



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: OP2009-007
Expiration Date: **MAR 3 2014**
Installation ID: 189-0002
Project Number: 2007-02-078

Installation Name and Address

Chrysler Corporation
Saint Louis South Assembly Plant
1001 North Highway Drive
Fenton, MO 63026
St. Louis County

Parent Company's Name and Address

Chrysler LLC
800 Chrysler Drive
Auburn Hills, MI 48326

Installation Description:

Chrysler's Saint Louis Complex manufactures trucks at the Saint Louis North Assembly Plant (SLNAP) and minivans at the Saint Louis South Assembly (SLSAP). Both plants are served by complex-wide ancillary activities and utilities, including a boiler house. The boilers are permitted under the SLNAP. SLSAP receives raw metal parts and assembles them into vehicles in the body shop. The bodies are then cleaned, primed, and painted. Sanding, spot repair, and sealing is performed as needed as the vans move through the painting process. The vans are then sent to final assembly where engines, transmissions and other parts received by the plant are installed. Final assembly includes initial fueling of the vehicles and the application of additional sealers, deadeners and adhesives. SLSAP is a major source of air pollutants and is subject to federal, state and local regulations. Many of the operations within this installation are subject to special conditions created within permits issued by Saint Louis County. They include plant wide VOC emission limits on an annual, daily and per vehicle produced basis.

MAR - 4 2009

Effective Date


Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Chrysler's Saint Louis Complex manufactures trucks at the Saint Louis North Assembly Plant (SLNAP) and minivans at the Saint Louis South Assembly (SLSAP). Both plants are served by complex-wide ancillary activities and utilities, including a boiler house. The boilers are permitted under the SLNAP. SLSAP receives raw metal parts and assembles them into vehicles in the body shop. The bodies are then cleaned, primed, and painted. Sanding, spot repair, and sealing is performed as needed as the vans move through the painting process. The vans are then sent to final assembly where engines, transmissions and other parts received by the plant are installed. Final assembly includes initial fueling of the vehicles and the application of additional sealers, deadeners and adhesives. SLSAP is a major source of air pollutants and is subject to federal, state and local regulations. Many of the operations within this installation are subject to special conditions created within permits issued by Saint Louis County. They include plant wide VOC emission limits on an annual, daily and per vehicle produced basis.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)*
2002	2.95	0.23	38.63	665.03	32.61	0	75.80
2003	4.13	0.33	54.19	721.80	45.69	0	22.02
2004	2.51	0.20	32.81	587.27	27.72	0	98.32
2005	11.37	0.22	36.01	699.71	30.48	0	101.03
2006	12.53	0.19	31.47	507.80	26.58	0	63.23

*Organic HAPs emitted are reported as VOCs and HAPs.

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU-S010	Body/Paint and Trim/Final Sealers, Adhesives, Foam Injection Booth & Anti-chip Coating Operation (Booth and Oven)
EU-S020	E-Coat System (Tanks and Oven)
EU-S030	Solvent Wiping
EU-S040 & EU S050	Topcoat Operations (North and South Spray Booths and Ovens)
EU-S080	Underbody Deadener Coating Booth
EU-S100	Vehicle Fill Stations
EU-S110	Spot Repair Booth-Paint and Low Bake Repair-Assembly
EU-S120	Solvent Parts Washers (4)
EU-S150	Purge and Cleanup
EU-S160	Regenerative Thermal Oxidizer
EU-S190	Sanding Booths

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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-012	Miscellaneous Solvents & Paint Mix Room
EP-014	Miscellaneous Non-Production Materials (Water Treatment)
EP-017	Natural Gas Heaters & Ovens
EP-018	Phosphating
EP-019	Welding
INSIG-01	Storage Tanks (not including gasoline and windshield fill operations)
INSIG-02	Cooling Towers
INSIG-03	Maintenance Painting/Maintenance Paint Booth
INSIG-04	Dinamec Fluid Bed Oven
INSIG-06	Windshield Fluid Fill Stations

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit:

Saint Louis County Air Pollution Control Program Construction Permit 5908

Saint Louis County Air Pollution Control Program Construction Permit 5909

Saint Louis County Air Pollution Control Program Construction Permit 5910

Saint Louis County Air Pollution Control Program Construction Permit 5911

Saint Louis County Air Pollution Control Program Construction Permit 5912

Saint Louis County Air Pollution Control Program Construction Permit 5954

Saint Louis County Air Pollution Control Program Construction Permit 7048

Saint Louis County 1993 LAER Agreement

Saint Louis County 1999 LAER Agreement:

- Saint Louis County Air Pollution Control Program Construction Permit 6432 (North Plant)
- Saint Louis County Air Pollution Control Program Construction Permit 6433 (North Plant)
- Saint Louis County Air Pollution Control Program Construction Permit 6434 (North Plant)

II. Complex Wide and 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.

The following complex-wide emission limitations (denoted CW) apply to the combination of the SLNAP, the SLSAP, and the Boilerhouse. Limitations specific to the SLSAP follow the complex-wide requirements.

COMPLEX WIDE EMISSION LIMITATIONS

Permit Condition CW-001

10 CSR 10-6.060

Construction Permits Required

Saint Louis County Construction Permits 6432, 6433 & 6434 (1999 LAER Agreement)

Emission Limitation:

1. VOC emissions from the SLNAP, SLSAP, and Boilerhouse combined are limited to 1,890 tons per year on a twelve (12) month rolling total.
2. VOC emissions from the SLNAP, SLSAP, and Boilerhouse combined are limited to 25,771 pounds on a daily basis.

Monitoring/Recordkeeping:

1. Determine and record the amount of VOC containing materials used monthly, and where applicable, the related waste recovery credits on a monthly basis. Maintain a record of the VOC content of the VOC containing materials.
2. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program (STLCO APCP), or its designated agent, at any reasonable time.

Reporting:

1. A monthly VOC emissions report shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, on a monthly basis, no later than thirty (30) days after the end of the calendar month.
2. Submit a written report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

PLANT WIDE EMISSION LIMITATIONS

Permit Condition PW-S01

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant of opacity greater than twenty percent.
2. A source with a twenty percent limit may emit air contaminants with an opacity over twenty percent, but not greater than forty percent for an aggregate length of time not to exceed six (6) minutes in any sixty minutes.
3. Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements, the requirements shall not apply.

Monitoring:

1. Conduct visual emission observations of all subject emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations are required. For emission units where visible emissions are observed, the source representative shall then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then-
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then monthly observations shall be resumed.

Recordkeeping:

1. Maintain records of observation results, noting all subject emission units from which visible emissions (except water vapor) occurred (Attachment A).
2. Maintain records of any equipment malfunctions.
3. Maintain records of any Method 9 test performed in accordance with this permit condition (Attachment B).
4. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources, Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after an exceedance of any of the terms imposed by this regulation, or any malfunction, which could possibly cause an exceedance of this regulation.

Permit Condition PW-S02

10 CSR 10-6.060

Construction Permits Required
1993 LAER Permitting Agreement

Emission Limitation:

VOC emissions are limited to less than 6.98 pounds per vehicle produced, adjusted to account for repainting operations, on a twelve month rolling average.

Monitoring/Recordkeeping:

1. Maintain records of the amount of VOC containing materials used monthly, and where applicable, the related waste recovery credits on a monthly basis. Additionally, maintain records of the VOC content of the VOC containing materials. The average pounds per vehicle VOC emissions shall be calculated from the monthly records.
2. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. A monthly VOC emission reports shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, on a monthly basis, no later than thirty (30) days after the end of the calendar month.
2. Submit a written report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources, Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

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.

<p>Permit Condition - Multiple Emissions Units* 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart III Surface Coating of Automobiles and Light Duty Trucks 40 CFR Part 63 Subpart A General Provisions</p>

* This regulation applies only to all electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, glass bonding adhesive operation, coatings, thinners, adhesives, and deadeners as listed below:

Emission Unit #	Description of Emission Unit
EU-S010	Body/Paint and Trim/Final Sealers, Adhesives, Foam Injection Booth & Anti-chip Coating Operation (Booth and Oven)
EU-S020	E-Coat System
EU-S030	Solvent Wipe
EU-S040 & EU-S050	Topcoat Operations (Main Color Booths and Ovens)
EU-S080	Underbody Deadener
EU-S110	Spot Repair Booth (Paint) and Low Bake Repair Booth (Assembly)
EU-S120	Parts Washers
EU-S150	Purge and Cleanup Operations

Emission Limitation:

1. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operation plus all coatings and thinners, except deadener, sealers, and adhesives not part of glass bonding systems, shall not exceed 0.60 pounds of organic HAP per gallon coating solids deposited, calculated on a monthly averaged basis. [40 CFR §63.3091(a)]
2. At the time of permit issuance, Chrysler demonstrates compliance with the emission limits of 40 CFR §63.3091(a). Chrysler may switch its applicable requirements between emissions limits in §63.3091 (a) or (b) and between the requirements in (b)(i) or (b)(ii), if applicable, at the beginning of any month. The Saint Louis County Air Pollution Control Program shall be notified of this change no later than thirty days after the end of the calendar month the switch occurred. Chrysler must comply with the requirements for the alternate emission limits, which have not been included in this permit, if they choose to switch compliance methods.
3. At the time of permit issuance, Chrysler meets these emission limits without taking credit for add-on controls. The facility may switch between demonstrating compliance with the Auto MACT emission standards with or without credit for the reduction in emissions associated with a particular control device at the beginning of any month. The Saint Louis County Air Pollution Control Program shall be notified of this change no later than thirty days after the end of the calendar month the switch occurred. Chrysler must comply with the requirements for add-on control devices, which have not been included in this permit, if they choose to take credit for them.

4. The organic HAP emissions from sealers and adhesives shall not exceed 0.010 pounds of HAPs per pound of sealers and adhesives (other than glass bonding) used, calculated on a monthly averaged basis. [40 CFR §63.3091(c)]
5. The organic HAP emissions from deadeners shall not exceed 0.010 pounds of HAPs per pound of deadener used, calculated on a monthly averaged basis. [40 CFR §63.3091(d)]
6. The HAP content by weight of each HAP-containing material shall be determined using vendor formulation data. [40 CFR §63.3151(a)4]
7. For solvent blends where neither test data nor manufacturer's data is available, the values in Table 3 or Table 4 of the MACT may be used. However, if the results of a Method 311 test indicate higher values than those listed on Table 3 or Table 4 to this subpart, the Method 311 results will take precedence, unless after consultation, the facility demonstrates to the satisfaction of the enforcement authority that the data from Table 3 or Table 4 are correct. [40 CFR §63.3151(a)5]

Work Practices:

1. The facility must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under the "Emission Limitation" section above. [40 CFR §63.3094(b)] This plan shall, at a minimum, specify practices for:
 - a) Storage of all organic HAPs containing coatings, thinners, cleaning materials, and waste materials in closed containers;
 - b) Minimization of risk of spills of HAPs-containing materials;
 - c) Conveying of HAPs-containing materials in closed containers or pipes;
 - d) Closure of mixing vessels for HAPs-containing materials except during adding to, removing, or mixing the contents;
 - e) Minimization of HAPs emissions during cleaning of storage, mixing, and conveying equipment.
2. The facility must develop and implement a work practice plan to minimize organic HAP emissions from cleaning and purging equipment associated with all coating operations for which emission limits are established under the "Emission Limitation" section above. [40 CFR §63.3094(c)] This plan shall address, at a minimum, each of these operations with one of the listed techniques or an approved alternative:
 - a) Vehicle body wipe,
 - b) Coating line purging,
 - c) Coating systems flushing,
 - d) Cleaning of spray booth grates,
 - e) Cleaning of spray booth walls,
 - f) Cleaning of spray booth equipment,
 - g) Cleaning of external spray booth areas,
 - h) Additional housekeeping measures.

Monitoring/Testing:

The facility must determine the transfer efficiency of each liquid primer surfacer and topcoat coating and all coatings, except deadeners and sealers/adhesives which are not components of glass bonding systems, using ASTM Method D5066-91 or the guidelines presented in "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" or revisions thereafter. The transfer efficiency for a powder coating will be determined by mass balance, accounting for wastage or losses of coating. The facility may assume one-hundred percent

transfer efficiency for the electrodeposition primer, powder primer, glass bonding primers, and glass bonding adhesives. For final repair coatings, the facility may assume forty percent transfer efficiency for air atomized spray and fifty-five percent transfer efficiency for electrostatic and HVLP spray.
[40 CFR §63.3161(g)]

Recordkeeping:

1. The facility must collect and maintain records of data and information specified in §63.3130, including
 - a) A copy of each notification and report submitted to comply with the Auto MACT and any required supporting documentation.
 - b) A record of the work practice plans required by §63.3094(b) and (c) and documentation that you are implementing the plans on a continuous basis. Appropriate documentation may include operational and maintenance records, records of documented inspections, and records of internal audits.
 - c) A current copy of information provided by materials suppliers as needed to determine mass fraction of organic HAPs, the density and the volume fraction of coating solids for each coating, the mass fraction of organic HAPs and the density for each thinner, and the mass fraction of organic HAPs for each cleaning material.
 - d) Monthly records of affected material use and records of calculations that demonstrate compliance with emission limitations.
 - e) A record of the name and volume of each cleaning material used during each month.
 - f) A record of the mass fraction of organic HAPs for each cleaning material used during each month.
 - g) A record of the density for each cleaning material used during each month.
 - h) A record of the date, time, and duration of each deviation, and for each, a record of whether the deviation occurred during a period of SSM.
 - i) Records related to SSM as required by §63.6(e)(iii)-(v).
 - j)-l) Not applicable to Chrysler with current compliance methods.
 - m) Data and calculations to determine transfer efficiency for primer-surfacer and topcoat coatings and for all coatings (except deadener and adhesive and sealer not part of glass bonding operations).
 - n) A record of the work practice plans required by §63.3094(b) and (c) and documentation that they are implemented on a continuous basis. Appropriate documentation may include operational and maintenance records, records of documented inspections, and records of internal audits.
2. Records must be prepared within thirty days of the end of the calendar month for which the records are being kept. [40 CFR §63.3163]
3. Records must be kept in a form suitable and readily available for expeditious review according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or databases. [40 CFR §63.3131(a)]
4. Retain records for the previous sixty-month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. Submit semi-annual compliance reports of any required monitoring to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and EPA Region 7, Missouri Air Compliance Coordinator, 901 N. 5th Street, Kansas City, KS 66101, every six months,

covering the period of January 1 through June 30 and postmarked by July 31; and the period of July 1 through December 31 and postmarked by January 31. The compliance reports should include all instances of deviations from permit requirements in accordance with §63.3120(5) and/or (6); or a statement that there were no deviations from emission limitations, operating limits, or work practices during the reporting period if applicable.

2. Alternatively, these reports may be satisfied by Title V semi-annual monitoring reports required under 70.6(a)(3)(iii)(A), if such reports include all required information concerning deviations from any emission limit, operating limit, or work practice in MACT Subpart III. If the permittee chooses to combine the reports, the report due dates remain July 31 and January 31, as described above.

EU-S010—Body/Paint and Trim/Final Sealers, Adhesives, Foam Injection Booth & Anti-Chip Coating Operation (Booth and Oven)	
General Description*:	Application of body/paint sealers, from which VOCs are emitted in the uniprime (e-coat) and main color ovens. Application of trim/final sealers, from which VOCs are emitted to the atmosphere. Includes tub cell (Stow-N-Go) installation and Purfoam application.
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	EP-001 (2006)
STLCO Construction/Operating Permit #	5916, 5917, 6918

*For descriptive informational purposes only, does not constitute any enforceable conditions.

Permit Condition EU-S010-002
 10 CSR 10-6.060
 Construction Permit 6918

Emission Limitation:

1. Applicator cleaning materials from the Stow-N-Go Sealing Operation shall be captured and stored in a system designed to minimize emissions to the atmosphere.
2. The applicator tip cleaning capture system shall be designed and maintained to minimize tipping or spilling of captured materials.
3. Material waste containers shall be routinely emptied to minimize emissions.

Monitoring/Recordkeeping:

1. Records of the applicator tip cleaning materials shall include the following:
 - a) Material identification
 - b) Formulation VOC content or solvent density
 - c) Material usage for each calendar month
2. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. Required records for this operation shall be included in the monthly VOC emission reports, which shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, on a monthly basis, no later than thirty (30) days after the end of the calendar month.

- Submit a written report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

EU-S020—E-Coat System (Tanks and Oven)	
General Description*:	E-coat system consisting of a dip tank, and an oven, vented to an RTO (EU-S160)
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	EP-002 (2006)
STLCO Construction/Operating Permit #	5908

*For descriptive informational purposes only, does not constitute any enforceable conditions.

<p>Permit Condition EU-S020-001 10 CSR 10-5.330 Control of Emissions from Industrial Surface Coating Operations</p>
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Emission Limitation:

VOCs from the electrocoat process operation shall not be emitted or discharged to the atmosphere in excess of 1.2 pounds of VOC per gallon coating (minus water and non-VOC organic compounds) on the basis of a daily volume weighted average of all coatings.

Monitoring:

The following procedures shall be used for determining the daily volume-weighted average (DAVG_{VW}) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):

- Calculate the DAVD_{VW} of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i + B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

- The composition of the coatings shall be determined by formulation data supplied by the manufacturer or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
- The above daily volume-weighted calculation is not necessary if all coatings used are compliant coatings.

Record Keeping:

1. Records detailing specific VOC sources, as necessary to determine compliance, shall be kept. These may include:
 - a) The type and the quantity of coatings used daily;
 - b) The coating manufacturer's formulation data for each coating;
 - c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
 - d) Test results that determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) The type and quantity of waste solvents reclaimed or discarded daily;
 - f) The quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
2. Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the Saint Louis County Air Pollution Control Program that such records are adequate for the purpose of this rule.
3. Records shall be retained for the previous sixty-month period and made available to the Saint Louis County Air Pollution Control Program, or its designated agent, upon request.

Reporting:

Submit a written report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

Permit Condition EU-S020-002

10 CSR 10-6.070

New Source Performance Regulations

40 CFR Part 60 Subpart MM

Standard of Performance for Automobile and Light Duty Truck Surface Coating Operations

40 CFR Part 60 Subpart A

General Provisions

10 CSR 10-6.060

Construction Permits 6432, 6433, 6434 (1999 LAER Agreement)

Emission Limitation:

VOC emissions from the electrocoat process operation are limited to less than 1.34 pounds per gallon of applied coating solids.

Monitoring:

1. Determine the monthly volume weighted average mass of VOC emitted per volume of applied coating solids.
2. Where compliance with §60.392 is achieved through the use of incineration, temperature measurement devices shall be installed, calibrated, as prescribed by §60.394.
3. At the time of permit issuance, Chrysler meets these emission limits without taking credit for add-on controls. The facility may switch between demonstrating compliance with the NSPS emission standards with or without credit for the reduction in emissions associated with a particular control device at the beginning of any month. The Saint Louis County Air Pollution Control Program shall

be notified of this change no later than thirty days after the end of the calendar month the switch occurred. Chrysler must comply with the requirements for add-on control devices, if they choose to take credit for them.

Recordkeeping:

1. Identify and record the monthly volume weighted average mass of VOC per volume of applied coating solids emitted to the atmosphere.
2. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. Submit a written report to the Saint Louis County Air Pollution Control Program and EPA Region 7 every calendar quarter of each instance in which the volume-weighted average of the total mass of VOCs per volume of applied coating solids (N) is greater than the limit specified under §60.392. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Saint Louis County Air Pollution Control Program semi-annually. This reporting requirement can be fulfilled by the semi-annual monitoring report required by 10 CSR 10-6.065, §(6)(C)1.C in lieu of submitting a separate report.
2. Notify the Saint Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program thirty days in advance of any test by Method 25.
3. A monthly VOC Emissions Report shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, no later than thirty (30) days after the end of the calendar month.

EU-S030—Solvent Wipe	
General Description*:	Plant-wide solvent wiping
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	EP-003 (2006)
STLCO Construction/Operating Permit #	N/A

*For descriptive informational purposes only, does not constitute any enforceable conditions.

<p style="text-align: center;">Permit Condition EU-S030-001 10 CSR 10-6.060 Construction Permits Required 1993 LAER Permitting Agreement</p>

Emission Limitation:

Emissions from production-related solvent wiping shall be limited to 370 tons VOC per year on a twelve-month rolling total.

Monitoring/Recordkeeping:

1. Keep records of solvent usage and waste shipment data sufficient for the calculation of VOC emissions from the solvent wiping operations.
2. Maintain a twelve-month rolling total of VOC emissions from solvent wiping.
3. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

A monthly VOC Emissions Report shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, no later than thirty (30) days after the end of the calendar month.

EU-S040 & EU-S050 — Topcoat Operations (Main Color Booths and Ovens)	
General Description*:	Main color topcoat spray booth (north & south) with water wash overspray control, air flow 91,000 scfm; Main color topcoat spray ovens (north & south), air flow 60,000 scfm connected to RTO (EU-S160)
Manufacturer/Model #:	N/A
EQ Reference # (Year):	EP-004, 005 (2006)
STLCO Construction/ Operating Permit #	5909, 5910, 5911, 5912

*For descriptive informational purposes only, does not constitute any enforceable conditions.

Permit Condition EU-S040 & S050-001 10 CSR 10-5.330 Control of Emissions from Industrial Surface Coating Operations
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Emission Limitation:

VOCs from the topcoat operation shall not be emitted or discharged to the atmosphere in excess of 15.1 pounds per gallon of applied coating solids on an average daily basis on the basis of a daily volume weighted average of all coatings.

Monitoring:

The calculation of daily volume-weighted emission performance for automobile and light duty truck primer surfacer and topcoat operations shall be made according to procedures detailed in the EPA document entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Truck Topcoat Operations" (EPA-450/3-88-018) dated December 1988, or as amended.

Record Keeping:

1. Records detailing specific VOC sources, as necessary to determine compliance, shall be kept. These may include:
 - a) The type and the quantity of coatings used daily;
 - b) The coating manufacturer's formulation data for each coating;
 - c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
 - d) Test results that determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) The type and quantity of waste solvents reclaimed or discarded daily;
 - f) The quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
2. Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the Saint Louis County Air Pollution Control Program that such records are adequate for the purpose of this rule.

- Records shall be retained for the previous sixty-month period and made available to the Saint Louis County Air Pollution Control Program, or its designated agent, upon request.

Reporting:

Submit a written report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

Permit Condition EU-S040 & EU-S050-002

10 CSR 10-6.070

New Source Performance Regulations

40 CFR Part 60 Subpart MM

Standard of Performance for Automobile and Light Duty Truck Surface Coating Operations

40 CFR Part 60 Subpart A

General Provisions

Emission Limitation:

VOC emissions from topcoat operations are limited to less than 12.27 pounds per gallon of applied coating solids [60.392 (a)].

Monitoring:

- Follow the procedures specified in §60.393(c)(2) to determine the monthly volume weighted average mass of VOC emitted per volume of applied coating solids.
- Where compliance with §60.392 is achieved through the use of incineration, temperature measurement devices shall be installed, calibrated, as prescribed by §60.394.
- At the time of permit issuance, Chrysler meets these emission limits without taking credit for add-on controls. The facility may switch between demonstrating compliance with the NSPS emission standards with or without credit for the reduction in emissions associated with a particular control device at the beginning of any month. The Saint Louis County Air Pollution Control Program shall be notified of this change no later than thirty days after the end of the calendar month the switch occurred. Chrysler must comply with the requirements for add-on control devices, if they choose to take credit for them.

Recordkeeping:

- Identify and record the monthly volume weighted average mass of VOC per volume of applied coating solids emitted to the atmosphere.
- Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- Submit a written report to the Saint Louis County Air Pollution Control Program and EPA Region 7 every calendar quarter of each instance in which the volume-weighted average of the total mass of VOCs per volume of applied coating solids (N) is greater than the limit specified under §60.392. If

no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Saint Louis County Air Pollution Control Program semi-annually. This reporting requirement can be fulfilled by the semi-annual monitoring report required by 10 CSR 10-6.065, §(6)(C)1.C in lieu of submitting a separate report.

2. Notify the Saint Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program thirty days in advance of any test by Method 25.
3. A monthly VOC Emissions Report shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, no later than thirty (30) days after the end of the calendar month.

Permit Condition EU-S040 & EU-S050-003

10 CSR 10-6.060
 1993 LAER Permitting Agreement

Emission Limitation:

VOC emissions from topcoat operations are limited to less than 8.45 pounds per gallon of applied coating solids.

Monitoring/Recordkeeping:

1. Identify and record the monthly volume weighted average mass of VOC per volume of applied coating solids emitted to the atmosphere.
2. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

A monthly VOC Emissions Report shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, no later than thirty (30) days after the end of the calendar month.

EU-S080—Underbody Deadener Coating Booth	
General Description*:	Underbody deadener application with dry filters, air flow 50,000 scfm
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	EP-008 (2006)
STLCO Construction/Operating Permit #	5953

*For descriptive informational purposes only, does not constitute any enforceable conditions.

Permit Condition EU-S080-001

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

Emission Limitation:

1. Chrysler South has chosen to comply with paragraph (3)(A)2 of this rule, which establishes particulate matter concentration limits based upon source gas volume (Table 1), rather than the Process Weight Rate equations in paragraph (3)(A)1.

2. The concentration of particulate matter in the exhaust gases shall not exceed the concentration limit specified in Table 1 of the rule. The limit for this emission unit is summarized in the following table:

Emission Unit	Flow (Cubic Ft/Min)	Concentration Limit in Table 1
Underbody Deadener	50,000	0.053

Monitoring/Record Keeping:

1. Records demonstrating compliance with the concentration limit specified in Table 1 of this rule shall be maintained.
2. Records shall be retained for the previous sixty-month period and made available to the Saint Louis County Air Pollution Control Program, or its designated agent, upon request.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

EU-S100—Vehicle Fill Stations	
General Description*:	Vehicle fill stations for initial fueling of vehicles
Manufacturer/Model #:	Initial fill - Synchronetek semi-automated fuel dispensing system with 2 nozzles and 3 back-up nozzles
EIQ Reference # (Year):	EP-010 (2006)
STLCO Construction/Operating Permit #	24563, 24564, 24565, 31494, 31495

*For descriptive informational purposes only, does not constitute any enforceable conditions.

<p>Permit Condition EU-S100-001 10 CSR 10-5.220 Control of Petroleum Liquid Storage, Loading and Transfer</p>
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Emission Limitation/Operational Parameters:

Initial Fueling of Motor Vehicles and Ancillary Refueling Systems

1. Initial fueling systems and ancillary refueling systems are not subject to MO/PETP testing requirements. All other MO/PETP provisions apply.
2. No owner or operator shall install, permit the use of, or maintain any stationary gasoline tank for the purpose of initial fueling of new motor vehicles unless the new motor vehicle is equipped with a U.S. EPA certified Onboard Refueling Vapor Recovery (ORVR) system or the gasoline dispensing system is equipped with a vapor recovery system, capable of a minimum of ninety-five percent (95%) control efficiency.
3. No owner or operator shall install, permit the use of, or maintain any stationary gasoline tank for the purpose of ancillary fueling of motor vehicles unless the motor vehicle is equipped with a U.S. EPA certified Onboard Refueling Vapor Recovery (ORVR) system or the gasoline dispensing system is equipped with a vapor recovery system, capable of a minimum of ninety-five percent (95%) control efficiency.
4. Demonstration of emission capture efficiency of the gasoline dispensing system shall be required and made available to the staff director upon request. The dispensing system shall be approved by the staff director if the system:

- a) Collects the hydrocarbon vapors and gases discharged during initial motor vehicle fueling, storage tank loading, breathing, and working losses;
 - b) Prevents their emission into the atmosphere; and
 - c) Demonstrates a minimum of ninety-five percent (95%) control efficiency for emission reduction of the fuel dispensing operation emissions.
5. Maintain the vapor control system in good working order in accordance with the manufacturer's specifications and with no indication of visible liquid leaks.
 6. Installations containing initial fueling systems and ancillary refueling systems shall allow the department to make vapor recovery inspections at any time to ensure systems are in working order and are being maintained and operated according to permits and regulations and manufacturer recommendations.

Monitoring:

1. Conduct regular preventive maintenance self-inspections of the vapor control system and conduct any necessary repairs upon identification of those defects. The facility must conduct all maintenance specified by manufacturer guidelines. These manufacturer guidelines must be made available to inspectors upon request.
2. Ensure all fueling procedures are conducted in the most efficient manner to reduce emission from drips.
3. Ensure the sealing of the filled vehicle's tank after fueling.

Recordkeeping:

1. Keep records on-site of all self-tests, self-inspections, defects found, repairs, and maintenance activities.
2. Records shall be made available to the staff director within five (5) days of a request.
3. Retain records for the previous sixty (60) month period.

Permits Required:

1. All existing installations must apply to the director for an initial operating permit.
2. The operating permit that covers the initial fueling systems and the ancillary refueling systems shall be incorporated as part of the installation applicable requirements of 10 CSR 10-6.065, Operating Permits.

EU-S110—Spot Repair Booth (Paint) and Low Bake Repair Booth (Assembly)	
General Description*:	Paint: (2) Bay Spot Repair Booth with dry filters (formerly reprocess booth) Assembly: (8) Bay Low Bake Repair Coating Booth with dry filters
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	EP-006, 011 (2006)
STLCO Construction/Operating Permit #	5913, 5915

*For descriptive informational purposes only, does not constitute any enforceable conditions.

Permit Condition EU-S110-001
 10 CSR 10-5.330
 Control of Emissions from Industrial Surface Coating Operations

Emission Limitation:

VOCs from the spot and low bake repair operations shall not be emitted or discharged to the atmosphere in excess 4.8 pounds of VOC per gallon coating (minus water and non-VOC organic compounds) on the basis of a daily volume weighted average of all coatings. (4.8 lbs VOC/gallon coating = 13.8 lbs VOC/gallon solids)

Monitoring:

The following procedures shall be used for determining the daily volume-weighted average (DAVG_{VW}) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):

1. Calculate the DAVG_{VW} of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i + B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation;
 and

n = number of coatings used in a surface coating operation.

2. The composition of the coatings shall be determined by formulation data supplied by the manufacturer or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
3. The above daily volume-weighted calculation is not necessary if all coatings used are compliant coatings.

Record Keeping:

1. Records detailing specific VOC sources, as necessary to determine compliance, shall be kept. These may include:
 - a) The type and the quantity of coatings used daily;
 - b) The coating manufacturer's formulation data for each coating;
 - c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;

- d) Test results that determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) The type and quantity of waste solvents reclaimed or discarded daily;
 - f) The quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
2. Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the Saint Louis County Air Pollution Control Program that such records are adequate for the purpose of this rule.
 3. Records shall be retained for the previous sixty-month period and made available to the Saint Louis County Air Pollution Control Program, or its designated agent, upon request.

Reporting:

Submit a written report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

Permit Condition EU-S110-002

10 CSR 10-6.400

Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

1. Chrysler South has chosen to comply with paragraph (3)(A)2 of this rule, which establishes particulate matter concentration limits based upon source gas volume (Table 1), rather than the Process Weight Rate equations in paragraph (3)(A)1.
2. The concentration of particulate matter in the exhaust gases shall not exceed the concentration limit specified in Table 1 of the rule. The limit for this emission unit is summarized in the following table:

Emission Unit	Flow (Cubic Ft/Min)	Concentration Limit in Table 1
Spot Repair Booth Paint	185,360	0.034
Low Bake Repair Booth Assembly	21,670	.062

Monitoring/Record Keeping:

1. Records demonstrating compliance with the concentration limit specified in Table 1 of this rule shall be maintained.
2. Records shall be retained for the previous sixty-month period and made available to the Saint Louis County Air Pollution Control Program, or its designated agent, upon request.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

EU-S120—Solvent Parts Washers	
General Description*:	(1) Sealant pump cleaning (MACT) (located in old maintenance building), (3) solvent parts washers located as follows—(1) spot repair (MACT), (1) Jitney repair (non-MACT), (1) paint mix (MACT)
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	N/A
STLCO Construction/Operating Permit #	5668, N/A

*For descriptive informational purposes only, does not constitute any enforceable conditions.

<p>Permit Condition EU-S120-001 10 CSR 10-5.300 Control of Emissions from Solvent Metal Cleaning</p>

Emission Limitations:

1. Equipment specifications (Section (3)(A)1, Cold Cleaners):
 - a) The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)). [Per 10 CSR 10-5.300(1)(D)2.B., cold cleaners using solvents regulated under any federal NESHAP shall be exempt from the solvent vapor pressure requirement].
 - b) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors while in the closed position, or enclosed reservoir, which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner.
 - c) Exemptions under (1)(D) of the regulation may apply.
 - d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the director.
 - e) When one (1) or more of the following conditions exist, the design of the cover shall be such that it can easily be operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system).
 - i) The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F)
 - ii) The solvent is agitated.
 - iii) The solvent is heated.
 - f) A drainage facility allowing parts to drain while the cover is closed is required.
 - g) If an internal drainage facility as in (f) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
 - h) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard.
 - i) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
 - j) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must have one (1) of the following control devices:
 - i) A freeboard ratio of at least 0.75
 - ii) Water cover (solvent must be insoluble in and heavier than water)

- iii) Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65%) and is approved by the director prior to use.
2. Operating procedures (Section (3)(B)1 Cold Cleaners):
 - a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
 - b) Cleaned parts shall be drained in the free board area for fifteen (15) seconds, or until dripping stops, whichever is longer.
 - c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until trained service personnel are able to restore operation within the established parameters.
 - d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
 - e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable.
 - f) Waste solvent shall be stored in closed containers only.
 3. Operator and Supervisor Training (Section (3)(C)):
 - a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
 - b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
 - c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months.

Monitoring/ Record Keeping:

1. Monthly records of the following shall be maintained:
 - a) Types and amounts of solvent containing waste material from cleaning or degreasing operations:
 - i) Transferred to a contract reclamation service or disposal facility
 - ii) Distilled on the premises
 - b) Maintenance and repair logs for the cold cleaner and any associated control equipment.
2. For cold cleaners subject to (3)(A)1 (a) or (b) the following records for each purchase of cold cleaning solvent shall be maintained:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in millimeters of Mercury (mmHg) at twenty degrees Celsius (20° C) (sixty-eight degrees Fahrenheit (68° F)).
3. Keep a record of the cold cleaner training for each employee.
4. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the discovery of any exceedance of the cold cleaner requirements established in 10 CSR 10-5.300.

EU-S150—Purge and Cleanup	
General Description*:	Spray gun tip purging and booth cleaning
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	EP-015 (2006)
STLCO Construction/Operating Permit #	N/A

*For descriptive informational purposes only, does not constitute any enforceable conditions.

<p style="text-align: center;">Permit Condition EU-S150-001 10 CSR 10-6.060 1993 LAER Permitting Agreement</p>

Emission Limitation:

Emissions from spray gun tip purging and booth cleaning shall be limited to 300 tons VOC per year on a twelve-month rolling total.

Monitoring/Recordkeeping:

1. Maintain solvent usage and waste shipment records sufficient for the calculation of VOC emission from the purging and clean-up operations.
2. Maintain twelve-month rolling total of VOC emissions from purging and clean-up operations.
3. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

A monthly VOC Emissions Report shall be submitted either electronically or in hard-copy form to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, no later than thirty (30) days after the end of the calendar month.

EU-S160—Regenerative Thermal Oxidizer	
General Description*:	Low NOx regenerative thermal oxidizer, natural gas fired, 10 MMBtu/hr, air flow 98,000 scfm
Manufacturer/Model #:	Salem Engelhart
EIQ Reference # (Year):	EP-016 (2006)
STLCO Construction/Operating Permit #	7048

<p style="text-align: center;">Permit Condition EU-S160-001 10 CSR 10-6.060 Construction Permits Required St Louis County Construction Permit 7048</p>

Monitoring:

1. The most recent stack test, January 27, 2005, established a minimum operating temperature of 1400 degrees Fahrenheit (fifty degrees below the average combustion temperature during the test, 1450°F). Subsequent stack tests, approved by the Saint Louis County Air Pollution Control Program, may establish a different minimum operating temperature.

2. The regenerative thermal oxidizer's incineration chamber shall be continuously monitored using a thermocouple, or equivalent approved by the Saint Louis County Air Pollution Control Program. The regenerative thermal oxidizer shall be equipped with an audible alarm that will activate whenever the combustion chamber temperature falls below the minimum setting established in the stack testing.
3. Continuous temperature monitoring and recording of the regenerative thermal oxidizer is required at all times when the regenerative thermal oxidizer is on line.
4. The thermocouples measuring the regenerative thermal oxidizer shall be calibrated or replaced on an annual basis. If a thermocouple is calibrated using a second thermocouple, Chrysler must demonstrate that the continuous thermocouple is within plus or minus thirty (30) degrees Fahrenheit of the calibration unit.

Record Keeping:

1. Maintain continuous temperature records. Records may be kept electronically.
2. Maintain records of instances when alarm is activated and all records of inspections, maintenance and repair of the regenerative thermal oxidizers.
3. Retain records for the previous sixty (60) month period and make them available to the Saint Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. Should the temperature fall below the minimum setting established by testing during coating operations for more than a two (2) hour period, Chrysler shall notify the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, within twenty-four hours. A written report shall follow the verbal notification within ten days, indicating the cause of the failure and the corrective action taken.
2. Should the temperature fall below the minimum settings, established by testing, more than three (3) times in any three (3) month period or more than six (6) times in any twelve (12) month period; the Saint Louis County Air Pollution Control Program shall be inspected, adjusted and/or repaired. The Saint Louis County Air Pollution Control Program reserves the right to waive this requirement if satisfied that Chrysler has adequately addressed the cause of the failures.

EU-S190—Sanding Booths	
General Description*:	Full body repair sanding booth with dry filters, air flow 650; E-Coat sanding booth with dry filters, air flow 947 scfm; Main color sanding booth with dry filters, air flow 1,519 scfm.
Manufacturer/Model #:	N/A
EIQ Reference # (Year):	N/A
STLCO Construction/Operating Permit #	5544, 5545, 5546

*For descriptive informational purposes only, does not constitute any enforceable conditions.

<p>Permit Condition EU-S190-001 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes</p>
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Emission Limitation:

Compliance with this regulation may be based upon source gas volume as described in Section (3)(A)2 of the rule or process weight rate equations included in Section (3)(A)1. Should Chrysler utilize the source gas volume option, the concentration of particulate matter in the exhaust gases shall not exceed the concentration limit specified in Table 1 of the rule, which has been summarized for these emission units in the following table:

Emission Unit	Flow (Cubic Ft/Min)	Concentration Limit in Table 1 (Grains/Cubic Ft)
EU-190, Full Body Repair (Reprocess) Sanding Booth	650	0.1
EU-190, E-Coat Sanding Booth	947	0.1
EU-190, Main Color Sanding Booth	1,519	0.1

Monitoring:

1. Maintain and operate the filters in good working order.
2. Conduct monthly inspections of the filters.

Record Keeping:

3. Records demonstrating compliance with the concentration limit specified in Table 1 of this rule shall be maintained.
4. Records of the monthly filter inspections and replacement dates shall be maintained.
5. Records shall be retained for the previous sixty-month period and made available to the Saint Louis County Air Pollution Control Program, or its designated agent, upon request.

Reporting:

Report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Restrictions

The open burning of tires, petroleum-based products, asbestos containing materials, trade waste, refuse and vegetative debris is prohibited.

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 ten 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 Section 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo, to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

10 CSR 10-6.100 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 complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be due on the date specified by 10 CSR 10-6.110(3)(D)F each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

- 1) The permittee shall not cause or allow 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 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.

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. Qualified personnel shall perform all tests.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

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

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 10-6.075, “Maximum Achievable Control Technology Regulations;” 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.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the Saint Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with twenty (20) or more volumes of odor-free air; or
- 3) Premises other than those in paragraphs (1)A.1. and 2. of the rule when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when thirty percent (30%) or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least twenty (20) people or seventy-five percent (75%) of those exposed if fewer than twenty (20) people are exposed.

10 CSR 10-5.450 Coating of VOC Emissions from Traffic Coatings

- 1) No person shall supply, sell, offer for sale, apply, or solicit the application of any traffic coating, which at the time of sale or manufacture contains more than 1.26 pounds VOC per gallon, excluding water, exempt compounds, and any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the Saint Louis metropolitan area without the approval of the staff director.
- 2) All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to, being accessed, filled, emptied, or repaired.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing fifty 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.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

V. Saint Louis County Air Pollution Control Code Requirements

Section 612.040, Air Quality Standards and Air Pollution Control Regulations

Saint Louis County Air Pollution Control Program may enforce Missouri Code of State Regulations as adopted and promulgated by the Air Conservation Commission of the State of Missouri consisting of Title 10, Division 10, Chapters 5 and 6.

Section 612.100, Emergency Abatement of Violation

By written approval of the County Executive, any facility indirectly or directly discharging any air contaminant in violation of the Saint Louis County Air Pollution Control Code where it is the opinion of the director that the discharge creates an emergency which requires immediate action to protect the public health, shall order the person in writing to discontinue immediately.

Section 612.110, Permits Required

The permittee shall obtain Missouri Department of Natural Resources Air Pollution Control Program operating permits for its installation. The permittee shall not commence construction, modification, or major modification of any installation subject to this rule without obtaining a permit from Missouri Department of Natural Resources Air Pollution Control Program.

Section 612.120, Permits to be Visibly Affixed or Placed

The permittee shall visibly affix Missouri Department of Natural Resources Air Pollution Control Program Permit on or near permitted equipment.

Section 612.200, Testing Prior to Granting of Operating Permit

- 1) *Emission Standards:* Before an authority to construct or permit to operate is granted, the director may require the applicant to conduct tests to determine the kind or amount of the air contaminant emitted from the equipment. Such tests shall be conducted, reviewed and certified by a licensed engineer. The permittee shall notify the County of the time and place of testing for the purpose of witnessing the test.
- 2) *Record Keeping Requirements:* Records shall be kept during testing as approved in a test protocol submitted to the County prior to testing.
- 3) *Monitoring Requirements:* Monitoring during testing shall be as approved in a test protocol submitted to the County prior to testing.
- 4) *Reporting Requirements:* The permittee shall report to the Missouri Department of Natural Resources Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any condition which could possibly cause an exceedance of this regulation.

Section 612.220, Suspension or Revocation of Permits

The director may suspend or revoke a permit to operate or authority to construct for willful or continued violation of the Saint Louis County Air Pollution Control Code

Section 612.250 Fees, When Payable, Exceptions

Fees for authority to construct and operating permits in the amounts provided in Section 612.260 shall be paid to the director except as provided in Subsections 3 and 4 of this rule.

Section 612.260, Schedules

The permittee shall pay Saint Louis County Construction Permit fees when applicable and annual Operating Permit fees in accordance with the rule.

Section 612.280, Testing by Order of the Board

- 1) *Emission Standards:* If any article, machine, equipment or other contrivance is in violation of the Saint Louis County Air Pollution Code, the Director may file with the Board for its approval an order directing the permittee of such equipment to conduct such tests as are necessary in the opinion of the director and approved by the Board to determine whether the equipment is in violation of this Code.
- 2) *Monitoring/Record Keeping Requirements:* The entire test results shall be reviewed and certified by an engineer licensed under Chapter 327, RSMo 1959. The engineer shall be selected by the permittee and approved by the Board.
- 3) *Reporting Requirements:* The permittee shall give at least (7) days notice prior to the commencement of the test. The permittee shall report to the Missouri Department of Natural Resources Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017.

Section 612.290, Right of Entry; Inspections; Samples

The permittee shall allow the director or his agent to enter at all times with reasonable notice, inspect any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants, inspect any records relating to the use of any equipment or control apparatus which affect or may affect the emission of air contaminants, and sample any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants.

Section 612.310, Upset Conditions, Breakdown or Scheduled Maintenance

The permittee shall report to the Missouri Department of Natural Resources Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, within twenty-four hours of occurrence of any unavoidable upset in or breakdown of equipment and in case of shutdown for necessary scheduled maintenance, the intent to be shutdown shall be reported to the Missouri Department of Natural Resources Air Pollution Control Program twenty-four hours prior to shutdown.

Section 612.340, Air Pollution Nuisances Prohibited

It is unlawful for the permittee to cause such quantities of soot, cinders, noxious acids, fumes and gases or other particulate matter from whatever source in such place or matter as to be detrimental to any person or the public or to endanger the health, comfort and safety of any person or the public, injury or damage to property or business.

Section 612.380, Interfering with or Obstructing Division Personnel

No person shall hinder, resist, interfere with or obstruct the director or any division employee in carrying out any duty for the director or the Board.

Section 612.530, Saint Louis County Air Pollution Control Program Asbestos Abatement Rules and Regulations—Registration, Notification and Performance Requirements

The permittee shall conduct all asbestos abatement projects within the procedures and requirements established in Section 612.530.

V. General Permit Requirements

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

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

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Saint Louis County Air Pollution Control Program or Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) Semi-annual Monitoring Reports
 - i) The permittee shall submit a semi-annual report of all required monitoring by:
 - (1) October 1st for monitoring which covers the January through June time period, and
 - (2) April 1st for monitoring which covers the July through December time period.
 - ii) Each semi-annual monitoring report must identify any deviations from permit requirements since the previous report that have been monitored by the monitoring systems required under the permit, and any deviation from the monitoring, record keeping and reporting requirements of the permit.
 - iii) These reports shall be submitted to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
 - b) Annual Compliance Certification
 - i) The permittee shall submit an annual report of all required monitoring by:
April 1st for monitoring which covers the January through December time period, and
 - ii) These reports shall be submitted to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and EPA Region 7, Missouri Air Compliance Coordinator, 901 N. 5th Street, Kansas City, KS 66101.
 - c) Supplemental Reports
 - i) 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.

- ii) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two (2) 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.
- iii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iv) Any other deviations identified in the permit as requiring more frequent reporting than the 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.
- d) 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.
- e) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification, or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of required records. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

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

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:

- 1) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; **Please Note:** Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
- 2) The permittee must provide written notice of the change to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
- 3) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

Tyree Minner, Plant Manager, was established as the responsible official for SLSAP in the updated initial application received on January 29, 2007. The Air Pollution Control Program was informed that Frank Gualdoni is now the responsible official. 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 Saint Louis County Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within thirty days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Saint Louis County Air Pollution Control Program, the Missouri Department of Natural Resources, or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) Saint Louis County Air Pollution Control Program, the Missouri Department of Natural Resources, or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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.

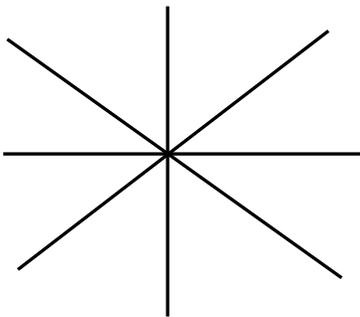
VII. Attachments

ATTACHMENT B: Visible Emission Method 9 Observation Form

This compliance worksheet may be used to meet the record keeping requirements for Permit Condition PWS01.

Source Name _____
 Address _____
 Observation Point _____
 Stack Identification _____
 Stack: Distance from _____ Height _____
 Temp _____ %RH _____
 Sky Condition _____
 Color of Emission _____

Quadrant: Draw symbols below in appropriate place to mark wind direction and speed, observer's location and sun location.



(Stack is at center)

Observer _____
 Observer's
 Signature _____
 Date _____ Certification Date _____
 Observer Began _____ Ended _____

COMMENTS:

	0	15	30	45		0	15	30	45
0					41				
1					42				
2					43				
3					44				
4					45				
5					46				
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40					80				

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 January 29, 2007
2. Part 70 Operating Permit Application, received April 26, 1999
3. 2002 through 2006 Emissions Inventory Questionnaires
4. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
5. Saint Louis County Air Pollution Control Program Operating Permit 5544
6. Saint Louis County Air Pollution Control Program Operating Permit 5545
7. Saint Louis County Air Pollution Control Program Operating Permit 5546
8. Saint Louis County Air Pollution Control Program Operating Permit 5668
9. Saint Louis County Air Pollution Control Program Operating Permit 5913
10. Saint Louis County Air Pollution Control Program Operating Permit 5915
11. Saint Louis County Air Pollution Control Program Operating Permit 5916
12. Saint Louis County Air Pollution Control Program Operating Permit 5917
13. Saint Louis County Air Pollution Control Program Operating Permit 5953
14. Saint Louis County Air Pollution Control Program Operating Permit 6918
15. Saint Louis County Air Pollution Control Program Construction Permit 1721
(Operating Permit 5727)
16. Letter from Terry Tecklenburg at Chrysler notifying Saint Louis County of completion of remediation activities subject to MACT Subpart GGGGG; received December 22, 2007
17. Letter from Ken Koon at the Missouri Department of Natural Resources stating that no further action is required for UST Basin; received December 22, 2007
18. Letter from Terry Tecklenburg of Chrysler stating all vehicles using executive pumps are equipped with ORVR, received February 20, 2008
19. Letter from Tim Froeschner of Saint Louis County to Mr. Kaneski of Chrysler, dated April 10, 2002, stating that source specific VOC limits for SLSAP on a pound per vehicle basis established in Construction Permits 5913, 5914, 5915, 5916, 5917 and 5953 were superseded in the 1993 LAER agreement and are, therefore, no longer in effect
20. Chrysler South Plant AST/UST Summary provided by Terry Tecklenburg, received June 6, 2008

Chrysler South Plant Tank Summary*

Tank ID#	Capacity (gallons)	Construction	Location	Contents	Installation Date
USTs					
1	19,754	Double Wall Steel	Underground Tank Farm	Gasoline	1995
2	19,754	Double Wall Steel	Underground Tank Farm	Gasoline	1995
3	19,754	Double Wall Steel	Underground Tank Farm	Gasoline	1995
4	19,754	Double Wall Steel	Underground Tank Farm	Automatic Transmission Fluid	1995
5	14,815	Double Wall Steel	Underground Tank Farm	Antifreeze	1995
6*	14,815	Double Wall Steel	Underground Tank Farm	Empty	1995
7	14,815	Double Wall Steel	Underground Tank Farm	Diesel Fuel	1995
8	19,754	Double Wall Steel	Underground Tank Farm	Automatic Transmission Fluid	1999
9	19,754	Double Wall Steel	Underground Tank Farm	Antifreeze	1999
ASTs					
10	2,000	Double Wall Steel	Underground Tank Farm	Diesel Fuel	2001
1	12,050	Single Wall Fiberglass	Phosphate E-Coat	Resin	1983
2	7,695	Single Wall Fiberglass	Phosphate E-Coat	Pigment	1983
9	7,695	Single Wall Fiberglass	Phosphate E-Coat	Chemkleen 370	1983
10	7,695	Single Wall Fiberglass	Phosphate E-Coat	Chemfoss 700R	1983
13	110	Single Wall Polypropylene	Phosphate E-Coat	Anti-Scalent	1983
14	185	Single Wall Polypropylene	Phosphate E-Coat	Sulfuric Acid	2005
1	7,000	Single Wall Steel	Waste Mgmt. Building	South Plant Slop Solvents	1998
2	7,000	Single Wall Steel	Waste Mgmt.	North Plant Slop Solvents	1998
3	7,000	Single Wall Steel	Waste Mgmt.	Waste Purge Solvents	1998
1	5,500	Single Wall Polypropylene	North Wall Assembly Plt.	Paint Detackifier	Unknown
2	6,337	Single Wall Steel	North Wall Assembly Plt.	R-134A Refrigerant	Unknown
3	6,000	Single Wall Steel	North Wall Assembly Plt.	Argon	Unknown

*Above information represents contents at time of permit issuance. Contents in tanks are subject to change.

Applicable Requirements Included in the Operating Permit but Not in the Application

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

10 CSR 10-5.040, Use of Fuel in Hand-Fired Equipment Prohibited

All facilities in the non-attainment area are subject to this rule. This rule applies as indicated in Section IV, Core Permit Requirements.

10 CSR 10-5.250, Time Schedule for Compliance

This requirement is applicable; however, it is administrative and therefore not listed in the facility wide requirements.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.030, Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

This rule restricts the emission of particulate matter from fuel burning equipment used for indirect heating except where 10 CSR 10-6.070 would be applied. This facility does not have fuel-burning equipment used for indirect heating.

10 CSR 10-5.120, Information on Sales of Fuels to be Provided and Maintained

This rule is not applicable because the facility does not use coal or residual fuels for heating.

10 CSR 10-5.130, Certain Coals to be Washed

This rule is not applicable because the facility does not use coal.

10 CSR 10-5.290, More Restrictive Emission Limitation for Particulate Matter in the South Saint Louis Area

This rule is not applicable because this plant is not located within the geographic boundaries established by this rule.

10 CSR 10-5.330, Control of Emissions From Industrial Surface Coating Operations

This rule is not applicable to INSIG-03, Maintenance Paint Booth because maintenance painting is not considered an industrial surface coating operation.

10 CSR 10-5.370, Control of Emissions From the Application of Deadeners and Adhesives

This rule is not applicable to the SLSAP because the uncontrolled potential to emit of VOCs from deadeners and adhesives does not exceed 100 tons per year. In addition, the adhesives used at this plant are not vinyl top adhesives, which are the only type of adhesives with an applicable emission limit.

10 CSR 10-5.455, *Control of Emission from Solvent Cleanup Operations*

This rule is not applicable to Chrysler South in accordance with Section (2)(C)6 of the Rule, which exempts cleaning operations for which there has been made a LAER determination. LAER limits exist for both the solvent wiping operation and purge and cleanup operations at this plant.

10 CSR 10-5.500, *Control of Emissions from Volatile Organic Liquid Storage*

The rule does not apply to Chrysler South Plant because the facility does not contain any stationary tank, reservoir or other container of 40,000 gallon capacity or greater that contains a volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater.

10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides*

The natural gas heaters were exempt from this rule at the time of permit issuance in accordance with Section (1)(C)9 because none of them have individually exceeded thirty tons of NO_x emissions since the rule was promulgated in 2000. If any of the emission units exceed this threshold at any time, they will become subject to this rule. The regenerative thermal oxidizer is exempt from this rule in accordance with Section (1)(C)7.

10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions from Existing Major Sources*

According to Section (1)(A) through (C), this rule does not apply to any installation that meets one the following:

1. One or more rules under Division 10, Chapter 5, of the Code of State Regulations (CSR) applies to VOC emissions from a product process, or a raw material, intermediate or product tank;
2. Is exempted from one or more rules under Division 10, Chapter 5, of the CSR as they apply to VOC emissions from a product process, or a raw material, intermediate or product tank;
3. Is affected by any federal rulemaking promulgated under 40 CFR Part 60, 40 CFR Part 61, or 40 CFR Part 63 that applies to VOC emissions from a product process, or a raw material, intermediate or product tank;

This rule does not apply to Chrysler South Plant because the installation meets the above criteria.

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

This rule is not applicable to EP-017, INSIG-04, EU-S010, EU-S020, EU-S040, EU-S050, or EU-S060 due to the exemption for equipment that uses exclusively pipeline grade natural gas in Section (1)(A)2 of the rule.

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

The Dinamec Fluid Bed Oven, INSIG-04 is not subject to this regulation based on stack testing of an identical unit located in Mapleton, GA. Emissions from the operation were four tenths (0.4) of a pound of particulate per hour, assumed to be less than ten microns in size. Per Section (1)(B)11 of this rule, 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.

This rule does not apply to EU-S020, E-Coat Operation because it is a dip operation and does not have the potential to cause any emission of particulate matter.

This rule is not applicable to INSIG-03, Maintenance Paint Booth due to the exemption found in 10 CSR 10-6.400(B)8 for emission sources that are exempt from construction permitting under 10 CSR 10-6.061. Maintenance painting is an exempt activity per 10 CSR 10-6.061(3)(B)5.

According to the "Purpose" section of this rule, this regulation restricts the emission of particulate matter in the source gas of an operation or activity except where 10 CSR 10-5.030 and/or 10 CSR 10-6.070 would be applied. EU-S040 & S050 are subject to the requirements of 10 CSR 10-6.070 (NSPS) and are therefore exempt from this regulation.

Construction Permit Revisions

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

The Reprocess Booth (Construction Permit 5913) was renamed to Spot Repair Booth (Paint) because Chrysler no longer uses this booth as a reprocess booth. Additionally, this booth was listed as subject to the topcoat LAER limit of 15.1 pounds of VOC per gallon of applied coating solids in the Title V Application, but should have been listed as subject to the spot repair RACT limit of 13.8 pounds of VOC per gallon of coating solids.

EU-S190 Sanding Booths (Construction Permits 5544, 5545, and 5546) were modified to correct the flow rates on these permits. Flow rates have changed since the issuance of these permits due to a complex-wide decrease in airflow to conserve energy.

EU-S100, Vehicle Fill Stations, was modified to remove the underground tanks and the auxiliary fueling station (Operating Permits 10109, 10110, 10111, and 20571) from the SLSAP and move them to the SLNAP. Chrysler requested this change in organization because the SLSAP will be idle starting October 31, 2008.

NSPS Applicability

40 CFR Part 60, Subpart K, Ka, Kb, *Standards of Performance for Storage Vessels for Petroleum Liquid*, does not apply to this facility because there are no storage vessels located at this facility that meet the construction date, volume and/or content criteria of the regulations.

40 CFR Part 60 Subpart MM, *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations*, applies to each prime coat operation, guide coat operation and topcoat operation as described in the permit.

EU-S020, E-Coat Operation, and EU-S040-S060, Topcoat Operations, are subject to this rule; however, the 1993 LAER agreement establishes a more stringent VOC emission limitation of 1.34 and 8.45 pounds per gallon of applied coating solids instead of the 1.42 and 12.27 pounds per gallon of applied coating solids established in Subpart MM. The NSPS and LAER requirements were combined for the E-Coat Operation with the more stringent VOC

emission limitation included in the permit condition since it would not make a difference in the monitoring, reporting and record keeping requirements of Permit Condition EU-S020-002. However, the limits were separated for the Topcoat Operations since the regenerative thermal oxidizer must be operated to meet the LAER limit, but not the NSPS limit.

MACT Applicability

40 CFR Part 63 Subpart Q, *Industrial Process Cooling Towers*, does not apply to the cooling towers listed as insignificant activities in the Part 70 permit application since the cooling towers do not use chromium based water treatment chemicals.

40 CFR Part 63 Subpart T, *Halogenated Solvent Cleaning*, does not apply to the solvent cleaning since the solvent cleaning emission units do not use halogenated solvent as defined in 40 CFR 63.460.

40 CFR Part 63 Subpart EEEE, *Organic Liquids Distribution*, applies to the Chemkleen 370 Tank located at this facility. However, the tank is exempt from control requirements due to the vapor pressure of the tank contents (<4 psia). If the vapor pressure exceeds this threshold, the tank must be controlled. Only an initial notification and initial compliance report are required if there are no changes. These reports were submitted on June 4, 2004 and July 26, 2007.

40 CFR Part 63 Subpart IIII, *Automobile and Light Duty Truck Surface Coating*, applies to the installation as indicated in the permit. The Initial Notification was received on May 13, 2002.

40 CFR Part 63 Subpart MMMM, *Surface Coating of Miscellaneous Metal Parts and Products*, does not apply due to 63.3881(c)(17)(d). They comply with MACT Subpart IIII in lieu of this rule.

40 CFR Part 63 Subpart PPPP, *Plastic Parts and Products*, does not apply due to 63.4481(c)(16)(d). They comply with MACT Subpart IIII in lieu of this rule.

40 CFR Part 63 Subpart GGGGG, *Site Remediation*, previously applied to the installation, but is no longer applicable. On December 19, 2007, Saint Louis County received a letter from Chrysler notifying us that the Chrysler South Assembly Plant had completed its Underground Storage Tank remediation activity. Per §63.7881(d), “Your site remediation is not subject to the requirements of this subpart if all remediation activities at your facility subject to this subpart are completed and you have notified the Administrator in writing that all remediation activities subject to this subpart are completed. You must maintain records of compliance, in accordance with §63.7953, for each remediation activity that was subject to this subpart. All future remediation activity meeting the applicability criteria in this section must comply with the requirements of this subpart.”

40 CFR Part 63 Subpart CCCCC, *Gasoline Dispensing Facilities*, does not apply to this facility since Chrysler is not an area source of HAPS according to the following definition from 40 CFR Part 63 Subpart A: “Area source means any stationary source of hazardous air pollutants that is not a major source as defined in this part.”

NESHAP Applicability

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition sections of the subpart, which makes the subpart applicable to all sources. It is included as a core permit requirement.

Other Regulatory Determinations

The Title V Permit Application lists a limit of 8.45 pounds VOC per vehicle, which is incorrect. The plant-wide limit is 6.98 pounds VOC per vehicle.

The 1993 LAER agreement established VOC limits of 1,291 tons annually and 11,726 pounds daily. These limits are no longer in effect, as they were superseded by the 1999 LAER agreement.

Calculations

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

Chrysler South has chosen to comply with paragraph (3)(A)2 of this rule, which establishes particulate matter concentration limits based upon source gas volume

Chrysler South PM Emissions

Emission Point	MHDR PM10 Emissions (lbs) (before control)	Emission Factor (#PM/hr per station)	Stations	Vacuum Emissions	Booth Emissions	Fugitive Emissions	MHDR PM10 Emissions (lbs) (after control)	Grains/Lb	Min/Hr	Flow (Cubic Ft/Min)	Concentration Grains/Cubic Ft	Concentration Limit in Table 1 (Grains/Cubic Ft)
Reprocess (Full Body Repair) Sanding Booth	0.384	0.096	4	0.003456	0.02419	0.00384	0.031488	7,000	60	650	0.00565	0.100
E-Coat Sanding Booth	0.096	0.096	1	0.000864	0.00605	0.00096	0.007872	7,000	60	947	0.00097	0.100
Main Color Sanding Booth	0.576	0.096	6	0.005184	0.03629	0.00576	0.04232	7,000	60	1,519	0.00363	0.100

(Table 1), rather than the Process Weight Rate equations in paragraph (3)(A)1.

Emission Point	Cars/hour	MHDR (gal/car)	Density (#/gal)	Solids	TE	Capture*	Control	MHDR PM10 Emissions (after control)	Grains/Lb	Min/Hr	Flow (Cubic Ft/Min)	Concentration Grains/Cubic Ft	Concentration Limit in Table 1 (Grains/Cubic Ft)
Underbody Deadener	60	0.47	10.00	64.10%	40%	5%	30%	3.80	7,000	60	50,000	0.00886	0.053
Spot Repair Booth Paint	2	0.10	10.4	48.90%	40%	99%	30%	0.43	7,000	60	185,360	0.00027	0.034
Low Bake Repair Booth Assembly	8	0.10	10.4	48.90%	40%	99%	30%	1.72	7,000	60	21,670	0.00924	0.062

*The Underbody Deadener Booth uses ninety-five percent recycled air, which is one-hundred percent controlled, therefore, only five percent of emissions could be vented.

The emission rate is less than the allowable rate in Table 1, taking into account the control provided by the dry filtration system and vacuum systems. (Vacuum systems are used in sanding booths only). Based upon the above, all of the emission units subject to 6.400 meet the specified allowable concentration at normal levels of production.

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 (1) 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 (1) 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 that was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Drafted by Jennifer Phillips, Air Emission Specialist
St. Louis County Air Pollution Control Program

Reviewed by:

Jason Dickneite
Environmental Engineer