Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

FEB 1 1 2020

Cassie Branch
Architectural Systems Inc.
P.O. Box 519
Monett, MO 65708

Re: Part 70 Operating Permit
Installation ID: 009-0062, Permit Number: OP2020-006

Dear Cassie 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:ST

Enclosures

c: PAMS File: 2017-10-064

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

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: OP2020-006
Expiration Date: FEB 1 1 2025
Installation ID: 009-0062
Project Number: 2017-10-064

Installation Name and Address
Architectural Systems Inc.
707 West Highway 60
Monett, MO 65708
Barry County

Parent Company's Name and Address
Architectural Systems, Inc
P.O Box 519
Monett, MO 65708

Installation Description:
The permittee applies coatings to architectural subsections. Equipment located at the site includes eight paint booths with a total design rate of 16.75 gallons per hour, a 1.3 MMBtu per hour drying oven, a phosphate washer/coating operations with three 0.25 MMBtu per hour natural gas heaters and a 0.8 MMBtu per hour paint hook burn-off oven. The installation is required to obtain a Part 70 operating permit based on potential emissions of volatile organic compounds and hazardous air pollutant greater than the major source thresholds.

FEB 1 1 2020
Effective Date

Director or Designee
Department of Natural Resources

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707 West Highway 60
Monett, MO 65708
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Parent Company's Name and Address
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Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

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 of Emission Units
EP01S1	Paint Booth, Station 1 Stack, 16.75[1] gal/hr (2000)
EP01S2	Paint Booth, Station 2 Stack, 16.75 gal/hr (2000)
EP01S3	Paint Booth, Station 3 Stack, 16.75 gal/hr (2000)
EP01S4	Paint Booth, Station 4 Stack, 16.75 gal/hr (2000)
EP01S5	Paint Booth, Station 5 Stack, 16.75 gal/hr (2000)
EP01S6	Paint Booth, Station 6 Stack, 16.75 gal/hr (2000)
EP01S7	Paint Booth, Station 7 Stack, 16.75 gal/hr, (Under Construction)
EP01S8	Paint Booth, Station 8 Stack, 16.75 gal/hr, (Under Construction)
EP02	Drying Oven Heater, Natural Gas, 1.3 MMBtu/hr (2000)
EP03	Pre-Treatment Process Heater, 3 Stage Phosphate Washer/Coater Operation, Natural Gas, 0.75 MMBtu/hr (2000)
EP04	Burn Off Oven, Natural Gas, 0.8 MMBtu/hr (2018)
EP05	0.1 Mile Paved Haul Road

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Unit	Description of Emission Unit
EP06	Five 4,500 gallon tanks (1 Caustic Bath, 2 Caustic Rinse, 1 Chrome Bath, 1 Chrome Rinse)

[1] The MHDR of 16.75MMBtu/hr is the combined MHDR for entire Eight-Station Paint Booth

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 Limitations.

Permit Condition PW1
10 CSR 10-6.060 Construction Permits Required
Construction Permit 012018-003A, Issued August 23rd, 2018

Emission Limitations

1) The permittee shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation. [Special Condition 2.A]
2) The permittee shall emit less than 10.0 tons of $PM_{2.5}$ and less than 15.0 tons of PM_{10} in any consecutive 12-month period from the entire installation. [Special Condition 2.B]
3) The permittee shall emit less than the Screening Model Action Level for each individual HAP in any consecutive 12-month period from the entire installation. [Special Condition 2.C]
4) The permittee shall include the startup, shutdown, and malfunction emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 towards these limits. [Special Condition 2]

Alternative Materials

1) The permittee may use materials other than those listed in the Application for Authority to Construct, according to following [Special Condition 7.A.]
   a) The permittee shall use the material's SDS and/or EDS sheet to determine the VOC, HAPs, and particulate[2] concentrations. [Special Condition 7.B.]
   b) The permittee shall compare substances listed on the SDS and/or EDS to those chemicals listed on the Table of HAPs and SMAL in order to identify HAPs. [Special Condition 7.B.]
   c) The permittee shall then use the highest VOC, HAP, and particulate concentrations listed on the material's SDS and/or EDS sheet to calculate and track emissions from the new material. [Special Condition 7.B.]
2) The permittee shall maintain a list of alternative materials used in the spray booths that were not previously included in the permit application using Attachment B or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition. [Special Condition 7.A.]
3) The permittee shall include the emissions from all alternative materials in the compliance demonstrations for all emission limitations.

Monitoring and Recordkeeping

1) The permittee shall monitor and record the monthly and consecutive 12 month total emissions for VOC, PM_{10}, $PM_{2.5}$, and HAPs using Attachments A through G or equivalent forms, such as

[2] Particulates are typically listed as solids content on SDS

electronic forms, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition. [Special Condition 2.D]

2) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS and/or EDS for all materials used.

Reporting

1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
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.

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 1 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart MMMM - National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products		
Emission Unit	Description	Control
EP01S1	Paint Booth, Station 1 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S2	Paint Booth, Station 2 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S3	Paint Booth, Station 3 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S4	Paint Booth, Station 4 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S5	Paint Booth, Station 5 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S6	Paint Booth, Station 6 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S7	Paint Booth, Station 7 Stack, 16.75 gal/hr (Under Construction)	Paint Arrestor Filter
EP01S8	Paint Booth, Station 8 Stack, 16.75 gal/hr (Under Construction)	Paint Arrestor Filter

Emission Limitations

1) The permittee must limit organic HAP emissions 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(b)(2)]
2) The permittee must include all coatings, thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the emission limitation calculated as a rolling 12-month emission rate and determined on a monthly basis. [§63.3891(b)]
3) The permittee must be in compliance with the emission limit at all times. [§63.3900(a)(1)]

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 (EP01) 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 (EP01) 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 (EP01), 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 (EP01), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the Eight Station Paint Booth (EP01) 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 (EP01) 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)]

Emission Rate without Add-On Controls Option[3]

Continuous Compliance

1) The permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment for purposes of complying with MACT MMMM, according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]
2) The permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3). [§63.3900(c)]
   a) The permittee must address the startup, shutdown, and corrective actions in the event of a malfunction of the add-on control device in the plan. [§63.3900(c)]
   b) The permittee must address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions in the plan. [§63.3900(c)]
3) The permittee must limit the organic HAP emission rate for each compliance period to less than or equal to the emission limit. [§63.3952(a)]

[3] The permittee has decided to comply with MACT MMMM by using emission rate without add-on controls

a) A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. [§63.3952(a)]
b) The permittee must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. [§63.3952(a)]
c) If the organic HAP emission rate for any 12-month compliance period exceeds the emission limit, this is a deviation from the emission limitation for that compliance period and the permittee must report it in semiannual compliance report. [§63.3952(b)]
d) As part of each semiannual compliance report, the permittee must identify the coating operations for which the permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the permittee must submit a statement that the coating operations were in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit. [§63.3952(c)]

Recordkeeping and Reporting

1) The permittee must submit semiannual compliance reports according to the following: [§63.3920(a)]
   a) Unless the Director has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee must prepare and submit each semiannual compliance report according to the following timeline: [§63.3920(a)(1)]
      i) 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)]
      ii) Each subsequent semiannual compliance report must cover the 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)]
      iii) Each semiannual compliance report must be postmarked or delivered no later than September 30 or March 31, whichever date is the first date following the end of the semiannual reporting period.
   b) The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA). [§63.3920(a)]
      i) The permittee may submit the semiannual compliance report for MACT MMMM along with, or as part of, the semiannual monitoring report in order satisfy any obligation to report any deviations duplicated between the two. [§63.3920(a)(2)]
         (1) This only applies if the semiannual compliance report includes all required information concerning deviations from any emission limitation of MACT MMMM. [§63.3920(a)(2)]
         (2) The submission of a semiannual compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the Director. [§63.3920(a)(2)]
   c) The permittee must include the following information in the semiannual compliance report: [§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. [§63.3920(a)(3)(iii)]
      iv) Identification of the compliance option 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) The calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. [§63.3920(a)(3)(v)]

vi) If there were no deviations from the emission limitations, 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)]

vii) If there was a deviation from the emission limit, the semiannual compliance report must contain the following information: [§63.3920(a)(6)]

(1) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit. [§63.3920(a)(6)(i)]

(2) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). [§63.3920(a)(6)(ii)]

(3) The permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports). [§63.3920(a)(6)(ii)]

(4) A statement of the cause of each deviation. [§63.3920(a)(6)(iii)]

2) The permittee must collect and keep records of the data and information specified in §63.3930. Failure to collect and keep these records is a deviation from the applicable standard. [§63.3930]

a) The permittee must keep a copy of each notification and report that the permittee submitted to comply with MACT MMMM, and the documentation supporting each notification and report. [§63.3930(a)]

b) The permittee must keep records of any data used in the calculation of the emission limit for each 12-month compliance period included in the semi-annual compliance reports. [§63.3930(a)]

c) The permittee must keep 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. [§63.3930(b)]

d) The permittee must keep a copy of the testing the permittee used to determine mass fraction of organic HAP, density, or volume fraction of coating solids, [§63.3930(b)]

e) The permittee must keep the summary sheet of results provided to the permittee by the manufacturer or supplier. [§63.3930(b)]

f) The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]

g) For each compliance period: [§63.3930(c)]

i) The permittee must keep a record of the coating operations on which the permittee used emission rate without control and the time periods (beginning and ending dates and times) for each option used. [§63.3930(c)(1)]

ii) The permittee must keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of

§63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951. [§63.3930(c)(3)]

h) The permittee must keep a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period [§63.3930(d)]
i) The permittee must keep 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)]
j) The permittee must keep a record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
k) The permittee must keep a record of the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. [§63.3930(g)]
l) For organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF), the permittee must keep records of the following information: [§63.3930(h)]
    i) The name and address of each TSDF to which the permittee sent waste materials. [§63.3930(h)(1)]
    ii) A statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility. [§63.3930(h)(1)]
    iii) The date of each shipment. [§63.3930(h)(1)]
    iv) 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. [§63.3930(h)(2)]
    v) 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. [§63.3930(h)(3)]
    vi) The methodology used to determine the mass of organic HAP contained in 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)]
m) The permittee must keep records of the date, time, and duration of each deviation. [§63.3930(j)]

3) The permittee's records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
4) 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)]
5) 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)]
6) 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 2 10 CSR 10-6.060 Construction Permits Required Construction Permit 072008-010, Issued July 28th, 2008		
Emission Unit	Description	Control
EP01S1	Paint Booth, Station 1 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S2	Paint Booth, Station 2 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S3	Paint Booth, Station 3 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S4	Paint Booth, Station 4 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S5	Paint Booth, Station 5 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S6	Paint Booth, Station 6 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP05	0.1 Mile Paved Haul Road	N/A

Operational Limitations

1) The permittee shall control emissions from spray paint booth stacks (EP01S1 through EP01S6) using paint arrestor filters at each stack as follows: [Special Condition 4.A.]
   a) The permittee shall operate and maintain each filter in accordance with the manufacturer's specifications. [Special Condition 4.A.]
   b) The permittee shall only use filters made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 4.A.]
   c) The permittee shall keep replacement filters on hand at all times. [Special Condition 4.A.]
2) The permittee shall keep the thinners, paints, solvents and cleaning solutions in sealed containers whenever the materials are not in use. [Special Condition 5]
3) The permittee shall control fugitive emissions from 0.1 miles of haul road at this site by washing/cleaning.[4] [Special Condition 6]

Monitoring and Recordkeeping

1) The permittee shall equip each filter with a gauge or meter, which indicates the pressure drop across the filter. [Special Condition 4.A.]
   a) The permittee shall install each gauge or meter such that the Department of Natural Resource employees may easily observe them. [Special Condition 4.A.]
2) The permittee shall monitor and record the operating pressure drop across each filter at least once every 24 hours using Attachment H or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition. [Special Condition 4.B.]
   a) The permittee shall maintain the operating pressure drop within the design conditions specified by the manufacturer's performance warranty. [Special Condition 4.B.]
3) The permittee shall maintain an operating and maintenance log for each filter using Attachment I or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition, which includes the following:
   a) Incidents of malfunction, within impacts on emissions, duration of event, probable cause, and corrective actions: and [Special Condition 4.C.]
   b) Maintenance activities, with inspection schedule, repair actions and replacements, etc. [Special Condition 4.C.]

[4] Paving requirements were removed due to the fact that paving has already occurred.

4) The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent, paint, and cleaning solution containers used with this equipment sufficient to identify the contents. [Special Condition 5]
5) The permittee shall conduct maintenance and/or repair of the road surface as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas. [Special Condition 6.B.]
6) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS and/or EDS for all materials used.

Reporting

1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
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 3 10 CSR 10-6.060 Construction Permits Required Construction Permit 012018-003A, Issued August 23rd, 2018		
Emission Unit	Description	Control
EP01S7	Paint Booth, Station 7 Stack, 16.75 gal/hr (Under Construction)	Paint Arrestor Filter
EP01S8	Paint Booth, Station 8 Stack, 16.75 gal/hr (Under Construction)	Paint Arrestor Filter

Operational Limitations

1) The permittee shall capture emissions from the spray applied surface coating operations with booths (EP01S7 through EP01S8) and exhaust fan(s). [Special Condition 3.A.]
   a) The permittee shall demonstrate negative pressure at booths EP01S7 and EP01S8. [Special Condition 3.B.]
      i) The permittee does not have to demonstrate negative pressure if booths EP01S7 and EP01S8 are not in operation. [Special Condition 3.B.]
   b) The permittee shall operate each surface coating booth's exhaust fan(s) at all times when surface coating is occurring in each booth. [Special Condition 3.B.]
2) The permittee shall equip each spray booth (EP01S7 and EP01S8) with a fabric filter. [Special Condition 4.A.]
   a) The permittee shall maintain the pressure drop across each fabric filter within the design conditions specified by the manufacturer's performance warranty. [Special Condition 4.B.]
   b) The permittee shall operate and maintain the fabric filters in accordance with the manufacturer's specifications. [Special Condition 4.C.]
   c) The permittee shall keep replacement fabric filters on hand at all times. [Special Condition 4.D.]

i) The permittee shall only use replacement filters made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 4.D.]
ii) The permittee shall meet or exceed the previous filter material type and weight specifications upon replacement. [Special Condition 4.D.]
iii) The permittee shall not increase the air to cloth ratio or air to filter ratio when filter replacement is performed. [Special Condition 4.D.]

3) The permittee shall keep all solvents, paints, and cleaning solutions in sealed containers whenever the materials are not in use. [Special Condition 6]
4) The permittee shall operate no more than four powder coating electrostatic spray guns or eight liquid spray guns within any of the eight spray booths (EP-01). [Special Condition 5]

Monitoring and Recordkeeping

1) The permittee shall monitor and observe negative air flow into the booth openings at EP01S7 and EP01S8 at least once every 24 hours with visual indicators such as streamers, powder puff, smoke, or other methods preapproved by the Air Pollution Control Program. [Special Condition 3.B.]
   a) The permittee shall record 24-hour periods when spray applied surface coating is non-operational. [Special Condition 3.B.]
2) The permittee shall maintain an operating and maintenance log for the spray booth and exhaust system using Attachment I or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition, which shall include the following: [Special Condition 3.D.]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [Special Condition 3.D.]
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 3.D.]
   c) Dates of all above schedules, incidents, activities, and actions. [Special Condition 3.D.]
3) The permittee shall equip each spray booth fabric filter with a gauge or meter, which indicates the pressure drop across the control device. [Special Condition 4.B.]
   a) The permittee shall install these gauges or meters such that the Department of Natural Resources' employees may easily observe them. [Special Condition 4.B.]
4) The permittee shall measure and record the pressure drop across each fabric filter at least once every 24 hours using Attachment H or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition. [Special Condition 4.B.]
   a) The permittee shall also record 24-hour periods when spray applied surface coating is non-operational. [Special Condition 4.B.]
5) The permittee shall maintain a copy of the fabric filter manufacturer's performance warranty on site. [Special Condition 4.E.]
6) The permittee shall maintain an operating and maintenance log for each fabric filter using Attachment I or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition, which shall include the following: [Special Condition 4.F.]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [Special Condition 4.F.]
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 4.F.]

c) Dates of all above schedules, incidents, activities, and actions. [Special Condition 4.F.]

7) The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent, paint, and cleaning solution containers used with this equipment sufficient to identify the contents. [Special Condition 6]
8) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS and/or EDS for all materials used.

Reporting

1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
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 4 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Emission Unit	Description	Control
EP01S1	Paint Booth, Station 1 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S2	Paint Booth, Station 2 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S3	Paint Booth, Station 3 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S4	Paint Booth, Station 4 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S5	Paint Booth, Station 5 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S6	Paint Booth, Station 6 Stack, 16.75 gal/hr (2000)	Paint Arrestor Filter
EP01S7	Paint Booth, Station 7 Stack, 16.75 gal/hr (Under Construction)	Paint Arrestor Filter
EP01S8	Paint Booth, Station 8 Stack, 16.75 gal/hr (Under Construction)	Paint Arrestor Filter

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 60 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 J and K 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 5 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters		
Emission Unit	Description	Control
EP03	Pre-Treatment Process Heater, 3 Stage Phosphate Washer/Coater Operation, Natural Gas, 0.75 MMBtu/hr (2000)	N/A

Operating Limitations

1) The permittee shall meet the following requirements at all times the affected unit is operating: [§63.7500(a)]
   a) The permittee must operate and maintain any affected source, 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)]

b) The permittee must complete a tune-up every 5 years as specified in §63.7540. [§63.7500(e)]
   i) As provided in §63.6(g), the US EPA may approve use of an alternative to this work practice standards §63.7500. [§63.7500(b)]

c) The permittee must comply with these standards at all times the affected unit is operating, except during periods of startup and shutdown during which time the permittee must comply only with the following: [§63.7500(f)]
   i) During startup:
      (1) The permittee must operate all CMS. [Item 5, Table 3]
      (2) The permittee must use the following clean fuel: Natural gas [Item 5, Table 3]
      (3) The permittee has the option of complying using either of the following work practice standards. [Item 5, Table 3]
         (a) If the permittee chose to comply using definition (1) of "startup" in §63.7575, once the permittee starts firing fuels that are not clean fuels, the permittee must vent emissions to the main stack(s) and engage all of the applicable control devices. Startup ends when steam or heat is supplied for any purpose [Item 5, Table 3]
         (b) If the permittee chose to comply using definition (2) of "startup" in §63.7575, once the permittee starts to feed fuels that are not clean fuels, the permittee must vent emissions to the main stack(s) and engage all of the applicable control devices so as to comply with the emission limits within 4 hours of start of supplying useful thermal energy. The permittee must engage and operate PM control within one hour of first feeding fuels that are not clean fuels. The permittee must start all applicable control devices as expeditiously as possible, but, in any case, when necessary to comply with other standards applicable to the source by a permit limit or a rule other than subpart DDDDD that require operation of the control devices. The permittee must develop and implement a written startup and shutdown plan, as specified in §63.7505(e). [Item 5, Table 3]
      (4) The permittee must comply with all applicable emission limits at all times except during startup periods at which time the permittee must meet this work practice. [Item 5, Table 3]
      (5) The permittee must collect monitoring data during periods of startup, as specified in §63.7535(b). [Item 5, Table 3]
      (6) The permittee must keep records during periods of startup. [Item 5, Table 3]
      (7) The permittee must provide reports concerning activities and periods of startup, as specified in §63.7555. [Item 5, Table 3]
   ii) During shutdown:
      (1) The permittee must operate all CMS. [Item 6, Table 3]
      (2) While firing fuels that are not clean fuels during shutdown, the permittee must vent emissions to the main stack(s) and operate all applicable control devices when necessary to comply with other standards applicable to the source that require operation of the control device. [Item 6, Table 3]
      (3) If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels,

distillate oil, syngas, ultra-low sulfur diesel, refinery gas, and liquefied petroleum gas. [Item 6, Table 3]

(4) The permittee must comply with all applicable emissions limits at all times except for shutdown periods conforming to this work practice. [Item 6, Table 3]
(5) The permittee must collect monitoring data during periods of shutdown, as specified in §63.7535(b). [Item 6, Table 3]
(6) The permittee must keep records during periods of shutdown. [Item 6, Table 3]
(7) The permittee must provide reports concerning activities and periods of shutdown, as specified in §63.7555. [Item 6, Table 3]

Tune-Up Requirements[5]

1) The permittee must conduct each 5 year tune-up specified in §63.7540(a)(12) no more than 61 months after the previous tune-up. [§63.7515(d)]
2) The permittee must conduct a tune-up of the 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)]
   a. As applicable, the permittee must 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. The permittee must 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. The permittee must 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). [§63.7540(a)(10)(iii)]
   d. The permittee must 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. The permittee must 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. [§63.7540(a)(10)(v)]
   f. The permittee must 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 process heater; [§63.7540(a)(10)(vi)(A)]

[5] The permittee chooses to completely replace the process heaters on a yearly basis and thus may not have records of the five year tune-up requirements of MACT DDDDD. The permittee is required to keep a log of these replacement dates and process heater model numbers as well as resubmit the initial notification. If the permittee should decide to keep the process heaters for a period of five years or greater, the permittee must comply with the five year tune-up requirements of this permit condition.

ii. A description of any corrective actions taken as a part of the tune-up; and [§63.7540(a)(10)(vi)(B)]

3) If the unit is not operating on the required date for a tune-up, the permittee must conduct the tune-up within 30 calendar days of startup. [§63.7540(a)(13)]

Recordkeeping and Reporting

1) The permittee must submit the report in Table 9 to MACT DDDDD. [§63.7550(a)]

Table 9 in 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).

2) The permittee may submit only a five-year compliance report with the following information: [§63.7550(b)]
   a. The first compliance report must cover the period beginning on the compliance date that is specified for the 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)]
3) A compliance report must contain the following information depending on how the permittee 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)]
4) 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 (https://www.epa.gov/chief),

once the XML schema is available. If the reporting form specific to MACT DDDDD 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.

5) The permittee shall submit copies of these reports to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov
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 MACT DDDDD, 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.

Permit Condition 6 10 CSR 10-6.060 Construction Permits Required Construction Permit 012018-003, Issued January 17th, 2018		
Emission Unit	Description	Control
EP04	Burn Off Oven, Natural Gas, 0.8 MMBtu/hr (2018)	N/A

Operational Limitations

1) The permittee shall exclusively use the burn off oven to remove paint/residue from tools/metal parts. [Special Condition 4.A.]
   a) The permittee shall exclusively fuel the oven with natural gas. [Special Condition 4.A.]
   b) The permittee shall not introduce PVC, chlorinated, or hazardous materials into the oven. [Special Condition 4.B.]
   c) The permittee shall operate the burn off oven with an afterburner/secondary combustion chamber [Special Condition 4.C.]
      i) The permittee shall maintain a temperature of at least 1,400 degrees Fahrenheit in the secondary combustion chamber. [Special Condition 4.C.]

Monitoring and Recordkeeping

1) The permittee shall operate the burn off oven with a digital gauge that continuously indicates the temperature in the secondary combustion chamber. [Special Condition 4.D.]
2) The permittee shall monitor and record the secondary combustion oven temperature at least twice per batch cycle while operating using Attachment L or an equivalent form, such as an electronic

form, approved by the Air Pollution Control Program to demonstrate compliance with this permit condition. [Special Condition 4.D.]
   a) The permittee shall record the batch cycle start and stop times. [Special Condition 4.D.]
   b) The permittee shall record the times that the temperature is recorded. [Special Condition 4.D.]
3) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS and/or EDS for all materials used.

Reporting

1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
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 7 10 CSR 10-6.261 Control of Sulfur Dioxide Emissions		
Emission Unit	Description	Control
EP02	Drying Oven Heater, Natural Gas, 1.3 MMBtu/hr (2000)	N/A
EP03	Pre-Treatment Process Heater, 3 Stage Phosphate Washer/Coater Operation, Natural Gas, 0.75 MMBtu/hr (2000)	N/A
EP04	Burn Off Oven, Natural Gas, 0.8 MMBtu/hr (2018)	N/A

Recordkeeping

1) Individual units fueled exclusively with natural gas (as defined in 40 CFR 72.2) are determined to be in compliance with this rule by complying with the record keeping requirements. [6.261(1)(A)]
2) The permittee shall determine compliance using fuel delivery records. [6.261(4)(C)]
3) The permittee must maintain a record of fuel deliveries. [6.261(4)(C)]
4) The permittee must maintain the following 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): [6.261(4)(C)]
   a) The name, address, and contact information of the fuel supplier [6.261(4)(C)(1)]
   b) The type of fuel [6.261(4)(C)(2)]
   c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur [6.261(4)(C)(4)]
   d) The heating value of the fuel [6.261(4)(C)(5)]
5) The permittee must furnish the Director all data necessary to determine compliance status. [6.261(4)(G)]
6) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
7) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS and/or EDS for all materials used.

8) 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.

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 M, 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 10-6.250 Asbestos Abatement Projects
Certification, Accreditation, and Business Exemption Requirements
This is a State Only permit requirement.
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.

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/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

40 CFR Part 63 Subpart MMMM - *National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*
The permittee uses the Emission Rate Without Controls under Subpart MMMM. However it is permitted for the permittee to deviate and use the Compliant Materials Option or the Emission Rate With Add-On Controls Option. If the permittee chooses to do this, the associated requirements within Subpart MMMM will apply.

40 CFR Part 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*
The permittee chooses to replace their process heaters every year. If the permittee chooses to keep any unit longer than 5 years, the permittee will have to comply with the tune-up requirements for that unit.

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 the Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. 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/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, 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/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, 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/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, 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, who replaced Scott Beckwith, President, as of the time of submission on September 28th, 2017. 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 – Table of HAPs and SMAL

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CARBARYL	63-25-2	10	V	Y	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
ACETOPHENONE	98-86-2	1		Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CATECHOL	120-80-9	5		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
ACROLEIN	107-02-8	0.04		Y	N	CHLORAMBEN	133-90-4	1		Y	Y	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
ACRYLAMIDE	79-06-1	0.02		Y	N	CHLORDANE	57-74-9	0.01		Y	Y	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
ACRYLIC ACID	79-10-7	0.6		Y	N	CHLORINE	7782-50-5	0.1		N	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
ACRYLONITRILE	107-13-1	0.3		Y	N	CHLOROACETIC ACID	79-11-8	0.1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
AMINOBIPHENYL, [4-]	92-67-1	1	V	Y	N	CHLOROBENZENE	108-90-7	10		Y	N	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
ANILINE	62-53-3	1		Y	N	CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	DIMETHYL PHTHALATE	131-11-3	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLOROFORM	67-66-3	0.9		Y	N	DIMETHYL SULFATE	77-78-1	0.1		Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
ANTIMONY COMPOUNDS		5	H	N	Y	CHLOROPRENE	126-99-8	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHROMIUM COMPOUNDS		5	L	N	Y	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	CHRYSENE	218-01-9	0.01	V	Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	COBALT COMPOUNDS		0.1	M	N	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	COKE OVEN EMMISIONS	8007-45-2	0.03	N	Y	N	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
ASBESTOS	1332-21-4	0	A	N	Y	CRESOL, [META-]	108-39-4	1	B	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
BENZENE	71-43-2	2		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
BENZIDINE	92-87-5	0.0003	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CUMENE	98-82-8	10		Y	N	ETHYL ACRYLATE	140-88-5	1		Y	N
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N	ETHYL BENZENE	100-41-4	10		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y	ETHYL CHLORIDE	75-00-3	10		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N	ETHYLENE GLYCOL	107-21-1	10		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2				
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DIAZOMETHANE	334-88-3	1		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N
BERYLLIUM SALTS		2E-05	J	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DIOXINS/FURANS		6E-07	D,V	Y	N	ETHYLENE OXIDE	75-21-8	0.1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DIBENZOFURAN	132-64-9	5	V	Y	N	ETHYLENE THIOUREA	96-45-7	0.6		Y	Y
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	FORMALDEHYDE	50-00-0	2		Y	N
BROMOFORM	75-25-2	10		Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y	GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	HEPTACHLOR	76-44-8	0.02		Y	N
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y	HEXACHLOROBENZENE	118-74-1	0.01		Y	N
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N	HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N
CAPROLACTAM (Delisted)	105-60-2					DICHLOROMETHANE	75-09-2	10		N	N	HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N
CAPTAN	133-06-2	10		Y	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N
HEXAMETHYLENE,-1,6-DIISOCYANATE	822-06-0	0.02		Y	N
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N
HEXANE, [N-]	110-54-3	10		Y	N
HYDRAZINE	302-01-2	0.004		N	N
HYDROGEN CHLORIDE	7647-01-0	10		N	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N
HYDROQUINONE	123-31-9	1		Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N
ISOPHORONE	78-59-1	10		Y	N
LEAD COMPOUNDS		0.01	Q	N	Y
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N
MALEIC ANHYDRIDE	108-31-6	1		Y	N
MANGANESE COMPOUNDS		0.8	R	N	Y
MERCURY COMPOUNDS		0.01	S	N	N
METHANOL	67-56-1	10		Y	N
METHOXYCHLOR	72-43-5	10	V	Y	Y
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N
METHYL CHLORIDE	74-87-3	10		Y	N
METHYL ETHYL KETONE (Delisted)	78-93-3				
METHYL HYDRAZINE	60-34-4	0.06		Y	N
METHYL IODIDE	74-88-4	1		Y	N
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N
METHYL ISOCYANATE	624-83-9	0.1		Y	N
METHYL METHACRYLATE	80-62-6	10		Y	N
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N
METHYLCYCLCOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N
MINERAL FIBERS		0	T	N	Y
NAPHTHALENE	91-20-3	10	V	Y	N
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y
NICKEL COMPOUNDS		1	U	N	Y
NICKEL REFINERY DUST		0.08	U	N	Y
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y
NITROBENZENE	98-95-3	1		Y	N
NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N
NITROPHENOL, [4-]	100-02-7	5		Y	N
NITROPROPANE, [2-]	79-46-9	1		Y	N
NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N
NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N
NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N
OCTACHLORONAPTHALENE	2234-13-1	0.01	V	Y	N
PARATHION	56-38-2	0.1		Y	Y
PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y
PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N
PENTACHLOROPHENOL	87-86-5	0.7		Y	N
PHENOL	108-95-2	0.1		Y	N
PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N
PHOSGENE	75-44-5	0.1		Y	N
PHOSPHINE	7803-51-2	5		N	N
PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N
PHTHALIC ANHYDRIDE	85-44-9	5		Y	N
POLYCYLIC ORGANIC MATTER		0.01	V	Y	N
PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y
PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N
PROPIONALDEHYDE	123-38-6	5		Y	N
PROPOXUR [BAYGON]	114-26-1	10		Y	Y
PROPYLENE OXIDE	75-56-9	5		Y	N
PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N
QUINOLINE	91-22-5	0.006		Y	N
QUINONE	106-51-4	5		Y	N
RADIONUCLIDES		Note 1	Y	N	Y
SELENIUM COMPOUNDS		0.1	W	N	Y
STYRENE	100-42-5	1		Y	N
STYRENE OXIDE	96-09-3	1		Y	N
TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y
TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N
TETRACHLOROETHYLENE	127-18-4	10		N	N
TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N
TOLUENE	108-88-3	10		Y	N
TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N
TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N
TOXAPHENE	8001-35-2	0.01		Y	N
TRICHLOROBENZENE, [1,2,4-]	120-82-1	10		Y	N
TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N
TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N
TRICHLOROETHYLENE	79-01-6	10		Y	N
TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N
TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N
TRIETHYLAMINE	121-44-8	10		Y	N
TRIFLURALIN	1582-09-8	9		Y	Y
TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
VINYL ACETATE	108-05-4	1		Y	N
VINYL BROMIDE	593-60-2	0.6		Y	N
VINYL CHLORIDE	75-01-4	0.2		Y	N
XYLENE, [META-]	108-38-3	10	G	Y	N
XYLENE, [ORTHO-]	95-47-6	10	G	Y	N
XYLENE, [PARA-]	106-42-3	10	G	Y	N
XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N

Legend

Group ID	Aggregate Group Name
A	Asbestos
B	Cresols/Cresylic Acid (isomers and mixtures)
C	2,4 - D, Salts and Esters
D	Dibenzofurans, Dibenzodioxins
E	4, 6 Dinitro-o-cresol, and Salts
F	Lindane (all isomers)
G	Xylenes (all isomers and mixtures)
H	Antimony Compounds
I	Arsenic Compounds
J	Beryllium Compounds
K	Cadmium Compounds
L	Chromium Compounds
M	Cobalt Compounds
N	Coke Oven Emissions
O	Cyanide Compounds
P	Glycol Ethers
Q	Lead Compounds (except elemental Lead)
R	Manganese Compounds
S	Mercury Compounds
T	Fine Mineral Fibers
U	Nickel Compounds
V	Polycyclic Organic Matter
W	Selenium Compounds
X	Polychlorinated Biphenyls (Aroclors)
Y	Radionuclides

Notes

Note 1	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million

Attachment B – Alternative Materials

Alternate Coating Name	Date First Used	Date Last Used	VOC Percent Content[6]	HAP Name	Percent HAP Content	Percent Solids Content	Included in Attachment C (Y/N)	Included in Attachment D and E (Y/N)	Included in Attachment F (Y/N)

[6] The permittee shall then use the highest VOC, HAP, and particulate concentrations listed on the material's SDS sheet

Attachment C - VOC Compliance Worksheet

This sheet covers the period from _____ to _____.
(month, year) (month, year)

This section applies to the entire installation					
Column 1[7]	Column 2	Column 3	Column 4	Column 5 (a)	Column 6 (b)
Material Used (name, type)	Amount of material used (include units)	Density of material used (lbs/gal) obtained from SDS and/or EDS	VOC content (%) obtained from SDS and/or EDS	VOC emissions (tons)	VOC emissions during startup, shutdown, and malfunction (tons)
(c) Total monthly natural gas usage in from all combustion sources (scf):					
(d) Total monthly VOC emissions from startup, shutdown, and malfunction (tons):					
(e) Total monthly VOC emissions from Natural Gas Combustion (tons):					
(f) Total VOC emissions calculated for this month (tons):					
(g) 12-month rolling VOC emissions total from previous month's worksheet (tons):					
(h) Monthly VOC emissions total from previous year's worksheet (tons):					
(i) Current 12-month rolling total of VOC emissions (tons): [(f)+(g)-(h)]					

Instructions:
(a) Choose appropriate VOC calculation method for units reported:
1. If usage is in tons: [Column 2] x [Column 4] = [Column 5]
2. If usage is in pounds: [Column 2] x [Column 4] x [0.0005] = [Column 5]
3. If usage is in gallons: [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5]

Note: For [Column 4], if VOC content is in lb/gal, calculate the value for [Column 4] by dividing the lb/gal VOC content by the lb/gal density of the coating. For [Column 4], if the SDS and/or EDS has a range for VOC content percent, the permittee shall use the highest value in the range.
(b) Summation of all VOC emissions from the paint booths during startup, shutdown, and malfunction (tons)
(c) Total natural gas throughput from all natural gas sources (EP-02, EP-03, EP-04) in standard cubic feet (scf)
(d) Summation of all VOC emissions from all natural gas sources during startup, shutdown, and malfunction (tons)
(e) Natural Gas VOC emissions = [Row (c)] / [10^6 scf per MMscf] x [5.5 lb VOC per MMscf obtained from AP-42 Section 1.4] x [0.0005] + [Row (d)]
(f) Summation of all VOC emissions in Column 5, Column 6, and Row (e).
(g) 12-month rolling VOC emissions total from previous month's worksheet (tons).
(h) Monthly VOC emissions total from previous year's worksheet (tons).
(i) Calculate the new 12-month rolling VOC emissions total. **A total of less than 250.0 tons per year indicates compliance.** The installation is required to include startup, shutdown, and malfunction VOC emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 towards compliance with this limit.

[7] Alternate materials from attachment B should be included in this table

Attachment D – PM_{10} Compliance Worksheet

This sheet covers the period from _____ to _____.
(month, year) (month, year)

This section applies to the entire installation					
Column 1[8]	Column 2	Column 3	Column 4	Column 5 (a)	Column 6 (b)
Material Used (name, type)	Amount of material used (include units)	Density of material used (lbs/gal) obtained from SDS and/or EDS	Solids content (%) obtained from SDS and/or EDS	PM_{10} emissions (tons)	PM_{10} emissions during startup, shutdown, and malfunction (tons)
(c) Total monthly natural gas usage in from all combustion sources (scf):					
(d) Total monthly PM_{10} emissions from startup, shutdown, and malfunction (tons):					
(e) Total monthly PM_{10} emissions from Natural Gas Combustion (tons):					
(f) Total monthly paved haul road emissions (tons)					
(g) Total PM_{10} emissions calculated for this month (tons):					
(h) 12-month rolling PM_{10} emissions total from previous month's worksheet (tons):					
(i) Monthly PM_{10} emissions total from previous year's worksheet (tons):					
(j) Current 12-month rolling total of PM_{10} emissions (tons): [(g)+(h)-(i)]					

Instructions:
(a) Choose appropriate controlled PM_{10} calculation method for units reported:
For liquid (volatile) based coats use the following equations:
1) If usage is in tons: [Column 2] x [Column 4] x [0.70] x [0.025] = [Column 5]
2) If usage is in pounds: [Column 2] x [Column 4] x [0.70] x [0.025] x [0.0005] = [Column 5]
3) If usage is in gallons: [Column 2] x [Column 3] x [Column 4] x [0.70] x [0.025] x [0.0005] = [Column 5]
For powder based coats use the following equations:
1) If usage is in tons: [Column 2] x [Column 4] x [0.025] = [Column 5]
2) If usage is in pounds: [Column 2] x [Column 4] x [0.025] x [0.0005] = [Column 5]
3) If usage is in gallons: [Column 2] x [Column 3] x [Column 4] x [0.025] x [0.0005] = [Column 5]
Note: For powder coats, unless the SDS and/or EDS sheet explicitly states that volatiles exist within the powder coat and therefore a solids content (%) can be determined, assume the powder coat is 100% solids where [Column 4] = 100%. If the SDS and/or EDS includes a range for the solids content percent, use the highest value in the range.
(b) Summation of all PM_{10} emissions from the paint booths during startup, shutdown, and malfunction (tons)
(c) Total natural gas throughput from all combustion sources in standard cubic feet (scf)
(d) Summation of all PM_{10} emissions from all combustion sources during startup, shutdown, and malfunction (tons)
(e) Natural Gas PM_{10} emissions = [Row (b)] / [10^6 scf per MMscf] x [7.6 lb PM_{10} per MMscf obtained from AP-42 Section 1.4] x [0.0005]
(f) Monthly PM_{10} emissions from the paved haul road shall be recorded in one of two ways:
1) Record a constant 6E-06 tons of PM_{10} each month (equivalent to the average maximum monthly haul road PM_{10} emissions).

[8] Alternate materials from attachment B should be included in this table

Attachment D – PM_{10} Compliance Worksheet (Continued)

2) Record the tons of metal brought to the installation and multiply that by 1.03E-07 tons PM_{10} per ton of metal material.
(g) Summation of PM_{10} emissions in Column 5, Column 6, Row (e), and Row (f).
(h) 12-month rolling PM_{10} emissions total from previous month's worksheet (tons).
(i) Monthly PM_{10} emissions total from previous year's worksheet (tons).
(j) Calculate the new 12-month rolling PM_{10} emissions total. **A total of less than 15.0 tons per year indicates compliance.** The installation is required to include the startup, shutdown, and malfunction PM_{10} emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 towards compliance with this limit.

Note 1: The [0.70] factor accounts for 70% of total particulate being PM_{10} for liquid coats. The [0.025] factor above accounts for the 100% capture, 90% filter efficiency, and 25% overspray such that 2.5% of solid particulate will escape the booth as emissions. During SSM periods a factor of [0.25] shall be used instead which accounts for 100% capture, 0% control, and 25% overspray, such that 25% of solid particulate will escape the booths as emissions.

Attachment E – $PM_{2.5}$ Compliance Worksheet

This sheet covers the period from _____ to _____.
(month, year) (month, year)

This section applies to the entire installation					
Column 1[9]	Column 2	Column 3	Column 4	Column 5 (a)	Column 6 (b)
Material Used (name, type)	Amount of material used (include units)	Density of material used (lbs/gal) obtained from SDS and/or EDS	Solids content (%) obtained from SDS and/or EDS	$PM_{2.5}$ emissions (tons)	$PM_{2.5}$ emissions during startup, shutdown, and malfunction (tons)
(c) Total monthly natural gas usage in from all combustion sources (scf):					
(d) Total monthly $PM_{2.5}$ emissions from startup, shutdown, and malfunction (tons):					
(e) Total monthly $PM_{2.5}$ emissions from Natural Gas Combustion (tons):					
(f) Total monthly paved haul road emissions (tons)					
(g) Total $PM_{2.5}$ emissions calculated for this month (tons):					
(h) 12-month rolling PM_{10} emissions total from previous month's worksheet (tons):					
(i) Monthly $PM_{2.5}$ emissions total from previous year's worksheet (tons):					
(j) Current 12-month rolling total of PM_{10} emissions (tons): [(g)+(h)-(i)]					

Instructions:
(a) Choose appropriate controlled $PM_{2.5}$ calculation method for units reported:
For liquid (volatile) based coats use the following equations:
1) If usage is in tons: [Column 2] x [Column 4] x [0.16] x [0.025] = [Column 5]
2) If usage is in pounds: [Column 2] x [Column 4] x [0.16] x [0.025] x [0.0005] = [Column 5]
3) If usage is in gallons: [Column 2] x [Column 3] x [Column 4] x [0.16] x [0.025] x [0.0005] = [Column 5]
For powder based coats use the following equations:
1) If usage is in tons: [Column 2] x [Column 4] x [0.025] = [Column 5]
2) If usage is in pounds: [Column 2] x [Column 4] x [0.025] x [0.0005] = [Column 5]
3) If usage is in gallons: [Column 2] x [Column 3] x [Column 4] x [0.025] x [0.0005] = [Column 5]
Note: For powder coats, unless the SDS and/or EDS sheet explicitly states that volatiles exist within the powder coat and therefore a solids content (%) can be determined, assume the powder coat is 100% solids where [Column 4] = 100%. If the SDS and/or EDS includes a range for the solids content percent, use the highest value in the range.
(b) Summation of all $PM_{2.5}$ emissions from the paint booths during startup, shutdown, and malfunction (tons)
(c) Total natural gas throughput from all combustion sources in standard cubic feet (scf)
(d) Summation of all $PM_{2.5}$ emissions from all combustion sources during startup, shutdown, and malfunction (tons)
(e) Natural Gas $PM_{2.5}$ emissions = [Row (b)] / [10^6 scf per MMscf] x [7.6 lb PM_{10} per MMscf obtained from AP-42 Section 1.4] x [0.0005]
(f) Monthly $PM_{2.5}$ emissions from the paved haul road shall be recorded in one of two ways:
1) Record a constant 1.5E-06 tons of $PM_{2.5}$ each month (equivalent to the average maximum monthly haul road PM_{10} emissions).

[9] Alternate materials from attachment B should be included in this table

Attachment E – $PM_{2.5}$ Compliance Worksheet (Continued)

2) Record the tons of metal brought to the installation and multiply that by 5.29E-08 tons $PM_{2.5}$ per ton of metal material.
(g) Summation of $PM_{2.5}$ emissions in Column 5, Column 6, Row (e), and Row (f).
(h) 12-month rolling $PM_{2.5}$ emissions total from previous month's worksheet (tons).
(i) Monthly $PM_{2.5}$ emissions total from previous year's worksheet (tons).
(j) Calculate the new 12-month rolling PM_{10} emissions total. **A total of less than 10.0 tons per year indicates compliance.** The installation is required to include the startup, shutdown, and malfunction $PM_{2.5}$ emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 towards compliance with this limit.

Note 1: The [0.16] factor accounts for 16% of total particulate being $PM_{2.5}$ for liquid coats. The [0.025] factor above accounts for the 100% capture, 90% filter efficiency, and 25% overspray such that 2.5% of solid particulate will escape the booth as emissions. During SSM periods a factor of [0.25] shall be used instead which accounts for 100% capture, 0% control, and 25% overspray, such that 25% of solid particulate will escape the booths as emissions.

Attachment F – Individual HAPs Compliance Worksheet

HAP Name:_____ CAS No.:_____ SMAL(tpy)[10]_____
This sheet covers the month of _____ in the year _____

This section applies to the entire installation				
Column 1[11]	Column 2	Column 3	Column 4	Column 5 (a)
Material Used (name, type)	Amount of material used (include units)	Density of material used (lbs/gal)	HAP content (%)	HAP emissions (tons)
(b) Total monthly individual HAP emissions from Natural Gas Combustion using emission factors found in Attachment G (tons):				
(c) Total HAP emissions calculated for this month (tons):				
(d) 12-month HAP emissions total from previous month's worksheet (tons):				
(e) Monthly HAP emissions total from previous year's worksheet (tons):				
(f) Current 12-month total of HAP emissions (tons): [(c)+(d)-(e)]				

Instructions:
(a) **For HAPs listed as VOC ('Y') in Attachment A, choose the appropriate calculation method for units reported:**
1. If usage is in tons: [Column 2] x [Column 4] = [Column 5]
2. If usage is in pounds: [Column 2] x [Column 4] x [0.0005] = [Column 5]
3. If usage is in gallons: [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5]

For HAPs listed as PM ('Y') in Attachment A, choose the appropriate calculation method for units reported:
1. If usage is in tons: [Column 2] x [Column 4] x [0.025] = [Column 5]
2. If usage is in pounds: [Column 2] x [Column 4] x [0.025] x [0.0005] = [Column 5]

(b) Attachment G includes individual and total emission factors for HAPs from natural gas
(c) Summation of Column 5.
(d) 12-month HAP emissions total from previous month's worksheet (tons).
(e) Monthly HAP emissions total from previous year's worksheet (tons).
(f) Calculate the new 12-month HAP emissions total. **A total of less than the SMAL indicates compliance.** The installation is required to include startup, shutdown, and malfunction individual HAP emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 towards this limit.

Note 1: The [0.025] factor above accounts for the 100% capture, and 90% filter efficiency, and 25% overspray such that 2.5% of solid particulate will escape the booth as emissions. During SSM periods a factor of [0.25] shall be used instead. If the SDS and/or EDS includes a range for the HAPs content percent, use the highest value in the range.

[10] The SMAL can be found in attachment A
[11] Alternate materials from Attachment B should be included in this table

Attachment G – Natural Gas Emission Factors

HAPs	Emission Factors ($lb/10^6$ scf)[12]
POM aggregate group	6.98E-04
2-Methylnaphthalene	2.40E-05
3-Methylchloranthrene	1.80E-06
7,12-Dimethylbenzanthracene	1.60E-05
Acenaphthene	1.80E-06
Acenaphthylene	1.80E-06
Anthracene	2.40E-06
Benzanthracene	1.80E-06
Benzene	2.10E-03
Benzo(a)pyrene	1.20E-06
Benzo(b)fluoranthene	1.80E-06
Benzo(g,h,i)perylene	1.20E-06
Benzo(k)fluoranthene	1.80E-06
Butane	2.10E+00
Chrysene	1.80E-06
Dibenzo(a,h)anthracene	1.20E-06
Dichlorobenzene	1.20E-03
Ethane	3.10E+00
Fluoranthene	3.00E-06
Fluorene	2.80E-06
Formaldehyde	7.52E-02
Hexane	1.80E+00
Indeno(1,2,3-cd)pyrene	1.80E-06
Naphthalene	6.08E-04
Pentane	2.60E+00
Phenanathrene	1.70E-05
Propane	1.60E+00
Pyrene	5.01E-06
Toluene	3.40E-03
Arsenic	2.00E-04
Barium	4.40E-03
Beryllium	1.20E-05
Cadmium	1.10E-03
Chromium	1.40E-03
Cobalt	8.41E-05
Copper	8.52E-04
Manganese	3.79E-04
Mercury	2.60E-04
Molybdenum	1.10E-03
Nickel	2.10E-03
Selenium	2.40E-05
Vanadium	2.30E-03
Zinc	2.90E-02
Total	**1.13E+01**

[12] Emission factors found in AP-42 Section 1.4

Attachment H – Fabric Filter Pressure Drop Log

Emission Point # and Unit Description: ______________________________________

Date	Pressure Drop (inches water)	Within manufacturer's specifications? (Yes/No)

Attachment I – Operating and Maintenance Log

Emission Unit # _____

Date/Time	Inspection/ Maintenance Activities	Malfunction Activities					
		Malfunction	Impact	Duration	Cause	Action	Initials

Attachment J – Method 22 Visible Emissions Observations

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 K – Method 9 Visible Emissions Observations

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:		

Minute	Seconds				1-minute Avg. % Opacity[13]	6-minute Avg. % Opacity[14]	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity)[15]								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									

[13] 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
[14] 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
[15] Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

Attachment L – Secondary Combustion Oven Temperature Log

Date	Batch Cycle Start Time	Batch Cycle Stop Time	Time Temperature Recorded	Secondary Combustion Oven Temperature	Initials

Attachment M – Fugitive Emission Observations

Date	Time	Visible Emissions Beyond Boundary		If There Are Visible Emissions Beyond the Property Boundary		Initial
		No	Yes	Cause	Corrective Action	

STATEMENT OF BASIS

Installation Description

Architectural Systems 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.

Aluminum extrusions first receive a dip in a cleaning solution (caustic) then a rinse in a dip tank. The extrusions are then dipped into a phosphate solution and go through two additional rinse steps. The pretreatment cleaning and the phosphate coating and rinsing processes are a wet process. The emissions (EP-03) from this source consists of the natural gas combustion emissions from the three process heaters each rated at 0.25 MMBtu/hr.

EP01 is a long spray booth split into eight stations which consists of a total of eight stacks, S1 through S8. Aluminum extrusions enter the paint booth and proceed through the booths so coatings can be 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.

An electrostatic paint system is utilized to minimize overspray. A percent transfer efficiency of 75 is used for the spray guns. Since the existing spray booths are fully enclosed, they were given a default 100% particulate capture efficiency. A paint arrestor filter is given a value of 90 percent for control of particulate matter.

The extrusions then proceed to the drying oven for final curing of the applied coatings. The natural gas fired drying oven (EP02) is rated at 1.3 MMBtu/hr. The extrusions are then sent to the burn off oven (EP03) to burn the overspray coatings. Since the last operating permit, the burn off oven was replaced with a newer model, rated at 0.8 MMBtu/hr.

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 and VOCs. 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 [16]	Reported Emissions				
		2018	2017	2016	2015	2014
Particulate Matter ≤ Ten Microns (PM_{10})	<15	4.66	0.02	0.02	0.02	0.02
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)	<10	4.66	0.02	0.02	0.02	0.02
Sulfur Oxides (SO_x)	0.01	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO_x)	1.22	0.65	0.54	0.54	0.51	0.60
Volatile Organic Compounds (VOC)	<250	29.95	19.89	35.43	32.27	47.92
Carbon Monoxide (CO)	1.03	0.54	0.46	0.46	0.43	0.51
Hazardous Air Pollutants (HAPs)	304.92	0.00	0.00	0.00	13.06	0.00

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 October 5, 2017;
2) 2018 Emissions Inventory Questionnaire, received March 18, 2019; and
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

[16] Each emission unit was evaluated at 8760 hours a year. This does not include the haul road. The emission rates are all uncontrolled with the exception of $PM_{2.5}$, PM_{10} and VOC, which are emission limitations from Permit Condition PW1.

CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
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. This regulation does not apply to any of the sulfur emitting units (EP02, EP03, and EP04) because they are natural gas fired. [6.260(1)(A)2.]

CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*
This installation is exempt from this regulation because all of its indirect heating sources combust only natural gas, as stated in 6.405(1)(E).

Construction Permit History

1) Construction Permit No. 012018-003A, Issued on August 23, 2018
   a) This permit approved the construction of 2 booths which will operate similarly to the six previously permitted spray booths.
   b) The permit contained the following special conditions:
      i) VOC, Particulate, and HAP Emission Limitations
         (1) This was included in Permit Condition PW1
      ii) Capture Device Requirement- Spray Booths (EP01/S7 and EP01/S8)
         (1) This was included in Permit Condition 3
      iii) Control Device Requirement - Fabric Filters (EP01/S7, EP01/S8)
         (1) This was included in Permit Condition 3
      iv) Powder Coating Spray Booth Requirement
         (1) This was included in Permit Condition 3
      v) Operational Requirement - Solvents/cleaning solutions
         (1) This was included in Permit Condition 3
      vi) Use of Alternative Coatings in Spray Booth (EP01 powder coating; EP01/S7 and EP-01/S8 solvent based coating)
         (1) This was included in Permit Condition PW1
      vii) Record Keeping and Reporting Requirements
         (1) This was included in Permit Condition 3 and PW1

2) Construction Permit No. 012018-003, Issued on January 17, 2018
   a) This permit approved the installation to replace its 0.2 MMBtu/hr burn off oven with a new 0.8 MMBtu/hr burn off oven.
   b) The permit contained the following special conditions:
      i) VOC and $PM_{2.5}$ Emission Limitations
         (1) This was superseded in Construction Permit No. 012018-003A
      ii) Use of Alternative Materials
         (1) This was superseded in Construction Permit No. 012018-003A
      iii) Burn Off Oven Operational Requirement (EP04)
         (1) This was included in Permit Condition 6
      iv) Powder Coating Spray Booth Requirement
         (1) Construction Permit No. 012018-003A contains a similar special condition to this and was used instead as a permit streamlining effort.
      v) Record Keeping and Reporting Requirements

(1) This was included in Permit Condition 6

3) Construction Permit No. 072008-010, Issued on July 28, 2008
   a) This permit was a condition of remedial enforcement action since the plant had been in operation since 2000.
   b) The permit contained the following special conditions:
      i) Emission Limitation for Volatile Organic Compounds (VOCs)
         (1) This was superseded in Construction Permit No. 012018-003
      ii) Emission Limitation for Hazardous Air pollutants (HAPs)
         (1) This special condition required 40 CFR Part 63, Subpart MMMM to be applied
      iii) Emission Limitation for Nitrogen Oxides (NOx)
         (1) This was superseded in Construction Permit No. 012018-003
      iv) Required Operating Conditions for Spray Paint Booth Arrestor Filters
         (1) This was included in Permit Condition 2
      v) Required Operating Conditions for Thinner, Paints and Solvents
         (1) This was included in Permit Condition 2
      vi) Paved Haul Road Control
         (1) This was included in Permit Condition 2

New Source Performance Standards (NSPS) Applicability
None

Maximum Achievable Control Technology (MACT) Applicability
40 CFR Part 63 Subpart MMMM - *National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*
The installation is subject to this subpart because they operate an existing spray booth (EP01) at a surface coating facility for extruded aluminum structural components as required in §63.3881(a)(1). EP01 fell under the category for high performance coatings and the installation opted to use emission rate without controls as the means of compliance. This regulation is included in the operating permit as Permit Condition 1.

40 CFR Part 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*
The installation is subject to this subpart because they operate an existing process heater (EP03) located at a major source of HAPs as required in §63.7485. EP03 fell under the category for units designed to burn gas 1 fuels. Due to the fact that the installation replaces their process heater yearly, the installation may not have the records for the 5 year tune-up requirements, as noted in footnote 1. This subpart does not apply to the two ovens (EP02 and EP04) because they are direct fired and according to §64.7575, process heaters have to be indirectly fired. This regulation is included in the operating permit as Permit Condition 5.

40 CFR Part 63 Subpart HHHHHH - *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*
The installation is not subject to this subject due to the fact that they are major source of HAPs and this rule only applies to area sources of HAPs, per §63.11170(a).

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 CO_2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2 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 CO_2 emissions data by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations
10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
This regulation does not apply to the following the following emission points due to the corresponding citations:

Emission Unit	Description	Citation Under 6.220	Reason
EP02	Drying Oven Heater, Natural Gas, 1.3 MMBtu/hr (2000)	(1)(L)	Natural Gas Fired
EP03	Pre-Treatment Process Heater, 3 Stage Phosphate Washer/Coater Operation, Natural Gas, 0.75 MMBtu/hr (2000)	(1)(L)	Natural Gas Fired
EP04	Burn Off Oven, Natural Gas, 0.8 MMBtu/hr (2018)	(1)(L)	Natural Gas Fired
EP05	0.1 Mile Paved Haul Road	(1)(K)	Fugitive Emission Regulated by 6.170

This regulation applies to the paint booth (EP01) because it is a source of visible emissions and is cited in the operating permit under Permit Condition 4.

CSR 10-6.261, *Control of Sulfur Dioxide Emissions*
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. Only the record keeping and reporting portion of this regulation applies to the sulfur emitting units (EP02, EP03

and EP04) because they are natural gas fired. This regulation is cited in the operating permit as Permit Condition 7. [6.621(1)(A)]

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This regulation does not apply to the following the following emission points due to the corresponding exemption citations:

Emission Unit	Description	Citation Under 6.400	Reason
EP01	Eight-Station Paint Booth 16.75 gal/hr (2000)	(1)(B)15.	Subject to Federally Enforceable Control of Over 90%
EP02	Drying Oven Heater, Natural Gas, 1.3 MMBtu/hr (2000)	(3)(A)1.	Natural Gas Is Not Considered Process Weight
EP03	Pre-Treatment Process Heater, 3 Stage Phosphate Washer/Coater Operation, Natural Gas, 0.75 MMBtu/hr (2000)	(1)(B)6.	Indirect Heating
EP04	Burn Off Oven, Natural Gas, 0.8 MMBtu/hr (2018)	(3)(A)1.	Natural Gas Is Not Considered Process Weight
EP05	0.1 Mile Paved Haul Road	(1)(B)7.	Fugitive Emissions

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).

Response to Public Comments

We received comments from the Environmental Protection Agency, Region 7, on December 19, 2019. The comments are addressed in the order in which they appear within the letter(s).

Comment #1:
Monitoring and Record keeping requirement 4) in Permit Condition 2 requires the permittee to "maintain suitable, easily read, permanent markings on all solvent, paint, and cleaning solution containers used with this equipment (six (6) paint booths)." However, the monitoring and record keeping requirement does not specify the wording these permanent markings shall contain. As written, this monitoring and record keeping requirement may not be practically enforceable and the EPA recommends MoDNR specify the wording to be included in the suitable, easily read permanent markings.

Additionally, Monitoring and Record keeping requirement 7) in Permit Condition 3, also requires the permittee to "maintain suitable, easily read, permanent markings on all solvent, paint, and cleaning solution containers used with this equipment (two (2) paint booths)." However, the monitoring and record keeping requirement does not specify the wording these permanent markings shall contain. As written, this monitoring and record keeping requirement may not be practically enforceable and the EPA recommends MoDNR specify the wording to be included in the suitable, easily read permanent markings.

Response to Comment:
The Department agrees with the comments and has changed the requirements to read “The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent, paint, and cleaning solution containers used with this equipment sufficient to identify the contents.”

Comment #2:
Permit Condition 7 incorporates requirements from 10 CSR 10-6.261 – Control of Sulfur Dioxide Emissions as they apply to emission sources EP02, EP03 and EP04. However, Permit Condition 7 does not include the emission limitation(s) and the compliance demonstration(s) used to verify that the permittee meets the emission limitations. The EPA recommends MoDNR consider modifying Permit Condition 7 to include all appropriate applicable requirements from 10 CSR 10-6.261.

Response to Comment:
The Department acknowledges that Permit Condition 7 did not explicitly include emissions limitation(s) and compliance demonstration(s), and so has added “Individual units fueled exclusively with natural gas (as defined in 40 CFR 72.2) are determined to be in compliance with this rule by complying with the record keeping requirements. [6.261(1)(A)].”

Comment #3:
Permit Condition 5 incorporates requirements from 40 CFR part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and

Institutional Boilers and Process Heaters applicable to Emission Unit EP03; the Pre-Treatment Process Heater associated with a 3 Stage Phosphate Washer/Coater Operation. As stated in Operational Limitation 1) b) pursuant to §63.7500(e), the permittee must complete a tune-up every five years as specified in §63.7540; unless, as stated in Operational Limitation 1) b) i) pursuant to §63.7500(b), the EPA, as provided in §63.6(g), may approve the use of an alternative to this work practice standard. As a footnote to the Tune-Up Requirements specified in Permit Condition 5, MoDNR states "the permittee chooses to completely replace the process heaters on a yearly basis and thus may not have records of the five-year tune-up requirements of MACT DDDDD." This yearly process heater change appears to be an alternative to the work practice standards of 40 CFR part 63, Subpart DDDDD and may need EPA approval. Therefore, the EPA strongly recommends MoDNR consider the permittee include a copy of the EPA approved alternative work practice standard as an attachment to this Part 70 operating permit. Additionally, each yearly change of the process heater triggers the need to submit an initial notification, therefore, the EPA strongly recommends MoDNR consider an additional reporting requirement in Permit Condition 5 to reflect this initial notification submission requirement.

Response to Comment:
The Department views the practice of replacing process heaters every year not as an alternative to the work practice standards but instead as simply restarting the tune-up period, so no changes were made to the text. However, the Department does agree that the permittee triggers the need to submit an initial notification every time the process heaters are replaced, and the footnote has been amended to reflect this.

Comment #4:
Finally, the Responsible Official section included in Section V of this draft Part 70 indicates the application utilized in the preparation of this permit was signed by Cassie Branch, Corporate Secretary. However, the Application for Authority to Operate, in the EPA files as provided by MoDNR, is signed by Scott Beckwith, President. The EPA suggests MoDNR consider providing an explanation regarding the change in Responsible Official in the operating permit statement of basis.

Response to Comment:
The Department agrees with the comment, but has decided to include the explanation in Section V of the permit instead of the statement of basis.