



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2011-017
Expiration Date: APR 14 2016
Installation ID: 021-0078
Project Number: 2010-04-056

Installation Name and Address

Altec Industries, Inc.
2106 Riverside Road
St. Joseph, MO 64507
Buchanan County

Parent Company's Name and Address

Altec Industries, Inc.
210 Inverness Center Drive
Birmingham, AL 35202

Installation Description:

Altec Industries manufactures aerial devices, digger derricks and specialty equipment for the electric utility, telecommunications and tree care industries. In addition to manufacturing of equipment for customers, the St. Joseph facility manufactures equipment components that support manufacturing operations at other Altec Industries facilities. Booms are produced on-site, as well as other equipment that might be needed on the utility truck. Altec then assembles the boom on the truck and transports it to their customers. Altec also operates a small research and development area as well as a customer service department on-site for repairing booms.

Processes include cutting, welding, and fabricating of steel. Powder coating and solvent/wet coating is also done. Fiberglass booms are produced using a centrifugal process and boom winding/gel coat process. Buckets are manufactured using a closed mold process.

APR 15 2011

Effective Date

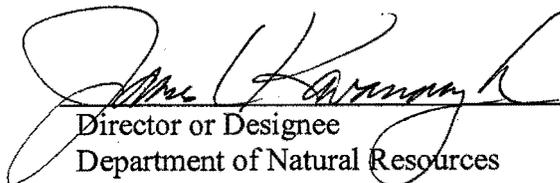

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Altec Industries manufactures aerial devices, digger derricks and specialty equipment for the electric utility, telecommunications and tree care industries. In addition to manufacturing of equipment for customers, the St. Joseph facility manufactures equipment components that support manufacturing operations at other Altec Industries facilities. Booms are produced on-site, as well as other equipment that might be needed on the utility truck. Altec then assembles the boom on the truck and transports it to their customers. Altec also operates a small research and development area as well as a customer service department on-site for repairing booms.

Processes include cutting, welding, and fabricating of steel. Powder coating and solvent/wet coating is also done. Fiberglass booms are produced using a centrifugal process and boom winding/gel coat process. Buckets are manufactured using a closed mold process.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2009	2008	2007	2006	2005
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.59	0.62	0.57	0.77	0.80
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.33	0.31	0.28	0.37	0.44
Sulfur Oxides (SO _x)	0.03	0.03	0.02	0.04	0.07
Nitrogen Oxides (NO _x)	1.90	2.33	2.05	1.91	2.06
Volatile Organic Compounds(VOC)	6.50	5.42	9.36	13.4	12.97
Carbon Monoxide (CO)	1.59	1.95	1.72	1.60	1.72
Lead (Pb)	0.00	0.00	0.00	0.00	0.01
Hazardous Air Pollutants (HAPs)	4.34	6.93	7.45	10.28	10.17
Ammonia (NH ₃)	0.06	0.07	0.07	0.06	0.07

EMISSION UNITS WITH LIMITATIONS

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

Emission

<u>Unit #</u>	<u>EQ EP</u>	<u>Description of Emission Unit</u>
EU0010	SB-1	Boom Sanding Operation
EU0020	FC-1	Welding Fume Dust Collector
EU0030	SB-3	Shot Blast Unit for Derrick Focus Factory Powder Coat Operation
EU0040	PC-2A	Powder Coat Booth for Derrick Focus Factory Powder Coat Operation
EU0050	SB-4	Shot Blast Unit for Derrick Assembly Powder Coat Operation
EU0060	PC-4A	Powder Coat Booth for Derrick Assembly Powder Coat Operation
EU0070	PB-20	Wet Paint Spray Booth
EU0080	PB-30	Wet Paint Spray Booth
EU0090	PB-31	Wet Paint Spray Booth
EU0100	PB-40	Wet Paint Spray Booth (formerly part of TCP-1)
EU0110	PB-41	Wet Paint Spray Booth (formerly part of TCP-1)
EU0120	PB-43	Wet Paint Spray Booth (formerly part of TCP-1)

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

AL-1, AL-2	Laser Metal Cutting Operation
DL-1, DL-2	Laser Metal Cutting Operation
B-1	10,000 gallon aboveground hydraulic oil storage tank
D-1	1,000 gallon aboveground diesel fuel storage tank
G-1	1,000 gallon aboveground gasoline storage tank
OH-1	Waste Oil Heaters
CO-1	Gas-fired Curing Oven for Booms Fabricated on the Winding Machine, 1.60 MMBtu/hr
PC-2B	Powder Coat Curing Oven for Derrick Focus Factory, 2.4 MMBtu/hr
PC-4B	Powder Coat Curing Oven for Derrick Assembly, 3.0 MMBtu/hr
MUA-20	Paint Booth Natural Gas Fired Make-Up Air Units, 4.75 MMBtu/hr x 2
MUA-30	Paint Booth Natural Gas Fired, Make-Up Air Unit, 5.25 MMBtu/hr
MUA-31	Paint Booth Natural Gas Fired, Make-Up Air Unit, 5.25 MMBtu/hr
BO-01	Natural gas fired burn-off oven, 0.85 MMBtu/hr
SB-2	2-Sanding Machines with dust collector
RES-1	Fiberglass Boom Manufacturing Operation
GC-2	Gel-Coat Spray Operation
PCM-1A	Bucket Manufacturing
PCM-1B	Mold Building Operations
BWO-1	Utility Vehicle Aerial Boom Winding Operation Utilizing Epichlorohydrin Resin
BW-2	Utility Vehicle Aerial Boom Winding Operation Utilizing an Epichlorohydrin Resin
FR-1	Resin Tank 1
FR-2	Resin Tank 2
FS-1	Flow-Solder Machine for Soldering Circuit Boards
RD-1	R&D Stresscoat Spraying
	30-gallon Naphtha parts washer
	55-gallon drums of hydraulic oil
	Spot welding

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

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

Emission Limitation:

1. Altec Industries, Incorporated shall emit less than 100 tons per 12-month period, rolled monthly, of VOCs.
2. The entire installation includes all equipment/ processes installed or permitted at Altec Industries, Incorporated as of the date of this permit.
3. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with the limitation.

Record Keeping:

1. The permittee shall calculate and record the installation-wide emissions of VOCs. Documentation verifying the calculation of all emission factors shall be kept on-site. The operator shall maintain the following records and reports:
 - a) Material safety data sheets for all coating materials, resins and solvents;
 - b) A monthly report indicating the total tons emitted during the month, and calculations showing compliance with the rolling average emission limits.
 - c) A set of example calculations showing the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions; and
 - d) These reports and records shall be immediately available for inspection at the installation.
2. Altec Industries, Incorporated 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.

Reporting:

Altec Industries, Incorporated shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which any records required by this permit show an exceedance of a limitation imposed by this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 072010-010, Project No. 2010-04-004, Issued July 29, 2010

Emission Limitation:

1. Altec Industries, Incorporated shall emit less than ten (10.0) tons individually and twenty-five (25.0) tons combined of Hazardous Air Pollutants (HAPs) in any consecutive 12-month period from the entire installation.
2. The entire installation includes all equipment/ processes installed or permitted at Altec Industries, Incorporated as of the date of this permit.

3. Attachment B and Attachment C shall be used to demonstrate compliance with Emission Limitation 1. In lieu of these attachments, Altec Industries, Incorporated may keep equivalent electronic records. At a minimum, Altec Industries, Incorporated must record the same information electronically as is specified in the attachments. Equivalent electronic records will be verified at the next inspection.

Recordkeeping:

Altec Industries, Incorporated 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.

Reporting:

Altec Industries, Incorporated shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which any records required by this permit show an exceedance of a limitation imposed by this permit.

PERMIT CONDITION PW003

10 CSR 10-6.060 Construction Permits Required

Permit to Construct 1198-006, Project No. 1998-07-016, Issued October 23, 1998

Permit to Construct 0299-001, Project No. 1998-12-046, Issued January 29, 1999

Permit to Construct 0799-007, Project No. 1999-05-041, Issued July 8, 1999

Permit to Construct 042000-003, Project No. 1999-11-084, Issued March 31, 2000

Permit to Construct 082000-015, Project No. 2000-05-141, Issued August 18, 2000

Permit to Construct 092000-003, Project No. 2000-06-083, Issued September 1, 2000

Restriction of Odors:

If a continued situation of demonstrated nuisance odors exists in violation of 10 CSR 10-2.070, the Director may require Altec Industries, Inc. to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. Altec Industries, Inc. shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be in violation of this permit.

III. Emission Unit Specific Emission Limitations

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

EU0010 and EU0020 – Boom Sanding & Welding Fume Collection			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0010	Boom Sanding Booth	JBI/JBI-88CO	SB-1
EU0020	Welding Fume Collection System	Torit/DFT 4-48	FC-1

<p>PERMIT CONDITION EU0010-01 and EU0020-01 10 CSR 10-6.060 Construction Permits Required Construction Permit 0299-001, Project No. 1998-12-046, Issued January 29, 1999 Condition 2 Dust Collectors</p>
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Equipment Specification:

The JBI Dust collection booth shall be used to control emissions from the Boom Sanding Operation (Emission Point SB-1) at all times the equipment is in operation. The Torit collector shall be used to control emissions from the fabrication operations (Emission Point FC-1) at all times the equipment is in operation.

The JBI Dust collection booth and Torit collector shall be operated and maintained in accordance with the manufacturer’s specifications. Replacement filters for the booth 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).

Recordkeeping:

Altec Industries, Inc. shall maintain an operating and maintenance log for the JBI Dust collection booth and Torit collector. The log shall include the following:

1. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
2. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

EU0030 and EU0040 –Powder Coat Booth for Derrick Focus			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0030	Shot Blast Unit for Derrick Focus Factory Powder	Jet Wheelblast/1Y0DA0504	SB-3
EU0040	Powder Coat Booth for Derrick Focus Factory Powder Coat Operation	Diemco, Inc./CW48W-360-4	PC-2A

<p>PERMIT CONDITION EU0030-01 and EU0040-01 10 CSR 10-6.060 Construction Permits Required Construction Permit 0799-007, Project No. 1999-05-041, Issued July 8, 1999 Condition 2 Dust Collectors</p>
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Equipment Specification:

The dust collector shall be used to control emissions from the powder coat shot blast booth (Emission Point SB-3) at all times the equipment is in operation. The cartridge filters shall be used to control emissions from the powder paint spray booth (Emission Point PC-2A) at all times the equipment is in operation. The dust collector and cartridge filters shall be operated and maintained in accordance with the manufacturer's specifications. Replacement filters/cartridges for the booths shall be kept on hand at all times. The filters/cartridges shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance and abrasion resistance).

Recordkeeping:

Altec Industries, Inc. shall maintain an operating and maintenance log for the dust collector and cartridge filters. The log shall include the following:

1. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
2. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

EU0050 and EU0060 – Powder Coating Booth for Derrick Assembly			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0050	Shot Blast Booth-Fabrication Building	Jet Wheelblast 1Y0DA0504	SB-4
EU0060	Powder Coat Spray Booth-Derrick Assembly	Diemco, Inc CW48W-360-4	PC-4A

<p align="center">PERMIT CONDITION EU0050-01 & EU0060-01 10 CSR 10-6.060 Construction Permits Required Construction Permit 092000-003, Project No. 2000-06-083, Issued September 1, 2000 Condition 2 Dust Collectors</p>

Equipment Specification:

The dust collector shall be used to control emissions from the powder coat shot blast booth (Emission Point SB-4) at all times the equipment is in operation. The cartridge filters shall be used to control emissions from the Powder Coat Spray Booth (Emission Point PC-4A) at all times the equipment is in operation. The dust collector and cartridge filters shall be operated and maintained in accordance with the manufacturer's specifications. Replacement filters/cartridges for the booths shall be kept on hand at all times.

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

Recordkeeping:

Altec Industries, Inc. shall maintain an operating and maintenance log for dust collector and cartridge filters controlling the points listed above. The log shall include the following:

1. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
2. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

EU0070 through EU0120 – Paint Booths			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0070	Wet Paint Spray Booth, HVLP Spray Gun	900SWDDDT	PB-20
EU0080	Wet Paint Spray Booth, HVLP Spray Gun	TSD5060	PB-30
EU0090	Wet Paint Spray Booth, HVLP Spray Gun	TSD5060	PB-31
EU0100	Wet Paint Spray Booth, HVLP Spray Gun	Unknown	PB-40
EU0110	Wet Paint Spray Booth, HVLP Spray Gun	Unknown	PB-41
EU0120	Wet Paint Spray Booth, HVLP Spray Gun	Unknown	PB-43

PERMIT CONDITION EU0080-01 & EU0090-01
10 CSR 10-6.060 Construction Permits Required
Construction Permit 032005-011, Project No. 2004-10-006, Issued March 11, 2005

Equipment Specification:

Fabric filters must be in use at all times when the paint booths PB-30 and PB-31 are in operation and shall be operated and maintained in accordance with the manufacturer’s specifications.

Operational Limitation:

Altec Industries, Inc. shall keep the paints and cleaning solutions in sealed containers whenever the materials are not in use. Altec Industries, Inc. shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.

PERMIT CONDITION
EU0070-01, EU0080-02, EU0090-02, EU0100-01, EU0110-01 and EU0120-01
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Operational Requirements:

1. These units are provided a conditional exemption from this rule per §6.400(1)(B)14.
2. The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring and maintenance requirements for the associated control devices.
3. A control system must be in use at all times when the paint booths PB-20, PB-30, PB-31, PB-40, PB-41 and PB-43 are in operation and shall be operated and maintained in accordance with the manufacturer’s specifications.

Equipment Specification:

1. The control system must be designed to control at least 95 percent of the particulate overspray.
2. Replacement filters/cartridges for the booths shall be kept on hand at all times.

Monitoring:

1. Booths equipped with mat/panel filters shall not be operated without a filter in place.
2. The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
3. The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
4. The manufacturer’s recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Record Keeping:

1. The permittee shall maintain records of inspections of mat/panel filters when they occur. All inspections, corrective actions, and instrument calibrations shall be recorded.
2. All records shall be kept on-site for a minimum of five (5) years and made available to the Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the permittee determined that the emission unit(s) exceeded the limitation listed above.
2. The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is 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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and
 4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall

be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of

emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.

- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation, which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.

- 3) 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.
- 4) 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.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

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

The permittee shall maintain the following monitoring schedule:

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

Recordkeeping:

The permittee shall document all readings, noting the following:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-2.070 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

Emission Limitation:

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

Monitoring:

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

Recordkeeping:

The permittee shall maintain records of all observation results, noting:

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

- b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

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

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

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

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

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

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

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

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

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

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

None.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions
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- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and

- d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

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

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

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;

- b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

STATEMENT OF BASIS

Voluntary Limitations

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

Altec Industries will limit the amount of VOC emissions generated from all facility operations below 100 tons over any consecutive 12-month period. Altec Industries will limit the HAPS emissions generated from all facility operations below ten tons for any individual HAP and 25 tons for total HAPS over any consecutive 12-month period.

Permit Reference Documents

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

1. Intermediate Operating Permit Application, received April 20, 2010;
 - a) A "Confidential Version Not for Public Review" version of the operating permit application was used to determine the potential-to-emit for a boom winding operation. Included in the confidential permit information is boom weighing data, equipment (including capacities), and chemicals used in the process. Since this information deals with the manufacturing process, Altec asked that this not be available in the public file. A confidential version of the operating permit is not necessary because the confidential material is only used as support material.
2. 2008 Emissions Inventory Questionnaire, received May 20, 2009; and
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

40 CFR Part 63, Subpart HHHHHH, Miscellaneous Surface Coating Operations at Area Sources
Methylene chloride is not used for paint stripping operations §63.11170(a)(1). The target HAPs are not contained in the paints and coatings. §63.11170(a)(3) The subpart is applicable, because of the surface coating operations §63.11170(a)(2), until Altec receives a waiver from the Administrator (EPA).
"...However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180...". §63.11170(a)(2)

Altec applied to EPA Region 7 for an exemption 6H on August 4, 2010. The exemption was issued by EPA on November 3, 2010.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-2.210, *Control of Emissions from Solvent Metal Cleaning*

This rule is only applicable in Clay, Jackson and Platte Counties.

10 CSR 10-2.230, *Control of Emissions from Industrial Surface Coating Operations*

This rule is only applicable in Clay, Jackson and Platte Counties.

10 CSR 10-2.040, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

Natural Gas Indirect Heating Sources	EIQ	Date Installed	Heat Input (MMBtu/hr)	Limit (lbs/MMBtu)
Paint Booth Make-up Air	MUA-20	2000	4.75 x 2 sources	0.4
Paint Booth Make-up Air	MUA-30	1993	5.25	
Paint Booth Make-up Air	MUA-31	1993	5.25	
Powder Coat Curing	PC-2B	1999	2.4	
Powder Coat Curing	PC-4B	2000	3.0	
Boom Curing Oven	CO-1	1997	1.6	
Burn-off Oven	BO-01	2004	0.85	
TOTAL Q			27.85	
1. Existing before 2/16/1979			$E = 1.09 \times Q^{-0.259} = 0.18 \text{ lbs/MMBtu}$	
2. New 2/16/1979 and later and less than 10 MMBtu/hr			0.4 lbs/MMBtu	

The emission factor for total particulate matter, from AP42 Natural Gas Combustion Table 1.4-2, is 7.45×10^{-3} lb/MMBtu. This is well below the limit of 0.4 lbs/MMBtu that applies to each source; therefore an emission limitation is not included in the permit for 10 CSR 10-2.040.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

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

The natural gas heating units, laser metal cutting operations and waste oil heaters were reported in the operating permit application as insignificant sources. The powder coating operations are insignificant because they are list in 10 CSR 10-6.061(3)(A)2.V.(IV) as exempt from construction permitting. The emissions from the sanders SB-1 and SB-2 and the shot blast units SB-1 and SB-2 are filtered and exhausted inside the building. The spray paint booths are required by operating permit condition to use a control device that provides a minimum of 95 percent removal of particulate. This regulation is not cited as applicable to any specific emission point because visible emissions are unlikely.

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

In accordance with 10 CSR 10-6.260(1)(A)2., this rule does not apply to combustion equipment that uses exclusively pipeline grade natural gas.

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

This rule is not applicable to the powder coating guns PC-4A and PC-2A because Section (1)(B)8. of the rule exempts emission sources that are exempt from construction permitting under 10 CSR 10-6.061. 10 CSR 10-6.061(3)(A)2.V.(IV) exempts "Surface coating operations utilizing powder coating materials with the powder applied by an electrostatic powder spray gun or an electrostatic fluidized bed;". The Altec powder coating operations utilize a gun that supplies a consistent charge to the powder as it leaves the gun.

The boom sanding SB-1 and SB-2 and shot blast SB-3 and SB-4 are also exempt using 10 CSR 10-6.400 (1)(B)8. 10 CSR 10-6.061(3)(A)2.DD. exempts "Carving, cutting, routing, turning, drilling, machining, sawing, sanding, planning, buffing, or polishing solid materials, other than materials containing any asbestos, beryllium, or lead greater than one percent by weight as determined by Material Safety Data Sheets, vendor material specifications and/or purchase order specifications, where equipment-...(III) is exhausted inside a building...". All of the units exhaust inside the building and are equipped with 99 percent removal filters. The steel that is used to fabricate the bodies, and is shot blasted, is below the threshold of 0.1 percent for cadmium, chromium, lead or nickel and less than 1.0 percent for manganese. The fiberglass booms do not contain asbestos, beryllium or lead.

The indirect heating sources are exempted by 10 CSR 10-6.400(1)(B)6. and the rule excludes liquids and gases used solely as fuels 10 CSR 10-6.400(2)(A).

The wet painting is excluded by 10 CSR 10-6.400(1)(B)14. because the coating operations are equipped with control systems designed to control at least 95 percent of the particulate overspray. The control efficiency is 96.75 percent for each paint booth according to the operating permit application. PB-30 and PB-31 have construction permit conditions requiring fabric filters be in use at all times that PB-30 and PB-31 are in operation. A condition was added that requires filters be used at all times that any of the paint booths are in operation.

Construction Permits

Permit to Construct 1198-006, Project No. 1998-07-016, Issued October 23, 1998

The styrene limit of one ton in any consecutive 12-month period for the boom gel coat spraying operation (GC-2) was superseded by Permit to Construct 042000-003, Project No. 1999-11-084, issued March 31, 2000. Only the Restriction of Odors condition is incorporated by reference in this operating permit.

Permit to Construct 042000-003, Project No. 1999-11-084, Issued March 31, 2000

Permit to Construct 042000-003 removes the one ton limit imposed by Construction Permit 1198-006. The gel coat spraying was the only specific unit with limits, only the Restriction of Odors condition is incorporated by reference in this operating permit.

Permit to Construct 0299-001, Project No. 1998-12-046, Issued January 29, 1999

Permit to Construct 299-001 refers to “The cartridge filters shall be used to control emissions from the Powder Paint Spray Booth (Emission Point PC-1) at all times the equipment is in operation.” The PC-1 related conditions are not referenced in the operating permit. PC-1 has been removed from the plant site.

Permit to Construct 0799-007, Project No. 1999-05-041, Issued July 8, 1999, is referenced.

Permit to Construct 082000-015, Project No. 2000-05-141, Issued August 18, 2000, is referenced.

Permit to Construct 092000-003, Project No. 2000-06-083, Issued September 1, 2000, is referenced.

Permit to Construct 012003-002, Project No. 2002-09-111, Issued December 11, 2002

Permit to Construct 012003-002 was for the vacuum casting, laser metal cutting operation and four dust collecting units. The vacuum casting was constructed but later dismantled. A site visit on November 11, 2008, by Paul Kochan, confirmed that the equipment for the vacuum casting emission point VM-1, did not appear to be on-site. The only limitation in the permit was for styrene from the fiberglass vacuum molding operation. The permit is not incorporated by reference by this operating permit.

Permit to Construct 032005-011, Project No. 2004-10-006, Issued March 11, 2005, is referenced.

Permit to Construct 072010-010, Project No. 2010-04-004, Issued July 29, 2010, is referenced.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

This rule applies to tanks storing VOC liquids that have a capacity greater than or equal to 75 m³ (19,812 Gal). All tanks on the plant site are less than 19,812 gallons. This rule does not apply.

40 CFR Part 60, Subpart CCCC—*Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001*

This rule does not apply to the Paint Burn-Off Oven BO-01 because of §60.2020 “What combustion units are exempt from this subpart?... (k) Rack, part, and drum reclamation units. (See §60.2265)”. “Rack reclamation unit means a unit that burns the coatings off racks used to hold small items for application of a coating. The unit burns the coating overspray off the rack so the rack can be reused.” §60.2265

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart MMMM, *Surface Coating Misc Metal Parts and Products*

This subpart does not apply because it applies to major sources only §63.3881(b). Altec has taken voluntary limitations since the May 15, 1997 intermediate operating permit application.

40 CFR Part 63, Subpart WWWW, *Reinforced Plastic Composites Production*

This subpart does not apply because it applies to major sources only §63.5785(a). Altec has taken voluntary limitations since the May 15, 1997 intermediate operating permit application.

40 CFR Part 63, Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

The subpart does not apply to NAICS 336211 – Motor Vehicle Body Manufacturing or Utility Vehicle Equipment SIC 37 §63.11514(a). In addition, the steel used to fabricate the bodies is below the threshold of 0.1 percent for cadmium, chromium, lead or nickel and less than 1.0 percent for manganese.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Other Regulatory Determinations

The application lists PC-1A Powder Coat Curing Oven, PC-1 Powder Coat Spray Booth and one spray booth from emission point TCP-1 as being removed from the plant site.

10 CSR 10-6.020(2)(I)4. Insignificant activity-An activity or emission unit in which the only applicable requirement would be to list the requirement in an operating permit application under 10 CSR 10-6.065 and is either of the following:

- A. Emission units whose aggregate emission levels for the installation do not exceed that of the *de minimis* levels; and
- B. Emission units or activities listed in 10 CSR 10-6.061 as exempt or excluded from construction permit review under 10 CSR 10-6.060.

The application listed the following emission points as insignificant:

EU_ID	Description	Potential Estimated Emissions (tons/year)						
		PM ₁₀	SO _x	NO _x	VOC	CO	Lead	HAPS
AL-1 and AL-2	Laser Metal Cutting Operation	0.05						0.00
DL-1 and DL-2	Laser Metal Cutting Operation	0.05						0.00
B-1	10,000 gallon aboveground hydraulic oil storage tank				0.00			
D-1	1,000 gallon aboveground diesel fuel storage tank				0.00			
G-1	1,000 gallon aboveground gasoline storage tank				0.08			0.00
OH-1	Waste Oil Heaters	0.01	0.01	0.00	0.00	0.00	0.00	0.00

Other insignificant emission points.

EU_ID	Description	Potential Estimated Emissions (tons/year)						
		PM ₁₀	SO _x	NO _x	VOC	CO	Lead	HAPS
FC-1	Fume Collection*	0.91						0.05
FR1	Styrene Tank				0.007			0.006
FR2	Styrene Tank				0.007			0.006
FS-1	Flow Solder Machine				0.37		0.18	
RD-1	R&D Stresscoat Spraying**				0.047			
	30-gallon Naphtha parts washer				0.372			
	55-gallon drums hydraulic oil				0			
	Spot welding	0.2						
CO-01	Boom Curing Oven	0.05	0.00	0.69	0.04	0.57		
PC-2B	Powder Coat Oven	0.08	0.01	1.03	0.06	0.86		
PC-4B	Powder Curing Oven	0.10	0.01	1.29	0.07	1.08		
MUA-20	Make-up Air Unit	0.31	0.02	4.08	0.22	3.41		
MUA-30	Make-up Air Unit	0.17	0.01	2.25	0.12	1.89		
MUA-31	Make-up Air Unit	0.17	0.01	2.25	0.12	1.89		
BO-01	Burn-off Oven	0.03	0.00	0.36	0.02	0.31		
	Heater Total	0.91	0.06	11.95	0.65	10.01		
SB-1	Boom Sanding*	0.39						
SB-2	Boom Sanding with control device	1.31						
SB-3	Shot Blast for Derrick*	1.05						
SB-4	Shot Blast Booth*	1.05						
	Sanding/Blasting Total	3.8						

*using NSR required control device

**The R&D Stresscoat Spraying(RD-1) is also considered insignificant because it is used solely for research and development for stress detection in prototype equipment. Laboratory equipment used exclusively for chemical and physical analysis or experimentation is considered an exempt emission unit under 10 CSR 10-6.061(3)(A)2.L

Aggregate levels above de minimis levels.

Estimated potential emissions using operating and construction permit applications:

EU_ID	Description	Potential Estimated Emissions (tons/year)						
		PM ₁₀	SO _x	NO _x	VOC	CO	Lead	HAPS
PB-20	Paint Booth**	0.40			9.4			0.8
PB-30,31	Paint Booth*	0.68			28.4			5.9
PB-40,41,43	Paint Booth**	0.27			10.1			2.1
PC-2A	Powder Coating Booth*	0.66						
PC-4A	Powder Coating Booth*	6.57						
	Totals	8.58			47.9			8.8
RES-1	Centrifugal Fiberglass Boom Mfg				31.6			16.90
GC-2	Gel Coat Open Mold				6.1			5.7
PCM-1A, 1B	Platform Closed Molding				4.8			3.2
BWO-1	Boom Winding Operation				0.00			0.00
BW-2	Boom Winding Operation				0.00			0.00
	Totals				42.5			25.8
Significant Source Totals		8.6	0.0	0.0	90.4	0.0	0.0	34.6

*using NSR required control device

**using OP required control device

Altec claims the following bottlenecks:

Spray Painting

- 2.75 hours avg. prep time- this includes masking the body, wipe down of the body (they use acetone/water mix), paint prep;
- 8 hours average painting and dry time- average approximately 2.5 hours paint time and 5.5 hours dry time;
- 2.25 hours average post time for de-masking and clean-up.

Gel Coating

Gel coat is applied during one, eight-hour shift, and prep and curing occur in the other 2 shifts.

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

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

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

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

Prepared by:

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