description of any corrective actions taken as a part of the tune-up; and [§63.7540(a)(10)(vi)(B)]
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. [§63.7540(a)(10)(vi)(C)]
- 3) If the unit is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 calendar days of startup. [§63.7540(a)(13)]

Recordkeeping and Reporting

- 1) The permittee must comply with this subpart no later than January 31, 2016, except as provided in §63.6(i). [§63.7495(b)]
- 2) The permittee must submit the report in Table 9 to MACT DDDDD. [§63.7550(a)]

Table 9 to Subpart DDDDD of Part 63—Reporting Requirements

The permittee shall submit a(n)	The report must contain . . .	The permittee shall submit the report . . .
1. Compliance report	a. Information required in §63.7550(c)(1) through (5); and	Every 5 years according to the requirements in §63.7550(b).

- 3) The permittee may submit only a five-year compliance report as specified in §63.7550(b)(1) through (4). [§63.7550(b)]

- a. The first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in §63.7495 and ending on December 31 within five years after the compliance date that is specified for the permittee's source in §63.7495. [§63.7550(b)(1)]
 - b. The first five-year compliance report must be postmarked or submitted no later than January 31. [§63.7550(b)(2)]
 - c. Each subsequent five-year compliance reports must cover the applicable five-year periods from January 1 to December 31. [§63.7550(b)(3)]
 - d. Each subsequent five-year compliance reports must be postmarked or submitted no later than January 31. [§63.7550(b)(4)]
- 4) A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule. [§63.7550(c)]
- a. The permittee must submit a compliance report with the information in §63.7550(c)(5)(i) through (iii), (iv), (xiv), and (xvii). [§63.7550(c)(1)]
 - i. Company and Facility name and address. [§63.7550(c)(5)(i)]
 - ii. Process unit information, emissions limitations, and operating parameter limitations. [§63.7550(c)(5)(ii)]
 - iii. Date of report and beginning and ending dates of the reporting period. [§63.7550(c)(5)(iii)]
 - iv. The total operating time during the reporting period. [§63.7550(c)(5)(iv)]
 - v. Include the date of the most recent tune-up. Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. [§63.7550(c)(5)(xiv)]
 - vi. 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. [§63.7550(c)(5)(xvii)]
- 5) The permittee must submit the reports according to the procedures specified in §63.7550(3). [§63.7550(h)]
- a. The permittee shall submit all reports required by Table 9 of MACT DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee shall use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for MACT DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee shall submit the report to the Administrator at the appropriate address listed in §63.13. The permittee shall begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.
- 6) The permittee must keep records according to §63.7555(a)(1) and (2). [§63.7555(a)]
- a. A copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]
 - b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii). [§63.7555(a)(2)]
- 7) The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§63.7560(a)]
- 8) As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.7560(b)]

- 9) The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records off site for the remaining three years. [§63.7560(c)]
- 10) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [§70.6(a)(3)(iii)]

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

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) 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.

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

- 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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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

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.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) 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.

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 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

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 equipment malfunctions contributed to an exceedance.
- 3) 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 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
 - 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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. 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,

Permit Duration and Extension of Expired Permits

10 CSR 10-6.065(5)(C)1.B, 10 CSR 10-6.065(5)(E)3.C

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(5)(C)1.C

- 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 available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. 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 (5)(C)7.A 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 semiannual report shall be reported on the schedule specified in this permit.
- 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.

Risk Management Plan Under Section 112(r)

10 CSR 10-6.065(5)(C)1.D

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

Severability Clause

10 CSR 10-6.065(5)(C)1.F

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

General Requirements

10 CSR 10-6.065(5)(C)1.G

- 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 pursuant to 10 CSR 10-6.065(5)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(5)(C)1.H

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Reasonably Anticipated Operating Scenarios

10 CSR 10-6.065(5)(C)1.I

MACT MMMM: The permittee uses the Compliant Materials Option under Subpart MMMM. However it is permitted for the permittee to deviate and use the Emission rate without add-on controls option or the Emission rate with add-on controls option. If the permittee chooses to do this, the associated regulations within Subpart MMMM will apply

Compliance Requirements

10 CSR 10-6.065(5)(C)3

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and

Part 64 exceedances and excursions 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.

Permit Shield

10 CSR 10-6.065(5)(C)6

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions

10 CSR 10-6.065(5)(C)7

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

Operational Flexibility

10 CSR 10-6.065(5)(C)8

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

Off-Permit Changes

10 CSR 10-6.065(5)(C)9

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO

65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(B)3 of this rule. 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.

- 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; and
- d) The permit shield shall not apply to these changes.

Responsible Official

10 CSR 10-6.020(2)(R)34

The application utilized in the preparation of this permit was signed by Cassie Branch, Corporate Secretary. 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.

Reopening-Permit for Cause

10 CSR 10-6.065(5)(E)6

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MoDNR 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

10 CSR 10-6.065(5)(E)1.C

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.

Attachment A

Monthly VOC Emissions Tracking Record
 Aluminum Finishers, LLC
 Newton County, S06, T25, R30
 Project Number: 2018-05-008
 Installation ID Number: 145-0063

Permit Number:

This sheet covers the month of _____ in the year _____.

Copy this sheet as needed.

EU-01 Paint Booth Emissions				
Column 1	Column 2 (a)	Column 3	Column 4	Column 5
Material Used (Name, Type)	Amount of Material Used This Month (gals)	Material Density ³ (lbs/gal)	VOC Content ⁴ (Weight %)	VOC Emissions ⁵ (Tons)
EU-02, EU-04, and EU-05 Natural Gas Combustion Emissions				
Monthly Natural Gas Combusted (MMscf)		VOC Emission Factor ⁶		VOC Emissions ⁷ (Tons)
		5.5 lb/MMscf		
(b) Total VOC Emissions Rolling Calculated for this Month in Tons ⁸ :				
(c) 12-Month VOC Emissions Total from Previous Month's Worksheet A, in Tons:				
(d) Monthly VOC Emissions Total (b) from Previous Year's Worksheet A, in Tons:				
(e) Current 12-month Rolling Total of VOC Emissions in Tons: [(b) + (c) - (d)]				

³ Obtained from the SDS for the material. If specific gravity (s.g.) is provided, material density = 8.33 x s.g.
⁴ Obtained from the SDS for the material. If the VOC content is provided in lb/gal, VOC Content (wt%) = VOC Content (lb/gal) / Material Density (lb/gal)
⁵ VOC Emissions = Amount of material used this month (gal) x material density (lb/gal) x VOC Content (wt%) x 0.0005 ton/lb.
⁶ Obtained from AP-42 Section 1.4 "Natural Gas Combustion" (July 1998).
⁷ VOC Emissions = Monthly natural gas combusted (MMscf) x VOC emission factor (lb/MMscf) x 0.0005 ton/lb.
⁸ Total VOC emissions calculated for this month (tons) = the sum of all VOC emissions (tons) from each EU-01 material and from EU-02, EU-04, and EU-05 Natural gas combustion.

Attachment B
Monthly PM¹⁰ Emissions Tracking Record

Aluminum Finishers, LLC
 Newton County, S06, T25, R30
 Project Number: 2018-05-008
 Installation ID Number: 145-0063
 Permit Number:

This sheet covers the month of _____

Copy this sheet as needed.

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6
PM₁₀ Emissions From EU-01					
Material Used (Name)	Monthly Amount of Material Used (Gallons)	Material Density ³ (Pounds per Gallon)	Solids Content ⁹ (Weight %)	Control & Transfer Efficiency ¹⁰	PM ₁₀ Emissions ¹¹ (Tons)
				90% and 75%	
				90% and 75%	
				90% and 75%	
				90% and 75%	
EU-02, EU-04, and EU-05 Natural Gas Combustion Emissions					
Monthly Natural Gas Combusted (MMscf)			PM ₁₀ Emission Factor ¹²		PM ₁₀ Emissions ¹³ (tons)
			7.6 lb/MMscf		
EU-03 Haul Road Emissions					
Monthly Usage (VMT)			PM ₁₀ Emission Factor ¹⁴		PM ₁₀ Emissions ¹⁵ (ton)
			1.99 lb/VMT		
(a) Monthly PM ₁₀ Emissions ¹⁶ Tons:					
(b) 12-Month PM ₁₀ Emissions Rolling Total from Previous 12 Months Attachment B in Tons:					
(c) Monthly PM ₁₀ emissions from Previous Year's Attachment B in Tons:					
(d) Current 12 month Total of PM ₁₀ Emissions in Tons: [(c) + (d) - (e)]					

⁹ Obtained from the SDS for the material. If the solids content is provided in lb/gal, Solids Content (wt%) = Solids Content (lb/gal) / Material Density (lb/gal). If the solids content is not provided, Solids Content (wt%) = 1 – Volatile Content (wt%).

¹⁰ Control efficiency cannot be used in instances of control device malfunction.

¹¹ PM₁₀ Emissions (tons) = Monthly Amount of Material Used (gal) x Material Density (lb/gal) x (1- 0.75) x (1- 0.9) x 0.0005 ton/lb.

¹² Obtained from AP-42 Section 1.4 “Natural Gas Combustion” (July 1998).

¹³ PM₁₀ Emissions = Monthly natural gas combusted (MMscf) x PM₁₀ emission factor (lb/MMscf) x 0.0005 ton/lb.

¹⁴ Obtained from AP-42 Section 13.2.1 “Paved Roads” (January 2011). Haul road is 0.1 miles in length. Silt content is 8.3%. Unloaded truck weight of 20 tons, loaded truck weight of 30 tons, and 105 rain days per year

¹⁵ PM₁₀ Emissions = Monthly usage (VMT) x PM₁₀ emission factor (lb/VMT) x 0.0005 ton/lb.

¹⁶ Monthly PM₁₀ Emissions (tons) = the sum of all PM₁₀ Emissions (tons) from all materials used by EU-01; all natural gas combusted by EU-02, EU-04, and EU-05; and from EU-03 haul road.

Attachment C

Method 22 Visible Emissions Observations					
Installation Name			Observer Name		
Location			Date		
Sky Conditions			Wind Direction		
Precipitation			Wind Speed		
Time			Emission unit		
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.					
Minute	Seconds				Comments
	0	15	30	45	
Visible Emissions Yes (Y) or No (N)					
0					
1					
2					
3					
4					
5					
6					

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

Attachment D

Method 9 Opacity Observations		
Installation Name:	Sketch of the observer's position relative to the emission unit	
Emission Point:		
Emission Unit:		
Observer Name and Affiliation:		
Observer Certification Date:		
Method 9 Observation Date:		
Height of Emission Point:		
Time:	Start of observations	End of observations
Distance of Observer from Emission Point:		
Observer Direction from Emission Point:		
Approximate Wind Direction:		
Estimated Wind Speed:		
Ambient Temperature:		
Description of Sky Conditions (Presence and color of clouds):		
Plume Color:		
Approximate Distance Plume is Visible from Emission Point:		

Attachment D (continued) Method 9 Opacity Observations

Minute	Seconds				1-minute Avg. % Opacity ¹⁷	6-minute Avg. % Opacity ¹⁸	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity) ¹⁹								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
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27									
28									
29									
30									

The emission unit is in compliance if each six-minute average opacity is less than or equal to 20 %. Exception:
 The emission unit is in compliance if one six-minute average opacity is greater than 20 %, but less than 40%.

Was the emission unit in compliance at the time of evaluation (yes or no)?

 Signature of Observer

¹⁷ 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
¹⁸ 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
¹⁹ Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

STATEMENT OF BASIS

Installation Description

Aluminum Finishers, LLC applies coatings to architectural subsections which are required to meet the specifications of Architectural Aluminum Manufacturers Association Publication No. AAMA 605.2-2000. They are a high performance architectural coating manufacturer that uses aluminum extrusions to make prefabricated metal storefronts.

EP-01 is the eight station painting spray booth area which consists of a total of eight stacks, S1 through S8, where a combination of three coats of primer and paint are applied. This work area has the option to apply powder coating. Aluminum extrusions enter the paint booth area consisting of eight booths. The extrusions proceed through the booths and the coatings are applied. When utilized for wet painting the first two booths apply the primer or base coat, and the following booths apply the remaining color or clear coats. When utilized for powder coating, all of the booths can apply powder coating. The extrusions then proceed to the drying oven for final curing, to the coating manufacture's specifications, of the applied coatings.

An electrostatic paint system is utilized to minimize overspray. A percent transfer efficiency is used for the spray guns. A paint arrestor filter is given a value of 90 percent for control of particulate matter.

Powder coating systems capture and recirculate overspray material and therefore, are considered in terms of a "utilization rate" rather than a transfer efficiency. Most facilities achieve a powder utilization rate of 90 to 95 percent. This facility was assigned a conservative value of 90 percent. This implies that ten percent of the powder reports to the control filter. Also, the paint arrestor filter was assigned 90 percent for control of particulate matter and would apply when the powder coating is being utilized. Although powders are essentially 100 percent solids, they may produce small quantities of organic materials which may be released during the curing process. Up to five weight percent VOC can be released from powders during the curing process. Most powder overspray can be reclaimed and reused; however some reclaimed overspray must be reprocessed because it may contain larger and heavier granules that are not acceptable for reuse. The five percent VOC content was used in the calculation of the Potential to Emit (PTE) for the powder coating operation. Powder coating cannot occur while wet painting is being done in the same station of the booth. Therefore, the PTE of the installation utilizes the worst case pollutant from the worst case operation.

The eight individual work station booths can either wet spray or use powder coating but cannot operate both at the same time in the same station. Some of the eight stations could be powder coating and other stations wet spraying. When coated, the extrusions are then sent for an oven pass. The natural gas fired drying oven (EP-02) has two burners rated at 1.5 MMBtu/hr each. The oven is exhausted through stack S9. The oven with a conveyor inside is 120 feet long and the conveyor passes through it at a maximum rate of ten ft/min to allow the proper cure time for the coating by the coating supplier. The curing time can be varied by slowing the speed of the belt. The oven is fired by natural gas and is designed to operate within the 400 to 500°F range.

Since the last operating permit, two emission units, an annealing oven (EU-04) and process heaters (EU-05), have been added. The process heaters are used to maintain a temperature of 98 to 102 degrees

Fahrenheit in the four of the pretreatment tanks. Both newly included units have been included in PTE calculations.

A 0.1 mile paved haul road at the site is used to deliver materials and ship product. The emissions from this road were not included in the installation's PTE. The installation is not a named source; therefore, fugitive emissions do not count towards major source applicability.

This installation is a major source for HAPs. The installation is in an attainment/ unclassifiable area.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

Pollutants	Potential Emissions ¹	Reported Emissions				
		2017	2016	2015	2014	2013
Particulate Matter ≤ Ten Microns (PM ₁₀) ²⁰	≤ 15	0.60	1.00	0.36	0.69	0.08
Particulate Matter ≤ 2.5 Microns (PM _{2.5}) ²⁰	≤ PM ₁₀	0.60	1.00	0.25	0.58	0.08
Sulfur Oxides (SO _x)	0.02	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	2.74	0.18	0.18	0.15	0.61	0.12
Volatile Organic Compounds (VOC) ²¹	≤ 250	4.95	17.76	3.66	9.44	1.24
Carbon Monoxide (CO)	2.33	0.15	0.15	0.13	0.51	0.10
Hazardous Air Pollutants (HAPs) ²¹	367.34	5.00	17.76	0.28	0.00	0.00

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

- Doesn't include haul road (EU-03).
- Includes 90% control for the filter on EU-01.

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received May 2nd, 2018;
- 2) 2018 Emissions Inventory Questionnaire, received March 18th, 2019; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 4) All documents referenced under Construction Permit History.

²⁰ PM is limited to 15 tpy by Permit Condition 102010-001 PM the calculated controlled PTE for PM is 18.79 tpy, excluding the paved haul road (EU-03)

²¹ VOCs are limited to 250 tpy by Permit Condition 102010-001 VOC the calculated controlled PTE for VOC is 449.45 tpy.

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
 - a) This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri's State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP; therefore, it must appear in this Operating Permit.
 - b) This regulation does not apply to any of the sulfur emitting units (EU-02, EU-05, and EU-04) because they are natural gas fired. [6.260(1)(A)2.]
- 2) 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*
 - a) This installation is exempt from this regulation because all of its indirect heating sources combust only natural gas. [6.405(1)(E)]

Construction Permit History

- 1) Construction Permit 102010-001, Issued 10/5/2010
 - a) This permit authorized the construction of the following:
 - i) A dual purpose eight station powder coating booth capable of wet spray painting
 - ii) A natural gas drying and curing oven
 - b) The permit contained the following special conditions:
 - i) Special Condition 1. Emission Limitation for Volatile Organic Compounds (VOCs)
 - (1) Special Condition 1.A. requires an emission limit of less than 250.0 tons of VOCs from the entire installation for any consecutive 12-month period.
 - (2) Special Condition 1.B. requires record keeping for Special Condition 1.A.
 - (3) Special Condition 1.C. requires reporting for Special Condition 1.A.
 - (4) Special Condition 1. is cited in the operating permit as Permit Condition 102010-001 VOC
 - ii) Special Condition 2. Emission Limitation for Particulate Matter less than 10 microns in diameter (PM₁₀)
 - (1) Special Condition 2.A. requires emissions less than 15.0 tons of PM₁₀ for any consecutive 12-month period.
 - (2) Special Condition 1.B. requires record keeping for Special Condition 2.A.
 - (3) Special Condition 1.C. requires reporting for Special Condition 2.A.
 - (4) Special Condition 2. is cited in the operating permit as Permit Condition 102010-001 PM.
 - iii) Special Condition 3. Required Operating Conditions for Powder Coat and Spray Paint Booth Arrestor Filters.
 - (1) Special Condition 3.A. requires the operation and maintenance of arrestor filters on both EU-01 and EU-03 when being used for powder coating.
 - (2) Special Condition 3.B. requires monitoring for Special Condition 3.A.
 - (3) Special Condition 3.C. requires record keeping for Special Condition 3.A.

- (4) Special Condition 3. is cited in the operating permit as Permit Condition 102010-001 Powder Coat.
- iv) Special Condition 4. Required Operating Conditions for Thinner, Paints and Solvents.
 - (1) Special Condition 4. requires thinners, paints, and solvents to be kept in sealed containers when not in use.
 - (2) Special Condition 4. is cited in the operating permit as Permit Condition 102010-001 Thinner, Paints, and Solvents.
- v) Special Condition 5. Paved Haul Road Control
 - (1) Special Condition 5.A. requires the haul road to be paved.
 - (2) Special Condition 5.B. requires maintenance and repair of the road.
 - (3) Special Condition 5. is cited in the operating permit as Permit Condition Haul Road.
- 2) No Construction Permit Required Project No. 2018-04-048, Issued June 17th, 2018
 - a) This project was for the installation of a 2 MMBtu/hour natural gas annealing oven (EU-04)

New Source Performance Standards (NSPS) Applicability

None.

Maximum Achievable Control Technology (MACT) Applicability

- 1) 40 CFR Part 63, Subpart MMMM – *National Emission Standards for HAP for Surface Coating of Miscellaneous Metal Parts and Products*
 - a) This regulation applies to the installation and is cited in the operating permit as Permit Condition MACT Subpart MMMM
 - b) The compliant material option available under this regulation was included within the permit as the installation indicated this would be their primary choice for demonstrating compliance. Information regarding the emission rate without add-on controls option and the emission rate with add-on controls option is available at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=a381de93eb62713048e9d283adc2a3f3;rgn=div6;view=text;node=40%3A13.0.1.1.19;idno=40;cc=ecfr>
- 2) 40 CFR Part 63, Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*
 - a) This regulation applies to the process heaters (EU-05) and is cited in the operating permit as Permit Condition MACT DDDDD. However, the installation sells and replaces the process heaters on a yearly basis. A footnote has been added to Permit Condition MACT DDDD indicating that if they should operate the process heaters for the five years that the installation will be subject to the requirements. §63.7540(a)(13) provides basis for this determination and specifies that if the unit is not operating during the specified tune up date that the tune-up should be done within 30 days of startup, considering the unit is sold, the unit will never be started up by the installation.
 - b) This regulation does not apply to the drying oven (EU-02) or the annealing oven (EU-03) because they are direct fired.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
 - Uses a control device to achieve compliance, and
 - Has pre-control emissions that exceed or are equivalent to the major source threshold.
- 40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Greenhouse Gas Emissions

This source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

Inclusion of Process Heaters into the Operating Permit

On May 15th, 2018 a letter was sent to the Missouri Department of Natural Resources asking to incorporate five process heaters into the operating permit. However, the process heaters have always been present at the installation.

Aluminum Pretreatment Tanks

The nine 8,127 gallon aluminum pre-treatment tanks do not contain any VOCs or HAPS.

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

- a) This regulation does not apply to the following the following emission points due to the corresponding citations:

Emission Point	Description	Citation Under 6.220	Reason
EU-02	Drying Oven (0.003 MMScf (Natural Gas) (2010)	(1)(L)	Natural Gas Fired
EU-03	Paved Haul Road – 0.1 miles	(1)(K)	Fugitive Emission Regulated by 6.170
EU-04	Annealing Oven (2 MMBtu (Natural Gas) (2010)	(1)(L)	Natural Gas Fired
EU-05	(5) Process Heaters (0.25 MMBtu each) (Natural Gas) (2010)	(1)(L)	Natural Gas Fired

- b) This regulation applies to the paint booth (EU-01) and is cited in the operating permit under Permit Condition 6.220.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions

- a) Missouri’s SIP has not adopted this regulation; therefore, this regulation is a state only requirement. Upon adoption into Missouri’s SIP this regulation will be both a state and federal requirement.

- b) Only the record keeping and reporting portion of this regulation applies to the sulfur emitting units (EU-02, EU-04 and EU-05) because they are natural gas fired. This regulation is cited in the operating permit as Permit Condition 6.261. [6.621(1)(A)]

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

- a) This regulation does not apply to the drying oven or annealing oven (EU-02 and EU-04). The drying and annealing ovens are exempt because their uncontrolled particulate emissions are less than 0.5 lbs/hr (See calculations below). [6.400(1)(B)12.]

Calculations:

$$PTE = Ef(\text{lb}/\text{Unit}) \times MHDR(\text{Unit})$$

Emission Point	Description	Emission Factor	MHDR	PTE _U (lbs/hr)
EU-02	Drying Oven	3.00 lb/MMSCF ²²	0.003 MMSCF	0.009
EU-04	Annealing Oven	0.01 lb/MMBtu ²³	2 MMBtu	0.015

- b) This regulation does not apply to the haul road because it is a fugitive emission source and thus exempt. [6.400(1)(B)7.]
- c) This regulation does not apply to the paint booth because it has federally enforceable overall control of 90%. [6.400(1)(B)15.]
- d) This regulation does not apply to the process heaters (EU-05) because they are indirect heating sources. [6.400(1)(B)6.]

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 APCP'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).

²² Mass balance done in Project No. 2008-11-023

²³ AP-42 Table 1.4-2

Response to Public Comments

The draft Part 70 Operating Permit for Aluminum Finishers, LLC (145-0063) was placed on public notice as of June 21st, 2019 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>.

The Air Pollution Control Program received comments from EPA Region 7. The comments are addressed in the order in which they appear within the letter(s).

Comment 1: Permit Condition MACT MMMM incorporates requirements from 40 CFR Part 63, Subpart MMMM- *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* that are applicable to Aluminum Finishers, LLC-Granby. Some of Permit Condition MACT MMMM requirements, as presented in this draft operating permit, appear to be written in generic language and EPA believes incorporation of applicable federal standards should be facility specific.

As an example, EPA recommends MoDNR consider alternative wording of the *Emission Limitation*, in Permit Condition MACT MMMM, to read:

"The permittee shall limit organic HAP emissions to the atmosphere from the Eight-Station Paint Booth (EU-01) to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period." [§63.3890(a)(2)]

Response to Comment: Where appropriate, general language (ie. coating operation(s)) was replaced with "Eight Station Paint Booth (EU-01)"

Comment 2: Additionally, the Compliance Options Section, in Permit Condition MACT MMMM, includes requirements associated with three (3) regulatory compliance options. However, it appears that the permittee has elected to use the compliant material option. Therefore, requirements for the *Emission rate without add-on control options*, and *Emission rate with add-on control options* are not applicable. If the permittee anticipates utilizing a compliance option other than the compliant material option, it would appear the other potential compliance options might be better presented as Reasonably Anticipated Operating Scenarios pursuant to 10 CSR 10-6.065(5)(C)1.I, in Section V of the draft operating permit.

Response to Comment: A statement was added to the Reasonably Anticipated Operating Scenarios indicating that if the permittee should decide to use another compliance standard the corresponding parts of the regulation would apply.

Comment 3: Also, the Operating Limitations, Work Standards, and General Compliance requirements, included under the Compliant Material Option would be more applicable if they did not mention the *Emission rate without add-on controls option*. For example, EPA recommends MoDNR consider alternative wording of the Operating Limitations to read:

"The permittee is not required to meet any operating limits for any coating operation(s) on which the permittee uses the compliant material option." [§63.3892(a)]

Similarly, EPA recommends MoDNR consider alternative wording for the Work Standards to read: "The permittee is not required to meet any work practice standards for any coating operation(s) on which the permittee uses the compliant material option."
[§63.3893(a)]

Finally, EPA recommends MoDNR consider the following alternative wording for the General Compliance section under Compliant Material Option:

"The permittee must be in compliance with the emission limitation described above at all times for any coating operation(s) for which the permittee uses the compliant material option." [§63.3900(a)]

Response to Comment: Operating Limitations, Work Standards, and General Compliance requirements were adjusted to reflect this comment.

Comment 4: There are a few additional alternative wording opportunities EPA suggests that MoDNR might want to consider enhancing the adaptation of the MACT MMMM standards into this draft operating permit.

- In Reporting requirement 1) *Semiannual compliance reports*, of Permit Condition MACT MMMM, EPA suggests MoDNR consider an introductory sentence that reads: "The permittee shall submit semiannual compliance reports as specified in a) through e) below."
- In Record keeping 1), EPA suggests MoDNR consider an introductory sentence that reads: "The permittee must collect and keep records of the data and information specified in 2) through 12) below,"

Response to Comment: Reporting and Recordkeeping were updated to reflect this comment.