



## DEPARTMENT OF NATURAL RESOURCES

## MISSOURI AIR CONSERVATION COMMISSION

## PERMIT TO CONSTRUCT

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

Permit Number: **052007-001** Project Number: 2006-03-080

Parent Company: Construction Trailer Specialists, Inc.

Parent Company Address: 2535 Rose Parkway, Sikeston, MO 63801

Installation Name: Construction Trailer Specialists, Inc.

Installation Address: 2535 Rose Parkway, Sikeston, MO 63801

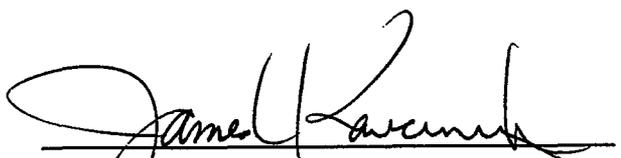
Location Information: Scott County, S8, T26N, R13E

Application for Authority to Construct was made for:  
Removal of the annual installation-wide 40 ton volatile organic compound (VOC) limit established in Permit No. 012000-010. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

- 
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAY 3 2007

EFFECTIVE DATE

  
\_\_\_\_\_  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: Project Number: 2006-03-080

Parent Company: Construction Trailer Specialists, Inc.

Parent Company Address: 2535 Rose Parkway, Sikeston, MO 63801

Installation Name: Construction Trailer Specialists, Inc.

Installation Address: 2535 Rose Parkway, Sikeston, MO 63801

Location Information: Scott County, S8, T26N, R13E

Application for Authority to Construct was made for:  
Removal of the annual installation-wide 40 ton volatile organic compound (VOC) limit established in Permit No. 012000-010. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

- 
- Standard Conditions (on reverse) are applicable to this permit.
  - Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

---

EFFECTIVE DATE

---

DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

Page No.	3
Permit No.	
Project No.	2006-03-080

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Construction Trailer Specialists, Inc.  
Scott County, S8, T26N, R13E

1. **Superseding Condition**  
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 012000-010) from the Air Pollution Control Program.
2. **Maximum Volatile Organic Content (VOC) Content**  
Construction Trailer Specialists, Inc shall not use any new paint, gun wash, and/or thinner in the paint booth (EP3) that has a higher VOC content than those listed in the Application for Authority.
3. **Solvent Cloths**  
Construction Trailer Specialists, Inc. shall keep the solvents and cleaning solutions in sealed containers whenever the materials are not in use.  
Construction Trailer Specialists, Inc. shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with this equipment.
4. **Control Device**  
The fabric filter in the paint booth (EP-3) must be in use at all times when the paint booth is in operation. The filter shall be operated and maintained in accordance with the manufacturer's specifications.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (6) REVIEW

Project Number: 2006-03-080  
Installation ID Number: 201-0110  
Permit Number:

Construction Trailer Specialists, Inc.  
2535 Rose Parkway  
Sikeston, MO 63801

Complete: October 11, 2006  
Reviewed: November 29, 2006

Parent Company:  
Construction Trailer Specialists, Inc.  
2535 Rose Parkway  
Sikeston, MO 63801

Scott County, S8, T26N, R13E

REVIEW SUMMARY

- Construction Trailer Specialists, Inc. has applied for authority to remove the annual installation-wide of 40 ton per rolling 12-month period as established in Permit No. 012000-010.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are ethyl benzene, xylene, toluene, methyl isobutyl ketone (MIBK), HDI isocyanate, methanol, diethylene glycol monomethyl ether, and diethylene glycol monobutyl ether.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart M, *National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products*, applies to the proposed equipment.
- A fabric filter is being used to control the particulate matter less than 10 micron in diameter (PM<sub>10</sub>) emissions from the paint booth (EP-3) in this permit.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs are above de minimis levels but below major source levels, and potential emissions of HAPs are above major source levels.
- This installation is located in Scott County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation’s VOC emissions. In addition, ambient air quality modeling was not performed on HAPS since a MACT applies.
- Emissions testing is not required for the source unless otherwise directed by MACT, Subpart Mmmm.
- A Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Construction Trailer Specialists Incorporated (“Construction Trailer Specialists”) located in Sikeston manufactures semi-trailers. The trailers consists of hopper trailers, bottom dump trailers, and van trailers that weigh between 11,000 lbs. and 15,000 Lbs. (5.5 tons – 7.5 tons). Customers utilize the manufactured trailers in various applications including but not limited to grain transporting (hopper bottom grain trailers) and waste handling (bottom dump).

The following permit has been issued to Construction Trailer Specialists from the Air Pollution Control Program.

Table 1: Previously Issued Construction Permits

Permit Number	Description
012000-010	Installation of a semi-trailer manufacturing facility.

In Permit No. 012000-010, Construction Trailer Specialists took a 40-ton VOC annual limit for the entire installation and therefore was not required to submit an Operating Permit. With the removal of the limit, the installation will be minor for criteria pollutants and major for HAPs.

### PROJECT DESCRIPTION

Construction Trailer Specialists Incorporated has applied for authority to remove their 40-ton VOC annual limit. No new equipment will be constructed or installed. Mainly due to changes in paints used at this installation and method of emission calculations, the potential emissions for the entire facility were reevaluated with this permit.

VOCs, HAPs, and PM<sub>10</sub> will be emitted as a result of the semi-trailer manufacturing activities that will be conducted at this site. Metal, mainly steel, will be fabricated into trailers utilizing cutting, assembling and welding of metal parts. Trailers will be washed utilizing a 100% biodegradable soap and water. The washed trailers will be sand blasted and then painted in a paint booth.

With this equipment, the facility will be capable of fabricating a maximum of five trailers in an 8-hour shift. The welding operation (EP-1) will generate small amounts of particulate matter and HAPs, specifically chromium, nickel and manganese. Two different electrodes are used in the welding area: ERNiCrMO and ER70S. Based on maximum historical usage, the maximum amount of weldment for each electrode-type is 16 and 114 pounds per hour, respectively. The abrasive blasting operation (EP-2) has a maximum blasting rate of 22 pounds per hour which is also based on maximum historical usage. The maximum hourly design rate for the paint booth (EP-3) is based on a maximum of five (5) trailers being able to be painted in a 10-hour period at this facility. As provided by the applicant, the facility utilizes a maximum of 4.5 gallons of primer, 0.5 gallon of thinner, 2 gallons of fun wash, and 12.2 gallons of paint per trailer. Painted trailers will be dried either by forced heat or by air-drying. With forced heat, a two (2) MMBTU/hr burner that utilizes natural gas will be used. The only control device at the installation consists of a fabric filter located in the paint booth for controlling PM<sub>10</sub> emissions.

Please note that potential emissions are based on the maximum production capacity of 5 trailers in an 8-hour shift that was provided by the applicant. This installation could require a new construction permit if a modification to your operations occurs that may cause an increase in maximum production.

This installation is considered major for HAPs. The MACT, Subpart M will apply to the equipment associated with this project. Therefore, this project is not subject to the requirements of Missouri Rule 10 CSR 10-6.060, Section (9), *Hazardous Air Pollutant Permits* even though the potential to emit for several individual HAPs and the combined HAPs exceed the major source levels of 10.0/25.0 tons per year, respectively.

## EMISSIONS/CONTROLS EVALUATION

VOC and HAP emissions are the main pollutants of concern for this review.

The emission factors used in the analysis for welding (EP-1) and abrasive blasting (EP-2) were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, 12.19 *Electric Arc Welding* (1/95) and 13.2.6 *Abrasive Blasting* (9/97), respectively.

The emissions determined for the spray booth (EP-3) were estimated using information obtained from the Material Safety Data Sheets and painting requirements for each semi-trailer as provided by the applicant. A mass balance approach was used and 100% of the VOC and HAP content of the paints, gun wash, and thinner are assumed to be emitted into the atmosphere. PM<sub>10</sub> emissions for the spray booth were evaluated based on the solids content of the paint and transfer efficiency from the spray gun (50%). If

not specifically stated, the solids content of the material was estimated by taking the density of the paint and subtracting the VOC content and assuming that 50% of remainder to be PM<sub>10</sub>. PM<sub>10</sub> emissions are controlled through the use of a high efficiency filter having a minimum control efficiency of 95%.

The emission factors used for the dryer (EP-4) were obtained from the EPA document AP-42, Section 1.4, *Natural Gas Combustion (2/98)*.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit Number 012000-010; however, the potential emissions of the installation were recalculated and represent the potential of all equipment at the installation, assuming continuous operation (8760 hours per year). Existing actual emissions were taken from the installation's 2005 Emission Inventory Questionnaire (EIQ).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Installation	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	3.4	0.08	3.9	N/A
SO <sub>x</sub>	40.0	< 0.01	N/A	< 0.01	N/A
NO <sub>x</sub>	40.0	0.8	N/A	0.8	N/A
VOC	40.0	56	35.77	198.9	N/A
CO	100.0	0.7	N/A	0.7	N/A
HAPs	10.0/25.0	8.83	N/A	66.6	N/A

N/A = Not Applicable

### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs are above de minimis levels but below major source levels, and potential emissions of HAPs are above major source levels.

### APPLICABLE REQUIREMENTS

Construction Trailer Specialists, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

## GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

## SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products*, 40 CFR Part 63, Subpart M

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

---

Susan Heckenkamp  
Environmental Engineer

---

Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 11, 2006, received October 12, 2006, designating Construction Trailer Specialists, Inc. as the owner and operator of the installation.
- Material Safety Data Sheets as provided by the applicant.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Regional Office Site Survey, received April 17, 2006.

Mr. Wesley Graviett  
Purchasing Agent  
Construction Trailer Specialists, Inc.  
2535 Rose Parkway  
Sikeston, MO 63801

RE: New Source Review Permit - Project Number: 2006-03-080

Dear Mr. Graviett:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your revised operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Susan Heckenkamp at (573) 751-4817, or you may write to me at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:shl

Enclosures

c: Southeast Regional Office  
PAMS File 2006-03-080

Permit Number: