



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: OP2013-012
Expiration Date: MAR 07 2018
Installation ID: 105-0006
Project Number: 2011-12-037

Installation Name and Address

Brunswick Freshwater Group - Lebanon Missouri
2900 Industrial Drive
Lebanon, MO 65536
Laclede County

Parent Company's Name and Address

Brunswick Corporation
1 Northfield Court
Lake Forest, IL 60045

Installation Description:

Brunswick Freshwater Group operates an aluminum boat manufacturing plant in Lebanon Missouri. The major operations at the installation are metal fabrication, woodworking, surface coating, adhesive application, solvent wipedown, drying ovens, and general assembly and storage of finished units. This source is considered "major" for carbon monoxide, volatile organic compounds, oxides of nitrogen and hazardous air pollutants.

MAR 08 2013

Effective Date

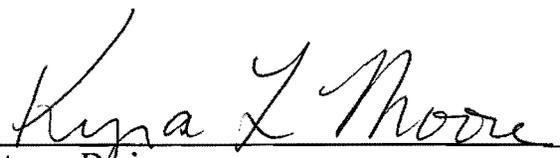

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	4
INSTALLATION DESCRIPTION	4
II. PLANT WIDE EMISSION LIMITATIONS.....	7
Permit Condition 1	8
Plant-wide 10 CSR 10-6.060, Construction Permits Required Construction Permit 072010-008A, originally issued July 22, 2010, amended October 6,2011	8
Permit Condition 2	8
Plant-wide 10 CSR 10-6.060, Construction Permits Required Construction Permit 072010-008A, originally issued July 22, 2010, amended October 6,2011	8
Permit Condition 3	8
Plant-wide 10 CSR 10-6.060, Construction Permits Required Construction Permit 1097-005, issued October 6, 1997	8
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	9
VISIBLE EMISSION SOURCES	9
Permit Condition 1	9
Visible Emission Sources 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants.....	9
VVVV SOURCES	9
Permit Condition 1	10
VVVV Sources 10 CSR 10-6.075, Maximum Achievable Control Technology 40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing	10
EU0010	18
Permit Condition 1	18
EU0010 10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes.....	18
SURFACE COATING OPERATIONS	19
Permit Condition 1	19
Surface Coating Operations 10 CSR 10-6.060, Construction Permits Required Construction Permit 1097-005, Issued September 22, 1997	19
Construction Permit 042005-008, Issued March 24, 2005.....	19
10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter.....	19
CARPET GLUING	20
Permit Condition 1	20
Carpet Gluing 10 CSR 10-6.060, Construction Permits Required Construction Permit # 1097-005, Issued September 22, 1997 10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter.....	20
DRYING OVENS	21
Permit Condition 1	21
Drying Ovens 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds.....	21
PAINTING SOURCES	22
Permit Condition 1	22
Painting Sources 10 CSR 10-6.060 Construction Permits Required	22
Construction Permit No. 072010-008A	22
IV. CORE PERMIT REQUIREMENTS	24
V. GENERAL PERMIT REQUIREMENTS.....	32
10 CSR 10-6.065(6)(E)6 REOPENING-PERMIT FOR CAUSE	37
VI. ATTACHMENTS	38
ATTACHMENT A	39
Fugitive Emission Observations	39
ATTACHMENT B	40
Opacity Emission Observations	40

ATTACHMENT C	41
Method 9 Opacity Emissions Observations	41
ATTACHMENT D	42
Inspection/Maintenance/Repair/Malfunction Log.....	42
ATTACHMENT E	43
Monthly VOC Emissions Tracking Record	43
ATTACHMENT F.....	44
Pressure Drop Records.....	44
ATTACHMENT G	45
Sample of Pre-Approved Workbook.....	45

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Brunswick Freshwater Group operates an aluminum boat manufacturing plant in Lebanon Missouri. The major operations at the installation are metal fabrication, woodworking, surface coating, adhesive application, solvent wipedown, drying ovens, and general assembly and storage of finished units.

This facility was founded in 1971, to build high value aluminum boats and canoes to fit a family's boating needs. Since then, it has developed a reputation for building high quality, yet affordable aluminum boats and pontoons to suit almost any need. Since its founding, the facility has become a technological leader in the aluminum boat market.

Reported Air Pollutant Emissions, tons per year¹					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.3	0.2	0.1	0.2	1.5
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	-- ²	--	--	--	--
Sulfur Oxides (SO _x)	--	--	--	--	--
Nitrogen Oxides (NO _x)	0.8	0.8	0.8	1.2	1.1
Volatile Organic Compounds(VOC)	34.7	41.1	25.8	64.7	92.3
Carbon Monoxide (CO)	0.7	0.1	0.1	0.2	0.2
Lead (Pb)	--	--	--	--	--
Hazardous Air Pollutants (HAPs) ³	1.7	2.2	1.4	--	--
Ammonia (NH ₃)	--	--	--	--	--

¹ All values rounded to one decimal digit.

² "--" indicates that the value was below the threshold, undetectable or otherwise not reported.

³ Some HAPs may be reported as PM₁₀ or VOC.

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	Equipment Number	Emission Point Description
EU0010		Plywood Cutting
EU0020		Paint Room #1- Primer Booth
EU0030		Paint Room #1- Top Coat Booth
EU0040		Paint Room #2- Primer Booth
EU0050		Paint Room #3 Topcoat Booth
EU0060		Paint Room #2 Multi-Purpose Booth
EU0070		Boat Assembly/ Solvent Usage
EU0080		Other Cleaning Solutions
EU0090-110		Carpet Gluing 12, includes three (3) areas of the plant, sometimes referred to as, EU0090, EU0100 & EU0110
EU0120		Non-Carpet/Fabric Adhesive Operations
EU0130-170		Paint Room Drying Ovens (four ovens, EU0130, EU0140, EU0150, EU0160 & EU0170)
EU0180		PAINT ROOM # 2-SPRAY BOOTH POLY
EU0190		PAINT ROOM # 2-SPRAY BOOTH TOPCOAT
EU0200		PAINT ROOM # 3-SPRAY BOOTH PRIMER
EU0210		PAINT ROOM # 3-MULTI-PURPOSE BOOTH

EMISSION UNITS WITHOUT 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	Equipment Number	Emission Point Description
EP-19		Welding (Fugitive)
EP-20		Plasma Cutting
		Three wash booths
		Two spray foam dispensers
		Space heaters (< 10 MMBtu per hour each, LPG fired)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 1097-005, amended April 30, 2001
- 2) Construction Permit 042005-008⁴
- 3) Construction Permit 072010-008A, amended October 6, 2011.

⁴ Construction permits 092002-011 and 022004-002 are not incorporated by reference, since they were completely superseded by 042005-008A.

II. Plant Wide Emission Limitations

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

The following requirements apply to all conditions in addition to any other requirements listed in the specific conditions, unless otherwise noted in the specific conditions.

Monitoring:

The permittee shall calibrate, maintain and operate all instruments and control equipment according to the manufacturer's recommendations or according to good engineering practices.

Recordkeeping:

The permittee shall record all required recordkeeping (i.e. inspections and corrective actions) in the appropriate format. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations. Results of any testing conducted on an emission unit. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

Reporting⁵:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition), to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102
- 2) The permittee shall submit an annual certification⁶ 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. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by **April 1st**, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102

⁵ Refer to Section V. General Permit Requirements, 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, page 31, for additional details, including semi-annual reporting of monitoring data.

⁶ Refer to Section V. General Permit Requirements, 10 CSR 10-6.065(6)(C)3 Compliance Requirements, page 33, for more details.

Permit Condition 1

Plant-wide

10 CSR 10-6.060, Construction Permits Required

Construction Permit 072010-008A, originally issued July 22, 2010, amended October 6,2011

Emission Limitation:

The permittee shall emit less than 249.0 tons of VOCs in any consecutive 12-month period from the entire installation. [[Construction Permit 072010-008A, Special Condition 2.A.](#)]

Monitoring/Recordkeeping:

Attachment E (Monthly VOC Emissions Tracking Record, page 43) or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with emission limitation. [[Construction Permit 072010-008A, Special Condition 2.B.](#)]

Permit Condition 2

Plant-wide

10 CSR 10-6.060, Construction Permits Required

Construction Permit 072010-008A, originally issued July 22, 2010, amended October 6,2011

Emission Limitation:

The permittee shall keep all VOC and HAP emitting solvents, paints, and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all VOC and HAP emitting solvent, paints and cleaning solution containers used with this equipment. [[Construction Permit 072010-008A, Special Condition 5.](#)]

Permit Condition 3

Plant-wide

10 CSR 10-6.060, Construction Permits Required

Construction Permit 1097-005, issued October 6, 1997

Emission Limitation:

If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, *Restriction of Emission of Odors*, the Director may require the source to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. The source shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit. [[Construction Permit 1097-005, Special Condition 1](#)]

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.

Visible Emission Sources	
Stack ID	Description
50	Paint Room #1- Primer Booth
52	Paint Room #1- Top Coat Booth
55	Carpet Gluing
70	Paint Room #2- Spray Booth
EP-20	Plasma Cutter
EU0050	Paint Room #3
EU0180	SPRAY BOOTH POLY
EU0190	SPRAY BOOTH TOPCOAT
EU0200	SPRAY BOOTH PRIMER
EU0210	MULTI-PURPOSE BOOTH

Permit Condition 1
 Visible Emission Sources
 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitations:

The permittee shall not discharge into the ambient air from any source, not exempted under 10 CSR 10-6.220, any air contaminant of opacity greater than twenty (20%) percent. A source with a 20 percent opacity limit may emit air contaminants with opacity over 20 percent, but not greater than 40 percent for an aggregate length of time not to exceed six (6) minutes in any 60 minutes. Where the presence of uncombined water is the only reason for failure of an emission to meet the opacity requirements, the opacity requirements shall not apply.

Monitoring / Recordkeeping:

The permittee will follow the monitoring and recordkeeping requirements listed in Section IV. Core Permit Requirements for 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, starting on page 29.

VVVV Sources			
Emission Unit	Equipment Number	Description	Control Devices
EU0020		Paint Room #1- Primer Booth	
EU0030		Paint Room #1- Top Coat Booth	
EU0030		Paint Room #1- Top Coat Booth	
EU0040		Paint Room #2- Primer Booth	
EU0050		Paint Room #3 Topcoat Booth	
EU0060		Paint Room #2 Multi-Purpose Booth	

VVVV Sources			
Emission Unit	Equipment Number	Description	Control Devices
EU0070		Boat Assembly/ Solvent Usage	
EU0080		Other Cleaning Solutions	
EU0090 -110		Carpet Gluing 12, includes three (3) areas of the plant, sometimes referred to as, EU0090, EU0100 & EU0110	
EU0180		PAINT ROOM # 2-SPRAY BOOTH POLY	
EU0190		PAINT ROOM # 2-SPRAY BOOTH TOPCOAT	
EU0200		PAINT ROOM # 3-SPRAY BOOTH PRIMER	
EU0210		PAINT ROOM # 3-MULTI-PURPOSE BOOTH	

Permit Condition 1
 VVVV Sources
 10 CSR 10-6.075, Maximum Achievable Control Technology
 40 CFR Part 63, Subpart A General Provisions and Subpart VVVV National Emission Standards for
 Hazardous Air Pollutants for Boat Manufacturing

Emission Limitation:

- 1) *Carpet and Fabric Adhesives:* The permittee must use carpet and fabric adhesives that contain no more than five (5) percent organic HAP by weight. [\[§63.5740\(a\)\]](#)
- 2) *Aluminum Wipedown Solvent Operations and Aluminum Surface Coating Operations:* For aluminum wipedown solvent operations and aluminum surface coating operations, you must comply with either the separate emission limits in §63.5743(a)(1) and (2), or the combined emission limit in §63.5743(a)(3). Compliance with these limitations is based on a 12-month rolling average that is calculated at the end of every month. [\[§63.5743\(a\)\]](#)
 - a) You must limit emissions from aluminum wipedown solvents to no more than 0.33 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. No limit applies when cleaning surfaces are receiving decals or adhesive graphics. [\[§63.5743\(a\)\(1\)\]](#)
 - b) You must limit emissions from aluminum recreational boat surface coatings (including thinners, activators, primers, topcoats, and clear coats) to no more than 1.22 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. [\[§63.5743\(a\)\(2\)\]](#)
 - c) You must limit emissions from the combined aluminum surface coatings and aluminum wipedown solvents to no more than 1.55 kilograms of organic HAP per liter of total coating solids applied from aluminum primers, clear coats, and top coats combined. [\[§63.5743\(a\)\(3\)\]](#)
- 3) You must comply with the work practice standard in §63.5743(b)(1), (2), (3), or (4) when cleaning aluminum coating spray guns with solvents containing more than five percent organic HAP by weight. [\[§63.5743\(b\)\]](#)
 - a) Clean spray guns in an enclosed device. Keep the device closed except when you place the spray guns in or remove them from the device. [\[§63.5743\(b\)\(1\)\]](#)
 - b) Disassemble the spray gun and manually clean the components in a vat. Keep the vat closed when it is not in use. [\[§63.5743\(b\)\(2\)\]](#)
 - c) Clean spray guns by placing solvent in the pressure pot and forcing the solvent through the gun. Do not use atomizing air during this procedure. Direct the used cleaning solvent from the spray gun into a container that is kept closed when not in use. [\[§63.5743\(b\)\(3\)\]](#)

- d) An alternative gun cleaning process or technology approved by the Administrator according to the procedures in §63.6(g). [§63.5743(b)(4)]

Monitoring:

- 1) *Carpet and Fabric Adhesives:* To demonstrate compliance with the carpet and adhesive emission limitation in §63.5740(a), you must determine the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758. [§63.5740(b)]
- 2) *Aluminum Wipedown Solvent Operations and Aluminum Surface Coating Operations:* To demonstrate compliance with the emission limits for aluminum wipedown solvents and aluminum coatings specified in §63.5743(a), you must meet the requirements of §63.5746(a) through (f) listed below. [§63.5746]
 - a) Determine and record the organic HAP content (kilograms of organic HAP per kilogram of material, or weight fraction) of each aluminum wipedown solvent and aluminum coating (including primers, topcoats, clear coats, thinners, and activators). Use the methods in §63.5758 to determine organic HAP content. [§63.5746(a)]
 - b) Use the methods in §63.5758(b) to determine the solids content (liters of solids per liter of coating, or volume fraction) of each aluminum surface coating, including primers, topcoats, and clear coats. Keep records of the solids content. [§63.5746(b)]
 - c) Use the methods in §63.5758(c) to determine the density of each aluminum surface coating and wipedown solvent. [§63.5746(c)]
 - d) Compliance is based on a 12-month rolling average calculated at the end of every month. The first 12-month rolling-average period begins on the compliance date specified in §63.5695. [§63.5746(d)]
 - e) At the end of the twelfth month after the compliance date and at the end of every subsequent month, use the procedures in §63.5749 to calculate the organic HAP from aluminum wipedown solvents per liter of coating solids, and use the procedures in §63.5752 to calculate the kilograms of organic HAP from aluminum coatings per liter of coating solids. [§63.5746(e)]
 - f) Keep records of the calculations used to determine compliance. [§63.5746(f)]
- 2) *Approval of alternative means of demonstrating compliance.* You may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from aluminum wipedown solvent and coating operations and demonstrating compliance with the emission limits in §63.5743(a). [§63.5746(g)]
 - a) The application must include the information listed in §63.5746(g)(1)(i) through (iii). [§63.5746(g)(1)]
 - i) An engineering evaluation that compares the emissions using the alternative means to the emissions that would result from using the strategy specified in §63.5746(a) through (e). The engineering evaluation may include the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made. [§63.5746(g)(1)(i)]
 - ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test. [§63.5746(g)(1)(ii)]
 - iii) Details of appropriate recordkeeping and reporting procedures. [§63.5746(g)(1)(iii)]
 - b) The Administrator will approve the alternative means of limiting emissions if the Administrator determines that HAP emissions will be no greater than if the source uses the procedures described in §63.5746(a) through (e) to demonstrate compliance. [§63.5746(g)(2)]

- c) The Administrator’s approval may specify operation, maintenance, and monitoring requirements to ensure that emissions from the regulated operations are no greater than those that would otherwise result from regulated operations in compliance with Subpart VVVV. [§63.5746(g)(3)]

Compliance Demonstration/Calculations:

- 1) *Calculating Organic HAP Content of Aluminum Wipedown Solvents:* Use equation 1 to calculate the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months. [§63.5749(a)]

$$HAP_{WD} = \frac{\sum_{j=1}^n (Vol_j)(D_j)(W_j)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad \text{(Equation 1)}$$

Where:

HAP_{WD} = weighted-average organic HAP content of aluminum wipedown solvents, kilograms of HAP per liter of total coating solids from aluminum primers, top coats, and clear coats.

n = number of different wipedown solvents used in the past 12 months.

Vol_j = volume of aluminum wipedown solvent j used in the past 12 months, liters.

D_j = density of aluminum wipedown solvent j, kilograms per liter.

W_j = mass fraction of organic HAP in aluminum wipedown solvent j.

m = number of different aluminum surface coatings (primers, top coats, and clear coats) used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

Solids_i = solids content aluminum primer, top coat, or clear coat i, liter solids per liter of coating.

- 2) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 0.33 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(1). [§63.5749(b)]
- 3) *Calculating Organic HAP Content for All Aluminum Surface Coatings:* Use equation 2 to calculate the weighted-average HAP content for all aluminum surface coatings used in the past 12 months. [§63.5752(a)]

$$HAP_{SC} = \frac{\sum_{i=1}^m (Vol_i)(D_i)(W_i) + \sum_{k=1}^D (Vol_k)(D_k)(W_k)}{\sum_{i=1}^m (Vol_i)(Solids_i)} \quad \text{(Equation 2)}$$

Where:

HAP_{SC} = weighted-average organic HAP content for all aluminum coating materials, kilograms of organic HAP per liter of coating solids.

m = number of different aluminum primers, top coats, and clear coats used in the past 12 months.

Vol_i = volume of aluminum primer, top coat, or clear coat i used in the past 12 months, liters.

D_i = density of coating i, kilograms per liter.

W_i = mass fraction of organic HAP in coating i , kilograms of organic HAP per kilogram of coating.

p = number of different thinners, activators, and other coating additives used in the past 12 months.

Vol_k = total volume of thinner, activator, or additive k used in the past 12 months, liters.

D_k = density of thinner, activator, or additive k , kilograms per liter.

W_k = mass fraction of organic HAP in thinner, activator, or additive k , kilograms of organic HAP per kilogram of thinner or activator.

$Solids_i$ = solids content of aluminum primer, top coat, or clear coat i , liter solids per liter of coating.

- 4) Compliance is based on a 12-month rolling average. If the weighted-average organic HAP content does not exceed 1.22 kilograms of organic HAP per liter of coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(2). [§63.5752(b)]
- 5) *Calculating Combined Organic HAP Content of Aluminum Wipedown Solvents and Aluminum Recreational Boat Surface Coatings:* Use equation 3 to calculate the combined weighted-average organic HAP content of aluminum wipedown solvents and aluminum recreational boat surface coatings. [§63.5753(a)]

$$HAP_{Combined} = HAP_{WD} + HAP_{SC} \quad (\text{Equation 3})$$

Where:

HAP_{WD} = the weighted-average organic HAP content of aluminum wipedown solvents used in the past 12 months, calculated using equation 1 of §63.5749.

HAP_{SC} = the weighted average organic HAP content of aluminum recreational boat surface coatings used in the past 12 months, calculated using equation 1 of §63.5752.

- 6) Compliance is based on a 12-month rolling average. If the combined organic HAP content does not exceed 1.55 kilograms of organic HAP per liter of total coating solids, then you are in compliance with the emission limit specified in §63.5743(a)(3). [§63.5753(b)]
- 7) *Aluminum Coating Spray Gun Cleaning Work Practice Standards:* You must demonstrate compliance with the aluminum coating spray gun cleaning work practice standards by meeting the requirements of §63.5755(a) or (b). [§63.5755]
 - a) Demonstrate that solvents used to clean the aluminum coating spray guns contain no more than five percent organic HAP by weight by determining organic HAP content with the methods in §63.5758. Keep records of the organic HAP content determination. [§63.5755(a)]
 - b) For solvents containing more than five percent organic HAP by weight, comply with the requirements in §63.5755(b)(1) or (b)(2), and §63.5755(b)(3). [§63.5755(b)]
 - i) If you are using an enclosed spray gun cleaner, visually inspect it at least once per month to ensure that covers are in place and the covers have no visible gaps when the cleaner is not in use, and that there are no leaks from hoses or fittings. [§63.5755(b)(1)]
 - ii) If you are manually cleaning the gun or spraying solvent into a container that can be closed, visually inspect all solvent containers at least once per month to ensure that the containers have covers and the covers fit with no visible gaps. [§63.5755(b)(2)]
 - iii) Keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers. [§63.5755(b)(3)]
- 8) *Determining Organic HAP Content:* To determine the organic HAP content for each material used, one of the options in §63.5758(a)(1) through (6) can be used. [§63.5758(a)]

- a) *Method 311 (appendix A to 40 CFR Part 63)*. You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in 63.5758(a)(1)(i) and (ii), listed below, when determining organic HAP content by Method 311. [\[§63.5758\(a\)\(1\)\]](#)
- i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at one percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the facility does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP measured, as a value truncated to four places after the decimal point (for example, 0.1234). [\[§63.5758\(a\)\(1\)\(i\)\]](#)
 - ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123). [\[§63.5758\(a\)\(1\)\(ii\)\]](#)
- b) *Method 24 (appendix A to 40 CFR Part 60)*. You may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP. [\[§63.5758\(a\)\(2\)\]](#)
- c) *ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins)*. You may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP. [\[§63.5758\(a\)\(3\)\]](#)
- d) *Alternative method*. You may use an alternative test method for determining mass fraction of organic HAP if the facility obtains prior approval by the Administrator. You must follow the procedure in §63.7(f) to submit an alternative test method for approval. [\[§63.5758\(a\)\(4\)\]](#)
- e) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in §63.5758(a)(1) through (4), such as manufacturer's formulation data, according to §63.5758(a)(5)(i) through (iii) listed below. [\[§63.5758\(a\)\(5\)\]](#)
- i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at one percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the facility does not have to include it in the organic HAP total. [\[§63.5758\(a\)\(5\)\(i\)\]](#)
 - ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in §63.5758(a)(1) through (4) exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance. [\[§63.5758\(a\)\(5\)\(ii\)\]](#)
 - iii) If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in §63.5758(a)(1) through (4) is less than two percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by two percentage points or more, then you must use the measured organic HAP content to determine compliance. [\[§63.5758\(a\)\(5\)\(iii\)\]](#)

f) *Solvent blends.* Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, you may use the values for organic HAP content that are listed in Table 5 or 6 to Subpart VVVV. You may use Table 6 to Subpart VVVV only if the solvent blends in the materials used, do not match any of the solvent blends in Table 5 to Subpart VVVV and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to Subpart VVVV, then the test results must be used for determining compliance.

[§63.5758(a)(6)]

9) *Determining Volume Fraction of Coating Solids in Aluminum Recreational Boat Surface Coatings:* To determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each aluminum recreational boat surface coating, you must use one of the methods specified in §63.5758(b)(1) through (3). If the results obtained with §63.5758(b)(2) or (3) do not agree with those obtained according to §63.5758(b)(1), you must use the results obtained with §63.5758(b)(1) to determine compliance. [§63.5758(b)]

a) *ASTM Method D2697–86(1998) or D6093–97.* You may use ASTM Method D2697–86(1998) or D6093–97 (available for purchase from ASTM) to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.5758(b)(1)]

b) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.5758(b)(2)]

c) *Calculation of volume fraction of coating solids.* You may determine it using equation 4: [§63.5758(b)(3)]

$$\text{Solids} = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Equation 4})$$

Where:

Solids = volume fraction of coating solids, liters coating solids per liter coating.

$m_{\text{volatiles}}$ = Total volatile matter content of the coating, including organic HAP, volatile organic compounds, water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR Part 60, grams volatile matter per liter coating.

D_{avg} = average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–90 (available for purchase from ASTM), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, the test results will take precedence.

10) *Determining Density of Aluminum Recreational Boat Wipedown Solvents:* Determine the density of all aluminum recreational boat wipedown solvents, surface coatings, thinners, and other additives from test results using ASTM Method D1475–90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, you must use the test results to demonstrate compliance. [§63.5758(c)]

Recordkeeping:

- 1) You must record the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758. [§63.5740(b)]
- 2) You must keep records of the solids contents (liters of solid per liter of coating, or volume fraction) of each aluminum surface coating, including primers, top coats, and clear coats. [§63.5746(b)]
- 3) You must keep records of the calculations used to determine compliance. [§63.5746(f)]
- 4) You must keep records of the monthly inspections and any repairs that are made to the enclosed gun cleaners or the covers. [§63.5755(b)(3)]
- 5) You must keep a copy of each notification and report that you submitted to comply with Subpart VVVV. [§63.5767(a)]
- 6) You must keep all documentation supporting any notification or report that you submitted. [§63.5767(b)]
- 7) You must keep records of the total amount of each aluminum coating used per month (including primers, top coats, clear coats, thinners, and activators) and the weighted-average organic HAP content as determined in §63.5752. [§63.5767(c)(2) and §63.5746(a)]
- 8) You must keep records of the total amount of each aluminum wipedown solvent used per month and the weighted-average organic HAP content as determined in §63.5749. [§63.5767(c)(3)]
- 9) Your records must be readily available and in a form so they can be easily inspected and reviewed. [§63.5770(a)]
- 10) You must keep each record for five years following the date that each record is generated. [§63.5770(b)]
- 11) You must keep each record on site for at least two years after the date that each record is generated. The records can be kept offsite for the remaining three years. [§63.5770(c)]
- 12) You can keep the records on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche. [§63.5770(d)]

Reporting:

- 1) You must submit all of the notifications that apply to you in Table 7 of Subpart VVVV. The notifications are described more fully in 40 CFR Part 63, Subpart A, General Provisions, referenced in Table 8 to Subpart VVVV. [§63.5761(a)]
- 2) You must submit an initial notification containing the information specified in §63.9(b)(2). [Table 7 to Subpart VVVV]
- 3) If you qualify for a compliance extension as specified in §63.9(c), then you must submit a request for a compliance extension as specified in §63.9(c). [Table 7 to Subpart VVVV]
- 4) You must submit a notification of compliance status as specified in §63.9(h). [Table 7 to Subpart VVVV]
- 5) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change. [§63.5761(b)]
- 6) You must submit the applicable reports specified in §63.5764(b) through (e). To the extent possible, you must organize each report according to the operations covered by Subpart VVVV and the compliance procedure followed for that operation. [§63.5764(a)]
- 7) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the dates in §63.5764(b)(1) through (5). [§63.5764(b)]
 - a) The first compliance report must cover the period beginning 12 months after August 23, 2004 and ending on December 31. [§63.5764(b)(1)]
 - b) The first compliance report must be postmarked or delivered no later than 60 calendar days after the end of the compliance reporting period specified in §63.5764(b)(1). [§63.5764(b)(2)]

- c) Each subsequent compliance report must cover the applicable semi-annual reporting period from January 1 through June 30 or from July 1 through December 31. [[§63.5764\(b\)\(3\)](#)]
 - d) Each subsequent compliance report must be postmarked or delivered no later than 60 calendar days after the end of the semi-annual reporting period. [[§63.5764\(b\)\(4\)](#)]
 - e) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in §63.5764(b)(1) through (4). [[§63.5764\(b\)\(5\)](#)]
- 8) The compliance report must include the information specified in §63.5764(c)(1) through (7). [[§63.5764\(c\)](#)]
- a) Company name and address. [[§63.5764\(c\)\(1\)](#)]
 - b) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report. [[§63.5764\(c\)\(2\)](#)]
 - c) The date of the report and the beginning and ending dates of the reporting period. [[§63.5764\(c\)\(3\)](#)]
 - d) A description of any changes in the manufacturing process since the last compliance report. [[§63.5764\(c\)\(4\)](#)]
 - e) A statement or table showing, for each regulated operation, the applicable organic HAP content limit or the application equipment requirement with which you are complying. The statement or table must also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period. [[§63.5764\(c\)\(5\)](#)]
 - f) If you were in compliance with the emission limits and work practice standards during the reporting period, the permittee must include a statement to that effect. [[§63.5764\(c\)\(6\)](#)]
 - g) If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed in §63.5764(c)(7)(i) through (iv) in the semi-annual compliance report. [[§63.5764\(c\)\(7\)](#)]
 - i) A description of the operation involved in the deviation. [[§63.5764\(c\)\(7\)\(i\)](#)]
 - ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation. [[§63.5764\(c\)\(7\)\(ii\)](#)]
 - iii) A description of any corrective action you took to minimize the deviation and actions that have been taken to prevent it from happening again. [[§63.5764\(c\)\(7\)\(iii\)](#)]
 - iv) A statement of whether or not you were in compliance for the 12-month averaging period that ended at the end of the reporting period. [[§63.5764\(c\)\(7\)\(iv\)](#)]

EU0010			
Emission Unit	Equipment Number	Description	Control Devices
EU0010		Plywood Cutting: wood cutting, grinding, and drilling using various hand-held and stationary machinery; maximum hourly design rate 0.55 tons per hour; Powermatic, Dewalt, Black & Decker; equipped with dust collection and capture baghouse system; installed 1986	CD01, CD04, CD05

Permit Condition 1
 EU0010
 10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

- 1) The fabric filter (CD01) on the plywood cutting process (EU0010) and paint and glue overspray collection systems (CD04 & CD05) shall be in use at all times when the associated processes are in operation. [\[Construction Permit 1097-005, Special Condition 3\]](#)
- 2) The fabric filter shall be equipped with a gauge or meter which indicates the pressure drop across it. This gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. [\[Construction Permit 1097-005, Special Condition 3\]](#)
- 3) The paint and glue particulate mat or panel filters shall be replaced as deemed necessary by visual inspection. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [\[Construction Permit 1097-005, Special Condition 3\]](#)

Monitoring:

- 1) The permittee shall check and document the baghouse pressure drops daily, whenever the emission unit is in operation. If either pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal.
- 2) Baghouse maintenance monitoring:
 - a) Check and document the cleaning sequence of the dust collector every six months.
 - b) Inspect bags for leaks and wear every six months.
 - c) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months.
- 3) Maintain a written record of all observations, deficiencies and any action resulting from inspections.

Recordkeeping:

- 1) The permittee shall document all pressure drop readings using Attachment F (Pressure Drop Records, page 44), or an equivalent approved form.
- 2) All inspections, corrective actions, and instrument calibration shall be recorded using Attachment D (Inspection/Maintenance/Repair/Malfunction Log, page 42), or an equivalent approved form.

Surface Coating Operations			
Emission Unit	Equipment Number	Description	Control Devices
EU0020		Old Paint Shop - Primer Booth: various primers, paints and solvents are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in semi-enclosed and ventilated booth; maximum hourly design rate 18.0 gallons per hour; installed 1972	Mat Filter
EU0030		Old Paint Shop - Top Coat Booth: various primers, paints and solvents are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in semi-enclosed and ventilated booth; maximum hourly design rate 18.0 gallons per hour; installed 1972	Mat Filter
EU0040		New Paint Shop Spray Booth: various primers, paints and solvents are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in enclosed and ventilated booth; maximum hourly design rate 18.0 gallons per hour; installed 1989	CD04, Mat Filter
EU0050		Paint Booth #4: various paints and coating are applied using pneumatic hand held conventional and HVLP, airless, and air-assist spray equipment in enclosed and ventilated booth; maximum hourly design rate 18.8 gallons per hour; installed 2003	Mat Filter
EU0060		Multi-Purpose Booth: both paints and adhesives are applied; maximum hourly design rate for paints 18.8 gallons per hour; maximum hourly design rate for adhesives 28.2 gallons per hour; installed 2005	Mat Filter

Permit Condition 1
 Surface Coating Operations
 10 CSR 10-6.060, Construction Permits Required
 Construction Permit 1097-005, Issued September 22, 1997⁷
 Construction Permit 042005-008, Issued March 24, 2005⁸
 10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter

Emission Limitation:

- 1) The paint overspray collection system (CD04) shall be in use at all times when the associated process (EU0040) is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. The paint particulate mat or filter shall be replaced as deemed necessary by visual inspection. Replacement filters shall be kept on hand at all times. The filters

⁷ Construction Permit 1097-005 applies to New Paint Shop Spray Booth (EU0040)

⁸ Construction Permit 042005-005 applies to the Multi-Purpose Booth (EU0060)

shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance.) [Construction Permit 1097-005, Special Condition 3]

- 2) Booths shall not be operated without a mat/panel filter in place.
- 3) A panel filter must be in use at all times when the Multi-Purpose Booth (EU0060) is in operation and shall be operated and maintained in accordance with the manufacturer’s specifications. [Construction Permit 042005-005, Special Condition 4]

Monitoring:

- 1) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 2) The filters shall be inspected each shift before spraying begins and after installation of a new filter.

Recordkeeping:

All inspections, corrective actions, and instrument calibration shall be recorded using Attachment D (Inspection/Maintenance/Repair/Malfunction Log, page 42), or an equivalent approved form.

Carpet Gluing			
Emission Unit	Equipment Number	Description	Control Devices
EU0090-110		Carpet Gluing 12, 12A, 12B [includes three (3) areas of the plant, sometimes referred to as, EU0090, EU0100 & EU0110]: various glues and adhesives applied using pneumatic hand-held spray equipment in semi-enclosed and ventilated booth; maximum hourly design rate 28.2 gallons per hour; Custom build booth with DeVilbis, Graco, or equivalent spray equipment	Mat filter

Permit Condition 1
 Carpet Gluing
 10 CSR 10-6.060, Construction Permits Required
 Construction Permit # 1097-005, Issued September 22, 1997
 10 CSR 10-6.400, Restriction of Particulate Matter From Particulate Matter

Emission Limitation:

The glue overspray collection systems shall be in use at all times when the associated processes are in operation, and shall be operated and maintained in accordance with the manufacturer’s specifications. The particulate mats or filters shall be replaced as deemed necessary by visual inspection. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance.) [Construction Permit 1097-005, Special Condition 3]

Monitoring:

- 1) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 2) The filters shall be inspected each shift before spraying begins and after installation of a new filter.

- 3) The manufacturer’s recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

All inspections, corrective actions, and instrument calibration shall be recorded using Attachment D (Inspection/Maintenance/Repair/Malfunction Log, page 42), or an equivalent approved form.

Drying Ovens			
Emission Unit	Equipment Number	Description	Control Devices
EU0130-170	Paint #1, #2 (two), #3 (two) drying ovens	Paint Room Drying Ovens (five ovens, EU0130, EU0140, EU0150, EU0160 & EU0170), NG-fired combustion unit; maximum hourly design rates (respectively) 5.0, 5.0, 1.6, 0.6 & 1.6 MMBtu per hour	

Permit Condition 1
 Drying Ovens
 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitation:

The *Drying Ovens* shall be limited to burning pipeline grade natural gas or liquefied petroleum gas or any combination of these fuels.

Monitoring/Recordkeeping:

This state rule provides an exemption at (1)(A)2.:

Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2. or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels.

The permittee shall maintain documentation supporting that the fuels used in these emission units are pipeline grade natural gas or liquefied petroleum gas or a combination of these fuels.

Painting Sources			
Emission Unit	Equipment Number	Description	Control Devices
EU0180	Paint Room #2	Spray Booth Poly	CD8
EU0190	Paint Room #2	Spray Booth Topcoat	CD9
EU0200	Paint Room #3	Spray Booth Primer	CD10
EU0210	Paint Room #3	Multi-Purpose Booth	CD11

Permit Condition 1
 Painting Sources
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit No. 072010-008A

Emission Limitations:

- 1) Use of Alternative Coatings in *Painting Sources* (EU0180, EU0190, EU0200, and EU0210):
 - a) When considering using an alternative material in the new paint booth that is different than a material listed in the Application for Authority to Construct, Lowe Boats, Inc.⁹ shall calculate the potential emissions of volatile organic compounds (VOCs) and each individual HAP in the alternative material for the project. [Construction Permit 072010-008A, Special Condition 3.A.]
 - b) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases:
 - i) If the project’s potential VOC emissions with the use of an alternative material is equal to or greater than 100.9 tons per year (tpy). [Construction Permit 072010-008A, Special Condition 3.B.1)]
 - ii) If the potential individual HAP emissions for the alternative material is equal to or greater than the Screening Model Action Levels (SMAL) for any compound listed in *Air Pollution Control Program, Table of Hazardous Air Pollutants, Screening Model Action Levels, and Risk Assessment Levels*, published on the department of Natural Resources’ Air Pollution Control Program’s Permit Guidance webpages at <http://dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>. [Construction Permit 072010-008A, Special Condition 3.B.2)]
- 2) Control Device Requirements
 - a) The permittee shall control emissions from each spray gun using a paint booth equipped with high efficiency filters. The paint booths (EU0180, EU0190, EU0200, and EU0210) and high efficiency filters (CD8, CD9, CD10, and CD11) shall be maintained in accordance with the manufacturer’s specifications. Replacement filters shall be kept on hand at all times. [Construction Permit 072010-008A, Special Condition 4.A.]
 - b) Only one spray gun may be operated in each paint booth at a time. [Construction Permit 072010-008A, Special Condition 4.B.]
 - c) The permittee shall not replace the spray guns or modify the spray guns such that the current application rates as given in the application are exceeded. [Construction Permit 072010-008A, Special Condition 4.C.]

⁹ Lowe Boats, Inc. is now known as Brunswick Freshwater Group – Lebanon Missouri.

Monitoring/Recordkeeping:

The permittee shall use the pre-approved electronic spreadsheet. A sample is shown in Appendix G (Sample of Pre-Approved Workbook, page 45) or an equivalent approved recordkeeping page to show compliance. [[Construction Permit 072010-008A, Special Condition 3.C.](#)]

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 is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the

City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Brunswick Freshwater Group - Lebanon Missouri may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Brunswick Freshwater Group - Lebanon Missouri fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;

- f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

- 1) The permittee shall submit 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) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

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

Monitoring:

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

The permittee shall maintain the following monitoring schedule¹⁰:

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

Recordkeeping:

The permittee shall document all readings on Attachment A (Fugitive Emission Observations, page 39), 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.

¹⁰ The reissuance of this operating permit will not affect the frequency of monitoring. The permittee may continue their current monitoring schedule-for all affected emission units.

- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

Emission Limitation:

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

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using procedures similar to U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule¹¹:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.

¹¹ The reissuance of this operating permit will not affect the frequency of monitoring. The permittee may continue their current monitoring schedule-for all affected emission units.

- ii) If a violation is noted, monitoring reverts to weekly.
- iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment B (Opacity Emission Observations, page 40) and C (Method 9 Opacity Emissions Observations, page 41), or their equivalent, noting:

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone
--

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.

- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065(6)(C)1.B Permit Duration

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

10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) 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.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.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 semi-annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

10 CSR 10-6.065(6)(C)1.F Severability Clause

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.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably

may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

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.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64

exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:

- a) The identification of each term or condition of the permit that is the basis of the certification;
- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 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.

10 CSR 10-6.065(6)(C)7 Emergency Provisions
--

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 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 application, 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII,

11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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.

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

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

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) 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) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 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) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

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

VI. Attachments

Attachments follow.

Attachment C

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

Attachment G

Sample of Pre-Approved Workbook

(taken from workbook labeled: 2010-05-004 Lowe PTE using DNR spreadsheet submittal.xls)

Product	Lowe Part #	Chemical Constituent	CAS #	Percent of Chemical	VOC	VOC Content Lb/Gal	HAP	Weight per Gallon	Specific Gravity	Solids %
*PPG Black Delfleet SPU9000 <i>(as blended with DDh525 Urethane Hardner)</i>	190017					3.40		8.32	0.998	60.290
		Methyl (N-AMYL) Ketone	110-43-0	30.00			no			
		Ethyl Acetate	141-78-6	7.00			no			
		N-Butyl Acetate	123-86-4	5.00			no			
		Carbon Black	1333-86-4	5.00			no			
*Silver Birch Metallic Defleet SPU - PPG <i>(HSL922999Q)</i>						3.35		8.72	1.046	61.500
		Methyl (N-Amyl) Ketone	110-43-0	30.00			no			
		aluminium powder (stabilized)	7429-90-5	10.00			no			
		ethyl acetate	141-78-6	5.00			no			
		n-butyl acetate	123-86-4	5.00			no			
		Naphtha	8052-41-3	5.00			no			
		n-heptane	142-82-5	5.00			no			
		Naphtha	64742-88-7	1.50			no			
		Aromatic Naphtha	64742-95-6	1.50			no			
		Titanium Dioxide	13463-67-7	1.50			no			
		Methyl Ethyl Ketone	78-93-3	1.00			no			
*PPG Low Cure Catalyst Solution GXM350						6.18		9.43	1.132	34.490
		Parachlorobenzotrifluoride	98-56-6	70.00			no			
		Alkyl Phenol Polyamine Adduct	Trade Secret	40.00						
		N-butyl alcohol	71-36-3	13.00			no			
		Ethylendiamine	107-15-3	5.00			no			
		Dimethyl Amino Methyl Phenol	25338-55-0	1.50			no			
*PPG-3.5 VOC Epoxy Primer SEP63229R						4.84		10.81	1.297	55.230
		Epoxy Resin	25068-38-6	13.00			no			
		Barium Sulfate	7727-43-7	13.00			no			
		Tert-butyl acetate	540-88-5	13.00			no			
		Calcium Carbonate	1317-65-3	13.00			no			
		Acetone	67-64-1	10.00			no			
		2-butoxy ethanol	111-76-7	10.00			no			
		Titanium Dioxide	13463-67-7	7.00			no			
		Ketones, C-11	71808-49-6	5.00			no			
		Propylene Glycol Monomethyl Ether	107-98-2	5.00			no			
		Talc	14807-96-6	5.00			no			
		Methyl (N-AMYL) Ketone	110-43-0	5.00			no			
		Aromatic Naphtha	64742-95-6	5.00			no			
		Xylenes	1330-20-7	5.00			yes			
		1,2,4-trimethyl benzene	95-63-6	1.50			no			
		Vinyl Resin	25086-48-0	1.50			no			
		Quartz	14808-60-7	1.00			no			
		Ethyl Benzene	100-41-4	1.00			yes			
		(As silica, crystalline and quartz)	14808-60-7	deminimis			no			
		(As glycol ethers)	111-76-2	deminimis			yes			
*PPG-Urethane Hardner (GXH3640)						3.69		8.22	0.986	55.080
		Hexane-1, 6-Di-isocyanate polymer	28182-81-2	40.00			no			
		Methyl (N-AMYL) Ketone	110-43-0	40.00			no			
		Isophorone diisocyanate polymer	53880-05-0	30.00			no			
		Aromatic Naphtha	64742-95-6	7.00			no			
		n-butyl acetate	123-86-4	7.00			no			
		1,2,4-trimethyl benzene	95-63-6	5.00			no			
		Isophorone diisocyanate	4098-71-9	1.00			no			
		(as diisocyanates)	4098-71-9	deminimis			no			
*PPG-Reducer (DT885)						7.04		7.04	0.845	0.000

STATEMENT OF BASIS

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 December 13, 2011;
- 2) 2010 Emissions Inventory Questionnaire; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Permit Project Listing:

Received	Completed	Permit #	Description:	Status:	Permit Type:	Project#:	Expires
5/5/1997	10/6/1997	1097-005	application for non-Grandfathered sources	Permit Issued	Sec 5 & 6: Deminimis and Minor	EX1050006005	None
5/12/1997	12/3/1998	P105-0006-000	Aluminum Boats	Operating Permit Issued	Part 70 Operating Permit	EX1050006020	12/3/2003
3/12/2001	4/30/2001	1097-005A	Move gluing	Amendment Approved	Applicability Determination Request	EX200103047	None
5/17/2001	10/15/2001	OP	Remove rescinded rules	Amendment Approved	Part 70 Operating Permit Admin. Amen	AP200105066	12/3/2003
5/21/2001	6/11/2001	None	Plasma Cutting	No Permit Required	Applicability Determination Request	AP200105072	None
6/27/2002	9/17/2002	092002-011	Add paint booths	Section 5 Permit Issued	Sec 5 & 6: Deminimis and Minor	AP200206133	None
5/9/2003	6/13/2003	None	Add various sources	Permit Required	Applicability Determination Request	AP200305039	None
6/4/2003	7/11/2007	OP2007-032	Boats	Operating Permit Issued	Part 70 Operating Permit Renewal	AP200306023	7/10/2012
9/8/2003	10/15/2003	None	Wash Booths	Permit Required	Applicability Determination Request	AP200309027	None
9/8/2003	10/15/2003	None	Change emission points	No Permit Required	Applicability Determination Request	AP200310001	None
9/29/2003	12/18/2003	P105-0006-001	Plant manager change	Amendment Approved	Part 70 Operating Permit Admin. Amen	AP200309112	12/3/2003

Received	Completed	Permit #	Description:	Status:	Permit Type:	Project#:	Expires
11/21/2003	2/9/2004	022004-002	Wash Booths	Section 5 Permit Issued	Sec 5 & 6: Deminimis and Minor	AP200311054	None
2/20/2004	3/4/2004	None	Move Spray Booth	No Permit Required	Applicability Determination Request	AP200402092	None
9/1/2004	4/9/2008	OP	Paint booth removal	Closed out, per policy	Part 70 Operating Permit Admin. Amen	AP200409038	6/3/2008
9/1/2004	9/27/2004	None	Glue Station	No Permit Required	Applicability Determination Request	AP200409003	None
10/19/2004	12/6/2004	None	Non-Skid Coating	No Permit Required	Applicability Determination Request	AP200410037	None
12/27/2004	4/8/2005	042005-008	Paint/Glue Spray	Section 5 Permit Issued	Sec 5 & 6: Deminimis and Minor	AP200412102	None
7/3/2006	8/9/2006	OP	Relocate cutters	Request Approved	Part 70 Operating Permit Off-Permit Change	AP200607030	None
5/3/2010	7/22/2010	072010-008	Add spray booths	Section 5 Permit Issued	Sec 5 & 6: Deminimis and Minor	AP201005004	None
6/8/2010	7/15/2010	OP2007-032A	Drying oven fuel	Amendment Approved	Part 70 Operating Permit Minor Modification	AP201006041	7/10/2012
10/18/2010	5/4/2011	OP2007-032	Responsible Official Change	Amendment Approved	Part 70 Operating Permit Admin. Amendment	AP201010034	7/10/2012
8/3/2011	10/6/2011	072010-008A	Amend HAP Calculation	Amendment Approved	Corrections & Amendments	AP201108013	None

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

This rule provides for various exemptions. Refer to **Enclosure A: Analysis of the 10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes**, found on page SB-7, for a determination table. Rule exemptions for paragraphs (1)(B)12., (1)(B)16. and (1)(B)15. correspond to the 5th, 4th and 3rd columns from the right in the table, respectively. Some of the exemptions depend on control devices or that a certain level of air pollution control efficiency be

achieved and maintained. Permit conditions may exist that insure that continuous control is achieved.

2) 10 CSR 10-6.100, *Alternate Emission Limits*

This rule does not apply to this installation, because it is not in a non-attainment area for ozone.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

1) Construction Permit 1097-005

- a) Special Condition 2 (requiring VOC emitting materials to be kept in sealed containers), Special Condition 4 (establishing an emission limitation of 249 tons of VOC from the entire installation in any consecutive 12-month period), Special Condition 5 (establishing VOC recordkeeping requirements) and Special Condition 6 (requiring reporting of any exceedances of the VOC limit) are also contained in the more recent Construction Permit 072010-008A although the wording is slightly different. It is assumed that the Special Conditions 2, 4, 5, and 6 in Construction Permit 1097-005 are superseded by Construction Permit 042005-008.
- b) This construction permit was amended in 2001 to authorize the division and relocation of the gluing operation (EP-12). The divided and relocated gluing units are identified in this operating permit as Carpet Gluing 12 (EU0090) and Carpet Gluing 12A (EU0100).
- c) This construction permit listed 10 CSR 10-2.060 as an applicable requirement. This rule applied to the Kansas City metropolitan area only and was rescinded and replaced by 10 CSR 10-6.220.
- d) This construction permit listed 10 CSR 10-3.050 as an applicable requirement. This rule was rescinded and replaced by 10 CSR 10-6.400.
- e) This construction permit listed 10 CSR 10-3.080 as an applicable requirement. This rule was rescinded and replaced by 10 CSR 10-6.220.

2) Construction Permit 092002-011

- a) All special conditions found in this construction permit were superseded by Special Condition 1 of Construction Permit 042005-008 which states "The conditions of this permit supersede all special conditions found in the previously issued construction permits (Permit Numbers 092002-011 and 022004-002) from the Air Pollution Control Program."
- b) This construction permit authorized the installation of a new paint booth (EP-21), a new touch-up paint booth (EP-22) and the relocation of the existing carpet gluing operation (EP-12). The touch-up paint booth (EP-22) was removed from the facility and is not included in this operating permit.

3) Construction Permit 022004-002

- a) All special conditions found in this construction permit were superseded by Special Condition 1 of Construction Permit 042005-008 which states "The conditions of this permit supersede all special conditions found in the previously issued construction permits (Permit Numbers 092002-011 and 022004-002) from the Air Pollution Control Program."

4) Construction Permit 042005-008

- a) This permit supersedes all special conditions found in previously issued construction permits (Permit Numbers 092002-011 and 022004-002) from the Air Pollution Control Program.
[\[Construction Permit 042005-008, Special Condition 1\]](#)

5) Construction Permit 072010-008A (amended version of 072010-008)

- a) This permit is assumed to supersede 042005-008, even though it states it supersedes 092002-011. The assumption is made based on the fact that 042005-008 already superseded 092002-011 and that the permit updates the plant-wide emission limit for VOCs.

NSPS Applicability

None of the New Source Performance Standards (NSPS) regulations apply to this installation.

MACT Applicability

- 1) 40 CFR Part 63, Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing*
This rule does apply to this installation. The specific emission units that are subject have been identified and included as a group, **VVVV Sources**, found on page 9 of the permit.
- 2) 40 CFR Part 63, Subpart II, *National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair Operations*
This rule is not applicable to this installation because the installation's operations do not meet the definition of shipbuilding or ship repair operations.
- 3) 40 CFR Part 63, Subpart MMMM *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*
This rule is not applicable to this installation because according to §63.3881(c)(15), this subpart does not apply to the surface coating of boats or metal parts of boats (including, but not limited to, the use of assembly adhesives) where the facility meets the applicability criteria for Subpart VVVV of Part 63.

None of the other Maximum Achievable Control Technology (MACT) regulations apply to this installation.

NESHAP Applicability

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

40 CFR Part 61 Subpart M, *National Standards for Asbestos*

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

Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250

In the permit application and according to Air Pollution Control Program records, there was no indication that any of these regulations apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

None of the other National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation.

CAM Applicability

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

The entire installation has the potential to emit VOC and HAP above major source thresholds; however, no control devices (as defined by 40 CFR §64.1) are used to comply with any applicable VOC or HAP emission standards. Therefore, the installation is not required to submit a CAM plan under Part 64 at the time of Title V permit issuance.

Other Regulatory Determinations

1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule was included for the drying ovens (EU0130 through EU0160) only for the purpose of restricting the emission units to burning either pipeline grade natural gas or liquid petroleum gas.

2) Emission Units Without Limitations

a) Welding (EP-19)

Welding is exempt from 10 CSR 10-6.400 because according to 10 CSR 10-6.400(1)(B)7, fugitive emissions are exempt. In addition, welding does not have any unit specific limitations at the time of permit issuance and therefore is listed as a Emission Unit Without Limitations.

b) Plasma Cutters (EP-20)

The plasma cutters are exempt from 10 CSR 10-6.400 because according to 10 CSR 10-6.400(1)(B)11, emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The calculations below verify that this emission unit has a potential to emit less than 0.5 pounds per hour of particulate matter. In addition, the plasma cutters do not have any unit specific limitations at the time of permit issuance and therefore are listed as Emission Units Without Limitations.

maximum hourly design rate = 1 ton/hr (Source: 2004 EIQ)

PM₁₀ Emission Factor = 0.142 lb/ton (Source: 2004 EIQ)

Assume PM Emission Factor = 2 x PM₁₀ Emission Factor = 0.284 lb/ton

PTE = 1 ton/hr x 0.284 lb/ton = 0.284 pounds per hour

c) Three Wash Booths

The wash booth operations consist of the application of a metal preparation solution. According to the Part 70 renewal permit application, the solution does not contain VOC. Therefore, the wash booths are not subject to the VOC emission limitation in Permit Condition PW001. In addition, the wash booths do not have any unit specific limitations at the time of permit issuance and therefore are listed as Emission Units Without Limitations.

d) Two Spray Foam Dispensers

The spray foam dispensers use a two part foam dispenser that when combined form a porous material used to fill, insulate, and provide buoyancy to the inner hulls of the boats. According to the Part 70 renewal permit application, the spray foam operations do not emit VOC. Therefore, the spray foam dispensers are not subject to the VOC emission limitation in Permit Condition PW001. In addition, the spray foam dispensers do not have any unit specific limitations at the time of permit issuance and therefore are listed as Emission Units Without Limitations.

Greenhouse Gas Emissions

This installation is not a major source for greenhouse gases.

Updated Potential to Emit for the Installation⁰

Pollutant	Potential to Emit (tons per year)¹²
CO	105.7
CO ₂ e	6,523.2
HAP	132.5 ¹³
NO _x	541.0
PM ₁₀	31.2
PM _{2.5}	1.2
SO _x	0.1
VOC	249.0 ¹⁴

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

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

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

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

Prepared by:

Randy E. Raymond
Environmental Engineer

¹² Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

¹³ Most of these may be reported as VOCs or PMs.

¹⁴ There is a plant-wide emission limitations on VOC.

Enclosure A: Analysis of the 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

Process Description	Process Weight Rate (ton/hr)	Emission Factor (lb/ton)	Capture Device Efficiency (%)	Control Device Efficiency (%)	Uncontrolled Emission Rate (lb/hr)	Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)	PTE is less than 0.5 lbs per hour? (yes/no)	Is unit in compliance without controls? (yes/no)	Is the Control Efficiency Greater Than 90%?	Is unit in compliance with controls? (yes/no)	PTE as percentage of Allowable
Plasma Cutting	1.000	0.10	100	-	0.10	0.10	4.10	YES	YES	NO	YES	2%
Plywood Cutting	0.291	19.30	100	99.00	5.62	0.06	1.79	YES	NO	YES	YES	3%
Paint Room Drying Ovens	5.671	0.91	100	-	5.16	5.16	13.11	NO	YES	NO	YES	39%
PAINT ROOM # 2-SPRAY BOOTH POLY	2.000	- ¹⁵	100	95.00	0.00	0.00	6.52	YES	YES	YES	YES	0%
PAINT ROOM # 2-SPRAY BOOTH TOPCOAT	2.800	-	100	95.00	0.00	0.00	8.17	YES	YES	YES	YES	0%
PAINT ROOM # 3-SPRAY BOOTH PRIMER	0.600	-	100	95.00	0.00	0.00	2.91	YES	YES	YES	YES	0%
PAINT ROOM # 3-MULTI-PURPOSE BOOTH	1.000	-	100	95.00	0.00	0.00	4.10	YES	YES	YES	YES	0%

¹⁵ There are no EPA emission factors for particulate matter available for these processes. The control equipment prevents any overspray from escaping.

Mr. John Parkhurst
Brunswick Freshwater Group - Lebanon Missouri
2900 Industrial Drive
Lebanon, MO 65536

Re: Brunswick Freshwater Group - Lebanon Missouri, 105-0006
Permit Number: **OP2013-012**

Dear Mr. Parkhurst:

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.

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 do not hesitate to contact Randy Raymond at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:rrk

Enclosures

c: Southwest Regional Office
PAMS File: 2011-12-037



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

MEMORANDUM

DATE: October 24, 2012

TO: 2011-12-037 File, Brunswick Freshwater Group - Lebanon Missouri Facility

FROM: Randy E. Raymond, Environmental Technician

SUBJECT: Response to Public Comments

Ten (10) comments were received. All of the comments were from U.S. EPA Region VII staff. The comments are addressed in the order of which they appear within the letter(s).

Comment 1: The installation description on the cover page of the draft permit and at the top of page 4 does not indicate the pollutant(s) which create the need for a Part 70 /Title V operating permit. The customary practice of the MDNR is to include and specify the regulated air pollutants that make the source major and therefore subject to a Part 70 operating permit in the Installation Description on the permit cover sheet and the Installation Description and Equipment Listing section of the permit. However, the installation descriptions reviewed in the Brunswick Freshwater Group -- Lebanon, Missouri draft permit do not indicate the major regulated air pollutant(s).

Therefore, EPA suggests MDNR consider listing the major air pollutant(s) in the installation description that makes the source subject to Title V.

Response to Comment: The Statement of Basis contains an "*Updated Potential to Emit for the Installation*", which identifies all the regulated pollutants that exceed the "major" source thresholds. Also, Missouri's regulations state that an installation may submit for review and approval a Part 70 application, even though a Part 70 operating permit may not be required (i.e. the installation may not be "major"). However, in those cases, we should nevertheless state why a Part 70 operating permit is proposed to be issued. The comment is correct and the appropriate language has been included.

Comment 2: The listing of emission units with limitations has a duplicate entry for EU0030 and EPA suggests that one of them be removed.

Response to Comment: This correction has been made.

Comment 3: The table of emission units preceding the Permit Condition 1 "Visible Emission Sources", on page 8, appears to be missing information in the emission unit column and the description column. EPA suggests that MDNR complete this table which identifies emission sources subject to Permit Condition 1.

Response to Comment: The table has been updated.

Comment 4: The monitoring/record keeping section of Permit Condition 1, on page 8, includes a reference to the requirements listed in Section IV. However, the major sections of this draft permit are not identified with a Roman numeral. MDNR's customary practice is to identify major sections with Roman numerals.

EPA suggests that this permit be modified to reflect MDNR customary practice. Otherwise, the reference to Section IV should be removed.

Response to Comment: The "style" numbering (format) was lost somewhere along the way to the publication for public notice. The "style" (formatting) will hopefully remain throughout its final printing.

Comment 5: Permit Condition 1, for "VVVV Sources," refers to the "Administrator" in several locations in the monitoring, compliance demonstration, and reporting sections. EPA believes that the more appropriate reference should be "Director," unless MDNR has not taken on delegation of this MACT standard.

Response to Comment: Missouri state rule 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations, states at section (2):

(2) Definitions. Certain terms used in 40 CFR part 63 refer to federal officers, agencies, and publications. The following terms applicable to Missouri shall be substituted where appropriate for the delegable federal counterparts:

(A) Director shall be substituted for Administrator;

Therefore, no change has been made, even though Missouri has been delegated this MACT standard.

Comment 6: The Control Device column for Emission Unit EU0060 in the table of "Surface Coating Operations," preceding Permit Condition 1 for "Surface coating Operations" on page 18, indicates a "Mat Filter" is the control device for this emission unit. However, the description of this emission unit says the Multi-Purpose Booth is equipped with a "panel filter."

EPA suggests that MDNR correct this discrepancy.

Response to Comment: The difference has been addressed.

Comment 7: The description of EU0090-110 in the Carpet Gluing table appears to have two (2) different font sizes and EPA suggests that MDNR review and correct.

Response to Comment: We appreciate formatting consistency, and we will make this change.

Comment 8: Item 1) in the Emission Limitations section of Permit Condition 1 for Painting Sources refers to the "Application for Authority to Construct, Lowe Boats, Inc."

EPA suggests that MDNR include language to indicate that "Lowe Boats, Inc." is now known as "Brunswick Freshwater Group."

Response to Comment: The suggested addition has been included.

Comment 9: The Statement of Basis section titled Other Air Regulations Determined Not to Apply to the Operating Permit presents a reason why 10 CSR 10-6.400, Restriction Emissions of Particulate Matter From Industrial Processes does not apply and refers the permittee to Enclosure A for the reasons for the process exemption. However, Enclosure A is not available for review to verify appropriateness. The implication in the brief write-up in the Statement of Basis appears to reflect that exemption 14 is being used. Exemption 14 allows an exemption for "Coating operations equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers' specifications or comparable maintenance procedures that meet or exceed manufacturers' specifications." This however, does not exempt the "Plywood Cutting," Emission Unit EU0010.

Therefore EPA suggests that MDNR revise the draft permit to include an emission limitation for the "Plywood Cutting" emission unit to restrict emission of particulate matter and make Enclosure A available for public comment.

Response to Comment: The brief explanation makes no reference to Exemption 14. There are several other exemptions in the rule that refer to control devices, either directly or indirectly. That being said, the explanation does lack sufficient specificity for the determination, and of course as pointed out, Enclosure A is missing. Therefore the explanation has been corrected and Enclosure A has been included. However, there are no changes made to the operating permit, since the original determination is correct.

Comment 10: The Statement of Basis section titled MACT Applicability indicates that: 1) 40 CFR Part 63, Subpart VVVV, National Emission Standards for Hazardous Air Pollutants/or Boating Operations is included as Permit Condition PW002. However, the draft Part 70 operating permit out for public comment does not include a Permit Condition PW002. Also, the title of this MACT Standard is National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.

EPA suggests that MDNR modify this section of the Statement of Basis to refer to the correct Permit Condition and correct the MACT Standard title.

Response to Comment: The commenter is correct and the errors in the Statement of Basis have been corrected.