



## INTERMEDIATE STATE PERMIT TO OPERATE

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

**Intermediate Operating Permit Number:** OP2008-047  
**Expiration Date:** OCT 28 2013  
**Installation ID:** 019-0066  
**Project Number:** 2007-03-028

**Installation Name and Address**

Dana Light Axle Products, LLC  
2400 Lemone Industrial Blvd.  
Columbia, MO 65201  
Boone County

**Parent Company's Name and Address**

Dana Holding Corporation  
4500 Dorr Street  
Toledo, OH 43615

**Installation Description:**

Dana Light Axle Products, LLC assembles automobile axles for passenger vehicles and pickup trucks. After assembly, the plant applies black paint to some axles to inhibit corrosion. The installation has three basic operations that are sources of emissions: PM, VOC, and HAP emissions from coating operations; PM and HAP emissions from welding operations; and combustion emissions from natural gas combustion. The installation has accepted voluntary, federally enforceable emission limits of less than 100 tons of Volatile Organic Compounds (VOC) per year, ten tons of any individual Hazardous Air Pollutant (HAP) per year and twenty-five tons of combined HAP per year to qualify for an Intermediate State Operating Permit.

OCT 29 2008

Effective Date

  
\_\_\_\_\_  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Dana Light Axle Products, LLC assembles automobile axles for passenger vehicles and pickup trucks. After assembly, the plant applies black paint to some axles to inhibit corrosion. The installation has three basic operations that are sources of emissions: PM, VOC, and HAP emissions from coating operations; PM and HAP emissions from welding operations; and combustion emissions from natural gas combustion. The installation has accepted voluntary, federally enforceable emission limits of less than 100 tons of Volatile Organic Compounds (VOC) per year, ten tons of any individual Hazardous Air Pollutant (HAP) per year and twenty-five tons of combined HAP per year to qualify for an Intermediate State Operating Permit.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2007	0.15	--	0.58	6.43	0.49	--	--
2006	0.04	--	0.47	4.60	0.40	--	--
2005	0.06	--	0.73	3.32	0.62	--	--
2004	0.06	--	0.74	3.88	0.62	--	--
2003	0.05	--	0.66	2.83	0.47	--	--

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	
EU0010	Paint Booth #2	EP-05
EU0020	Paint Booth #3	EP-08
EU0030	Paint Booth #1	EP-18
EU0040	Paint Booth #4	EP-19
EU0050	Model 80 Line Paint Spray Booth	NA
EU0060	Welders	NA

### **EMISSION UNITS WITHOUT LIMITATIONS**

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

#### Description of Emission Source

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Part Cleaning, using spray bottle, fugitive	EP-10
Space Heaters, natural gas-fired	EP-11
RTV Sealant Application, fugitive	EP-12
Manual Adhesive Spray, fugitive	EP-14
Graphite Lubrication, fugitive	EP-15
Tube Press Sealant Application, fugitive	EP-16
Paint Gun Solvent Cleaning, fugitive	EP-17
Industrial Washer #1, natural gas-fired, 2.9 MMBtu/hr	EP-20
Industrial Dry Booth #1, natural gas-fired, 0.5 MMBtu/hr	EP-21
Three (3) Industrial Water Heaters, natural gas-fired, <1.0 MMBtu/hr	EP-22, EP-23, EP-24
Two (2) Industrial Boilers, natural gas-fired, <1.0 MMBtu/hr	EP-25, EP-26
Two (2) Industrial Air Make-up Units, natural gas-fired, 2.8 MMBtu/hr	EP-27, EP-28
Industrial Washer #2, natural gas-fired, 2.0 MMBtu/hr	EP-29
Industrial Dry Booth #2, natural gas-fired, 1.0 MMBtu/hr	EP-30

### **DOCUMENTS INCORPORATED BY REFERENCE**

This permit incorporates the following documents by reference:

- 1) Air Pollution Control Program Construction Permit 0396-003, issued February 27, 1996
- 2) Air Pollution Control Program Construction Permit 0497-006, issued March 28, 1997
- 3) Air Pollution Control Program Construction Permit 052007-002, issued May 4, 2007

## II. Plant Wide Emission Limitations

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

### PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit 052007-002, Issued May 4, 2007

**NOTE:** The permittee has accepted a voluntary, federally enforceable emission limit of less than 100 tons of Volatile Organic Compounds (VOC) in any twelve-month rolling average period to qualify for an Intermediate State Operating Permit. Therefore, the limit of 250 tons of VOC in any twelve-month rolling average period that is established in Construction Permit 052007-002 is not incorporated into the operating permit.

#### Emission Limitations:

- 1) Dana Light Axle Products, LLC shall emit into the atmosphere less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any twelve-month rolling average period. [Voluntary Limit]
- 2) Dana Light Axle Products, LLC shall emit less than ten tons of any individual Hazardous Air Pollutants (HAPs) and twenty-five tons of combined HAPs from this installation in any consecutive twelve month period. [Construction Permit 052007-002, Special Condition 3.A]

#### Monitoring/Recordkeeping:

- 1) Dana Light Axle Products, LLC shall maintain the monthly and the sum of the most recent consecutive twelve-month records of the VOC emissions from the entire installation. Dana Light Axle Products, LLC shall use Attachment "A", Monthly VOC Compliance Tracking Records or an Air Pollution Control Program approved equivalent form to demonstrate compliance with VOC limit. These records shall be maintained on-site for five years and shall be made available to Missouri Department of Natural Resources' personnel upon request. [Construction Permit 052007-002, Special Condition 2.B]
- 2) Attachment B, Attachment C, and Attachment D or equivalent forms approved by the Air Pollution Control Program, shall be used to demonstrate compliance with Special Condition 3.A. The records must include each individual HAP identified on a Material Safety Data Sheets (MSDS) for the HAP containing products in use in the entire installation. The total of the individual HAPs must add up to the total combined HAPs. Dana Light Axle Products, LLC shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used. [Construction Permit 052007-002, Special Condition 3.B]
- 3) When considering using a new HAP containing paint or painting or coating supply item, Dana Light Axle Products, LLC must calculate the potential emissions for each individual Hazardous Air Pollutant (HAP) in the alternative HAP material (paint). If the potential HAP emissions for the

alternative paint is equal to or greater than the ten tons per year for each individual HAP or twenty-five tons per year for total HAPs, or if the calculated potential amount of emissions is equal to or greater than the Screen Modeling Action Levels (SMAL) found in Attachment E for any chemical used, then Dana Light Axle Products, LLC must seek approval from the Air Pollution Control Program before use of the alternative paint. Attachment E may require periodic updating to current values. Current HAPs SMAL values can be obtained from the Air Pollution Control Program's State Toxicologist. [Construction Permit 052007-002, Special Condition 3.D]

**Reporting:**

- 1) Dana Light Axle Products, LLC shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, no later than ten days after the end of the month during which Monthly VOC Tracking Records indicate that Dana Light Axle Products, LLC exceeded the limitation of emitting less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any twelve-month rolling average period.  
[Construction Permit 052007-002, Special Condition 2.C]
- 2) Dana Light Axle Products, LLC shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, no later than ten days after the end of the month during which the records indicate that the source exceeds the limitation of emitting less than ten tons individually or twenty-five tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive twelve-month rolling average period.  
[Construction Permit 052007-002, Special Condition 3.C]

### III. Emission Unit Specific Emission Limitations

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

<b>EU0010 THROUGH EU0040 – PAINT BOOTHS #2, #3, #1 AND #4</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>2005 EIQ Reference #</b>
EU0010	Paint Booth #2: axle painting operation; MHDR 3.14 gal/hr; equipped with polyester pocket filter	NA	EP-05
EU0020	Paint Booth #3: axle painting operation; MHDR 3.14 gal/hr; equipped with polyester pocket filter	NA	EP-08
EU0030	Paint Booth #1: axle painting operation; MHDR 2.1 gal/hr; equipped with polyester pocket filter	NA	EP-18
EU0040	Paint Booth #4: axle painting operation; MHDR 2.1 gal/hr; equipped with polyester pocket filter	NA	EP-19

**PERMIT CONDITION EU0010-001**  
 10 CSR 10-6.060 Construction Permits Required  
 Construction Permit 0396-003, Issued February 27, 1996

**Operational Specifications:**

- 1) All paints, cleaning solvents, and any other material that emits volatile organic compounds shall be kept in sealed containers during transport and storage.  
 [Construction Permit 0396-003, Special Condition 5]
- 2) The polyester pocket filters shall be operated and maintained within the manufacturer's specifications during all hours the booth is in operation.  
 [Construction Permit 0396-003, Special Condition 6]

**PERMIT CONDITION EU0020-001**  
 10 CSR 10-6.060 Construction Permits Required  
 Construction Permit 0497-006, Issued March 28, 1997

**Operational Specifications:**

- 1) Dana Corporation shall not discharge hazardous air pollutants (HAPs) from Paint Booth #3 (EU0020). [Construction Permit 0497-006, Special Condition 3]
- 2) All paints, cleaning solvents, and any other material that emits VOCs shall be kept in sealed containers during transport and storage. [Construction Permit 0497-006, Special Condition 6]
- 3) The polyester pocket filters shall be operated and maintained within the manufacturer's specifications during all hours the booth is in operation.  
 [Construction Permit 0497-006, Special Condition 7]

**Reporting:**

- 1) If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, the director may require Dana Corporation to submit a corrective action plan within ten days adequate to timely and significantly mitigate the odors. Dana Corporation shall implement any such plan immediately upon its approval by the director. Failure to either submit or implement such a plan shall be a violation of the permit. [Construction Permit 0497-006, Special Condition 8]

**PERMIT CONDITION (EU0010 through EU0040)-002**

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

**Emission Limitations:**

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than twenty percent.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to sixty percent.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on these emission units (EU0010 through EU0040) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. 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 would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results (see Attachment F-1 or F-2), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment G)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment H)

- 4) Attachments F-1, F-2, G and H contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained for five years.
- 6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record-keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**PERMIT CONDITION (EU0010 through EU0040)-003**

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

**Emission Limitations:**

- 1) Particulate matter shall not be emitted from individual paint booths EU0010 through EU0040 in excess of 0.5 lb/hr.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring:**

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

**Recordkeeping:**

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule.
- 2) The permittee shall maintain records of the inspections of the filter including when they occur. Attachment G contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 3) All records shall be maintained for five years.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

**Reporting:**

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

<b>EU0050 AND EU0060 – MODEL 80 LINE PAINT SPRAY BOOTH AND WELDERS</b>			
Emission Unit	Description	Manufacturer/ Model #	2005 EIQ Reference #
EU0050	Model 80 Line Paint Spray Booth: axle painting operation; air-assisted spray gun; MHDR 2.7 gal/hr; installed 2007	NA	NA
EU0060	Welders: two (2) puddle welders; MHDR 7.06 lb/hr	NA	NA

**PERMIT CONDITION (EU0050 and EU0060)-001**  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit 052007-002, Issued May 4, 2007

**Operational Specifications:**

Dana Light Axle Products, LLC shall control emissions from the welding with cartridge filters and Model 80 Paint Spray Booth with paint arresting pads as specified in the Construction Permit 52007-002 application. The cartridge filters and pads shall be operated and maintained in accordance with the manufacturer's specifications. The cartridge filters and pads shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for the cartridge filters and pads shall be kept on hand at all times. The filters and pads shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Construction Permit 052007-002, Special Condition 4.A]

**Monitoring/Recordkeeping:**

- 1) Dana Light Axle Products, LLC shall monitor and record the operating pressure drop across the cartridge drum filters and pad area at least once every twenty-four hours when the equipment is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Construction Permit 052007-002, Special Condition 4.B]
- 2) Dana Light Axle Products, LLC shall maintain an operating and maintenance log for the cartridge filters and pad area which shall include the following: [Construction Permit 052007-002, Special Condition 4.C]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

**Reporting:**

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**PERMIT CONDITION EU0050-002**

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

**Emission Limitations:**

- 1) No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than twenty percent.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any sixty minutes air contaminants with an opacity up to sixty percent.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on this emission unit (EU0050) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. 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 would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results (see Attachment F-1 or F-2), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment G)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment H)
- 4) Attachments F-1, F-2, G and H contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.
- 5) All records shall be maintained for five years.
- 6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**PERMIT CONDITION EU0050-003**

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

**Emission Limitation:**

- 1) Particulate matter shall not be emitted from EU0050 in excess of 0.5 lb/hr.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring:**

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

**Recordkeeping:**

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule.
- 2) The permittee shall maintain records of the inspections of the filter including when they occur. Attachment G contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 3) All records shall be maintained for five years.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

**Reporting:**

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

## IV. Core Permit Requirements

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

### **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 fifteen days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo, to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

**10 CSR 10-6.060 Construction Permits Required**

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

**10 CSR 10-6.065 Operating Permits**

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

**10 CSR 10-6.110 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 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 to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

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

#### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;

- b) Yard waste, with the following exceptions:
- i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
  - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
  - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
    - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
    - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
    - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
    - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and
  - iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Dana Light Axle Products, LLC may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Dana Light Axle Products, LLC fails to comply with the provisions or any condition of the open burning permit.
- a) In a non-attainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.

- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

**10 CSR 10-3.090 Restriction of Emission of Odors**

**This requirement is not federally enforceable.**

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

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

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

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.

- c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 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*

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

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

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

## V. General Permit Requirements

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

### 10 CSR 10-6.065, §(5)(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 Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, Missouri, 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than thirty days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

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

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

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

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

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

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

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

None.

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

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

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

- 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 non-compliance 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 non-compliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

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

The application utilized in the preparation of this permit was signed by Tony James, Plant Manager. On August 14, 2008, the Air Pollution Control Program was informed that Kevin Farmer, Regional Environmental Manager is now the responsible official. If this person terminates employment, or is re-assigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 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 Missouri Department of Natural Resources (MDNR) 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) MDNR or EPA determines that the permit must be re-opened and revised to assure compliance with applicable requirements.

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

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

## VI. Attachments

Attachments follow.









**ATTACHMENT E**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Acetaldehyde	75-07-0	9	Acetic Aldehyde, Aldehyde, Ethanal, Ethyl Aldehyde
Acetamide	60-35-5	1	Acetic Acid Amide, Ethanamide
Acetonitrile	75-05-8	4	Methyl Cyanide, Ethanenitrile, Cyanomethane
Acetophenone	98-86-2	1	Acetylbenzene, Methyl Phenyl Ketone, Hypnone
Acetylaminofluorine, [2-]	53-96-3	0.005	N-2-Fluorenyl Acetaminde, N-Fluoreen-2-yl Acetamide, 2-Acetamideofluorene
Acrolein	107-02-8	0.04	Acrylaldehyde, Acrylic Aldehyde, Allyl Aldehyde, Propenal
Acrylamide	79-06-1	0.02	Propenamamide, Acrylic Amide, Acrylamide Monomer, Ethylenecarboxamide
Acrylic Acid	79-10-7	0.6	Propenoic Acid, Ethylene Carboxylic Acid, Vinylformic Acid
Acrylonitrile	107-13-1	0.3	Vinyl Cyanide, Cyanoethylene, Propenenitrile
Allyl Chloride	107-05-1	1	1-Chloro-2-Propene, 3-Chloropropylene, Chloroallylene, Alpha-Propylene
Aminobiphenyl,[4-]	92-67-1	1	Biphenylene, P-Phenylaniline, Xenylamine, 4-Aminodiphenyl, 4-Biphenylamine
Aniline	62-53-3	1	Aminobenzene, Phenylamine, Aniline Oil, Aminophen, Arylamine
Anisidine, [Ortho-]	90-04-0	1	O-Methoxyaniline
Antimony Compounds (except those specifically listed)		5	Antimony (Pentachloride, Tribromide, Trichloride, Trifluoride)
Antimony Pentafluoride	7783-70-2	0.1	
Antimony Potassium Tartrate	28300-74-5	1	
Antimony Trioxide	1309-64-4	1	
Antimony Trisulfide	1345-04-6	0.1	
Arsenic and Inorganic Arsenic Compounds		0.005	Arsenic (Diethyl, Disulfide, Pentoxide, Trichloride, Trioxide, Trisulfide), Arsinine, Arsenous Oxide
Benz(a)Anthracene	56-55-3	0.01	
Benz(c)acridine	225-51-4	0.01	
Benzene	71-43-2	2	Benzol, Phenyl Hydride, Coal Naphtha, Phene, Benzole, Cyclohexatriene
Benzidine	92-87-5	0.0003	4,4'-Biphenyldiamine, P-Diaminodiphenyl, 4,4'-Diaminobiphenyl, Benzidine Base
A. Benzo(a)pyrene	50-32-8	0.01	
B. Benzo(b)fluoranthene	205-992	0.01	
C. Benzotrichloride	98-07-7	0.006	Benzoic Trichloride, Phenylchloroform, Trichloromethylbenzene
Benzyl Chloride	100-44-7	0.1	Alpha-Chlorotoluene, Tollyl Chloride

**ATTACHMENT E (Continued)**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Beryllium Compounds (except Beryllium Salts)		0.008	Beryllium (Acetate, Carbonate, Chloride, Fluoride, Hydroxide, Nitrate, Oxide)
Beryllium Salts		0.00002	
Bis(Chloroethyl) Ether	111-44-4	0.06	Dichloroethyl ether, Dichloroether, Dichloroethyl Oxide, BCEE
Bis(Chloromethyl) Ether	542-88-1	0.0003	BCME, Sym-Dichloromethyl ether, Dichloromethyl Ether, Oxybis(Chloromethane)
Butadiene, [1,3-]	106-99-0	0.07	Biethylene, Biviny, Butadiene Monomer, Divinyl Erythrene, Vinylethylene
Butylene Oxide, [1,2-]	106-88-7	1	1,2-Epoxybutane, 1-Butene Oxide, 1,2-Butene Oxide, Butylene Oxide, Ethylethylene
Cadmium Compounds		0.01	Cadmium (Dust, Fume, Acetate, Chlorate, Chloride, Fluoride, Oxide, Sulfate, Sulfide)
Carbon Disulfide	75-15-0	1	Carbon Bisulfide, Dithiocarbonic Anhydride
Carbon Tetrachloride	56-23-5	1	Tetrachloromethane, Perchloromethane
Carbonyl Sulfide	463-58-1	5	Carbon Oxide Sulfide, Carbonoxysulfide
Catechol	120-80-9	5	Pyrocatechol, O-Dihydroxybenzene
Chloramben	133-90-4	1	3-Amino-2,5-Dichlorobenzoic Acid, Amben, Amiben*, Vegiben* (*Trademark)
Chlordane	57-74-9	0.01	ENT9932, Octachlor
Chlorine	7782-50-5	0.1	Bertholite
Chloroacetic Acid	79-11-8	0.1	Monochloroacetic Acid, Chloroethanoic Acid
Chloroacetophenone, [2-]	532-27-4	0.06	Phenacyl Chloride, Chloromethyl Phenyl Ketone, Tear Gas, Mace
Chlorobenzilate	510-15-6	0.4	Ethyl-4,4'-Dichlorobenzilate, Ethyl-4,4'-Dichlorophenyl Glycollate
Chloroform	67-66-3	0.9	Trichloromethane
Chloromethyl Methyl Ether	107-30-2	0.1	CMME, Methyl Chloromethyl Ether, Chloromethoxymethane, Monochloromethyl Ether
Chloroprene	126-99-8	1	2-Chloro-1,3-Butadiene, Chlorobutadiene, Neoprene Rubber Compound
Chromic Chloride	10025-73-7	0.1	
Chromium Compounds (except Hexavalent)		5	Chromium, Chromium(II) Compounds, Chromium (III) Compounds
Chromium Compounds, Hexavalent		0.002	Chromium (VI)
Chrysene	218-01-9	0.01	
Cobalt Carbonyl	12010-68-1	0.1	

**ATTACHMENT E (Continued)**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Cobalt Metal (and compounds, except those specifically listed)		0.1	Cobalt (Bromide, Chloride, Diacetate, Formate, Nitrate, Oxide, Sulfamate)
Coke Oven Emissions	8007-45-2	0.03	Coal Tar, Coal Tar Pitch, Coal Tar Distillate
Cresol, [Meta-]	108-39-4	1	3-Cresol, M-Cresylic Acid, 1-Hydroxy-3-Methylbenzene, M-Hydroxytoluene
Cresol, [Ortho-]	95-48-7	1	2-Cresol, O-Cresylic Acid, 1-Hydroxy-2-Methylbenzene, 2-Methylphenol
Cresol, [Para-]	106-44-5	1	4-Cresol, P-Cresylic Acid, 1-Hydroxy-4-Methylbenzene, 4-Hydroxytoluene
Cresols/Cresylic Acid (isomers and mixture)	1319-77-3	1	
Cresol, [Para-]	106-44-5	1	4-Cresol, P-Cresylic Acid, 1-Hydroxy-4-Methylbenzene, 4-Hydroxytoluene
Cresols/ Cresylic Acid(isomers and mixture)	1319-77-3	1	
Cresols/ Cresylic Acid(isomers and mixture)	1319-77-3	1	
Cyanide Compounds (except those specifically listed)	20-09-7	5	Cyanide (Barium, Chlorine, Free, Hydrogen, Potassium, Silver, Sodium, Zinc)
DDE (p,p'-Dichlorodiphenyl Dichloroethylene)	72-55-9	0.01	
Di(2-Ethylhexyl) Phthalate, (DEHP)	117-81-7	5	Bis(2-ethylhexyl)Phthalate, Di(2-Ethylhexyl)Phthalate, DOP, Di-Sec-OctylPhthalate
Diaminotoluene, [2,4-]	95-80-7	0.02	2,4-Toluene Diamine, 3-Amino-Para-Toluidine, 5-Amino-Ortho-Toluidine
Diazomethane	334-88-3	1	Azimethylene, Diazirine
Dibenz(a,h)anthracene	53-70-3		
Dibenzofuran	132-64-9	5	Diphenylene Oxide
Dibenzopyrene, [1,2:7,8]	189-55-9		
Dibromo-3-Chloropropane, [1,2-]	96-12-8	0.01	DBCP
Dibromomethane, [1,2-]	106-93-4	0.1	Ethylene Dibromide, Ethylene Bromide, Sym-Dibromoethane
Dichlorobenzene, [1,4-]	106-46-7	3	1,4-Dichloro-P-DCB, 1-4-DCB, PDB, PDCB
Dichlorobenzidene, [3,3-]	91-94-1	0.2	4,4'-Diamino-3,3'-Dichlorobiphenyl, 3,3'-Dichlorobiphenyl-4,4'-Diamine, DCB
Dichloroethane, [1,1-]	75-34-3	1	Ethylidene Dichloride, 1,1-Ethylidene Dichloride, Asymmetrical Dichlorethane
Dichloroethane, [1,2-]	107-06-2	0.8	Ethylene Dichloride, Glycol Dichloride, Ethylene Chloride

**ATTACHMENT E (Continued)**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Dichloroethylene, [1,1-]	75-35-4	0.4	Vinylidene Chloride, DCE, VDC
Dichloropropane, [1,2-]	78-87-5	1	Propylene Dichloride
Dichloropropene [1,3-]	542-75-6	1	1,3-Dichloropropylene, Alpha-Chlorallyl Chloride
Dichlorvos	62-73-7	0.2	DDVP, 2,2-Dichlorovinyl dimethyl phosphate
Diethanolamine	11-42-2	5	Bis(2-Hydroxyethyl)Amine, 2,2'-Dihydroxydiethylamine, Di(2Hydroxyethyl)Amine
Diethyl Sulfate	64-67-5	1	Diethyl Ester Sulfuric Acid, Ethyl Sulfate
Dimethoxybenzidine, [3,3-]	119-90-4	0.1	Fast Blue B Base, Dianisidine, O-Dianisidine
Dimethylbenz(a)anthracene, [7,12]	57-97-6	0.01	
Dimethyl Benzidine, [3,3-]	119-93-7	0.008	O-Tolidine, Bianisidine, 4,4'-Diamino-3,3'-Dimethylbiphenyl, Diaminoditoyl
Dimethyl Carbamoyl Chloride	79-44-7	0.02	DMCC, Chloroformic Acid Dimethyl Amide, Dimethyl Carbamyl Chloride
Dimethyl Formamide	68-12-2	1	DMF, Formyldimethylamine
Dimethyl Hydrazine, [1,1-]	57-14-7	0.008	Unsymmetrical Dimethylhydrazine, UDMH, Dimazine
Dimethyl Sulfate	77-78-1	0.1	Sulfuric Acid Dimethyl Ester, Methyl Sulfate
Dimethylaminoazobenzene, [4-]	60-11-7	1	N,N-Dimethyl-P-Phenylazo-Aniline, Benzeneazo Dimethylaniline
Dimethylaniline, [N,N-]	121-69-7	1	N,N-Diethyl Aniline, N,N-Dimethylphenylamine, DMA
Dinitro-O-Cresol, [4,6-] and salts	534-52-1	0.1	DNOC, 3,5-Dinitro-O-Cresol, 2-Methyl-4,6-Dinitrophenol
Dinitrophenol, [2,4-]	51-28-5	1	DNP
Dinitrotoluene, [2,4-]	121-14-2	0.02	Dinitrotoluol, DNT, 1-Methyl-2,4-Dinitrobenzene
Dioxane, [1,4-]	123-91-1	6	1,4-Diethyleneoxide, Diethylene Ether, P-Dioxane
Diphenylhydrazine, [1,2-]	122-66-7	0.09	Hydrazobenzene, N,N'-Diphenylhydrazine, N,N'-Bianiline, 1,1'-Hydrodibenzene
Diphenylmethane Diisocyanate, [4,4-]	101-68-8	0.1	Methylene Bis(Phenylisocyanate), Methylene Diphenyl Diisocyanate, MDI
Epichlorohydrin	106-89-8	2	1-Chloro-2,3-Epoxypropane, EPI, Chloropropylene Oxide, Chloromethyloxirane
Ethyl Acrylate	140-88-5	1	Ethyl Propenoate, Acrylic Acid Ethyl Ester
Ethylene Imine (Aziridine)	151-56-4	0.003	Azacyclopropane, Dimethyleneimine, Ethyleneimine, Vinylamine, Azirane

**ATTACHMENT E (Continued)**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Ethylene Oxide	75-21-8	0.1	1,2-Epoxyethane, Oxirane, Dimethylene Oxide, Anprolene
Ethylene Thiourea	96-45-7	0.6	2-Imidazolidinethione, ETU
Fluomine	62207-76-5	0.1	
Formaldehyde	50-00-0	2	Oxymethylene, Formic Aldehyde, Methanal, Methylene Oxide, Oxomethane
Glycol Ethers (except those specifically listed)		5	
Heptachlor	76-44-8	0.02	1,4,5,6,7,8,8A-Heptachloro-3A,4,7,7A-Tetrahydro-4,7-Methanoindiene
Hexachlorobenzene	118-74-1	0.01	Perchlorobenzene, HCB, Pentachlorophenyl Benzene, Phenyl Perchloryl
Hexachlorobutadiene	87-68-3	0.9	Perchlorobutadiene, 1,3-Hexachlorobutadiene, HCB
Hexachlorocyclopentadiene	77-47-4	0.1	HCCPD, HEX
Hexachloroethane	67-72-1	5	Perchloroethane, Carbon Hexachloride, HCE, 1,1,1,2,2,2-Hexachloroethane
Hexamethylene Diisocyanate, 1,6	822-06-0	0.02	1,6-Diisocyanatohexane, 1,6-Hexanediol Diisocyanate
Hexamethylphosphoramide	680-31-9	0.01	Hexamethylphosphoric Triamide, HEMPA, Hexametapol, Hexamethylphosphoramide
Hydrazine	302-01-2	0.004	Methylhydrazine, Diamide, Diamine, Hydrazine Base
Hydrogen Fluoride	7664-39-3	0.1	Hydrofluoric Acid Gas, Fluorhydric Acid Gas, Anhydrous Hydrofluoric Acid
Hydrogen Selenide	7783-07-5	0.1	
Hydroquinone	123-31-9	1	Quinol, Hydroquinol, P-Diphenol, 1,4-Benzenediol, Hydrochinone, Arctuvine
Indeno(1,2,3-cd) Pyrene	193-39-5	0.01	
Lead and Compounds (except those specifically listed)	20-11-1	0.01	Lead (Acetate, Arsenate, Chloride, Fluoride, Iodide, Nitrate, Sulfate, Sulfide)
Lindane [Gamma-Hexachlorocyclohexane]	58-89-9	0.01	Benzene Hexachloride – Gamma Isomer
Maleic Anhydride	108-31-6	1	2,5-Furanediene, Cis-Butenedioic Anhydride, Toxic Anhydride
Manganese and Compounds (except those specifically listed)	20-12-2	0.8	Manganese (Acetate, Chloride, Dioxide, (II)-Oxide, (III)-Oxide, (II)-Sulfate
Mercury Compounds except those specifically listed)	20-13-3	0.01	Mercury Compounds (Methyl-, Ethyl-, Phenyl-)
Mercury Compounds (Inorganic)	20-13-3	0.01	Mercury (Chloride, Cyanide, (I,II)-[Bromide, Iodide, Nitrate, Sulfate], Oxide)

**ATTACHMENT E (Continued)**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Methyl Hydrazine	60-34-4	0.06	Monomethylhydrazine, Hydrozomethane, 1-Methylhydrazine
Methyl Iodide	74-88-4	1	Idomethane
Methyl Isocyanate	624-83-9	0.1	Isocyanatomethane, Isocyanic Acid, Methyl Ester
Methylcyclopentadienyl Manganese	12108-13-3	0.1	
Methylene Bis(2Chloroaniline), [4,4-]	101-14-4	0.2	Curene, MOCA, 4,4'-Diamino-3,3'-Dichlorodiphenylmethane
Methylenedianiline, [4,4-]	101-77-9	1	4,4'-Diaminodipheylmethane, DDM, MDA, Bis(4-Aminophenyl)Methane, DAPM
Nickel Carbonyl	13463-39-3	0.1	
Nickel Compounds (except those specifically listed)		1	Nickel (Acetate, Ammonium Sulfate, Chloride, Hydroxide, Nitrate, Oxide, Sulfate)
Nickel Refinery Dust		0.08	
Nickel Subsulfide	12035-72-2	0.04	
Nitrobenzene	98-95-3	1	Nitrobenzoi, Oil of Mirbane, Oil of Bitter Almonds
Nitrobiphenyl, [4-]	92-93-3	1	4-Nitrodiphenyl, P-Nitrobiphenyl, P-Nitrophenyl, PNB
Nitrophenol, [4-]	100-02-7	5	4-Hydroxynitrobenzene, Para-Nitrophenol
Nitropropane, [2-]	79-46-9	1	Dimethylnitromethane, Sec-Nitropropane, Isonitropropane, Nitroisopropane
Nitroso-N-Methylurea, [N-]	684-93-5	0.0002	N-Methyl-N-Nitrosoarea, N-Nitroso-N-Methylcarbamide
Nitrosodimethylamine, [N-]	62-75-9	0.001	Dimethylnitrosamine, DMN, DMNA
Nitrosomorpholine, [N-]	59-89-2	1	4-Nitrosomorpholine
Parathion	56-38-2	0.1	DNTP, Monothiophosphate, Diethyl-P-Nitrophenyl
PCB (Polychlorinated Biphenyls)	1336-36-3	0.009	Aroclors
Pentachloronitrobenzene	82-68-8	0.3	Quintobenzene, PCNB, Quiniozene
Pentachlorophenol	87-86-5	0.7	PCP, Penchlorol, Pentachlorophenate, 2,3,4,5,6-Pentachlorophenol
Phenol	108-95-2	0.1	Carbolic Acid, Phenic Acid, Phenylic Acid, Phenyl Hydrate, Hydroxybenzene
Phenyl Mercuric Acetate	62-38-4	0.01	
Phosgene	75-44-5	0.1	Carbonyl Chloride, Carbon Oxychloride, Carbonic Acid Dichloride

**ATTACHMENT E (Continued)**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Phosphine	7803-51-2	5	Hydrogen Phosphide, Phosphoretted Hydrogen, Phosphorus Trihydride
Phosphorous (Yellow or White)	7723-14-0	0.1	
Phthalic Anhydride	85-44-9	5	Phthalic Acid Anhydride, Benzene-O-Dicarboxylic Acid Anhydride, Phthalandione
Polycyclic Organic Matter (except those specifically listed)	TP15	0.01	POM, PAH, Polyaromatic Hydrocarbons,
Potassium Cyanide	151508	0.1	
Propane Sultone, [1,3-]	1120-71-4	0.03	1,2-Oxathiolane-2,2-Dioxide, 3-Hydroxy-1-Propanesulphonic Acid Sultone
Propiolactone, [Beta-]	57-57-8	0.1	2-Oxeatanone, Propiolactone, BPL, 3-Hydroxy-B-Lactone-Propanoic Acid
Propionaldehyde	123-38-6	5	Propanal, Propyl Aldehyde, Propionic Aldehyde
Propylene Oxide	75-56-9	5	1,2-Epoxypropane, Methylene Oxide, Methyl Oxirane, Propene Oxide
Propyleneimine, [1,2-]	75-55-8	0.003	2-Methyl Aziridine, 2-Methylazacyclopropane, Methyleneimine
Quinoline	91-22-5	0.006	1-Azanaphthalene, 1-Benzazine, Benzo(B)Pyridine, Chinoleine, Leucoline
Quinone	016-51-4	5	Benzoquinone, Chinone, P-Benzoquinone, 1,4-Benzoquinone
Selenium and Compounds (except those specifically listed)	7782-49-2	0.1	Selenium (Metal, Dioxide, Disulfide, Hexafluoride, Monosulfide)
Sodium Cyanide	143-33-9	0.1	
Sodium Selenate	13410-01-0	0.1	
Sodium Selenite	101020-18-8	0.1	
Styrene	100-42-5	1	Cinnamene, Cinnamol, Phenethylene, Phenylethylene, Vinylbenzene
Styrene Oxide	96-09-3	1	Epoxyethylbenzene, Phenylethylene Oxide, Phenyl Oxirane, Epoxystyrene
Tetrachlorodibenzo-P-Dioxin	1746-01-6	6.00E-07	
Tetrachloroethane, [1,1,2,2-]	79-34-5	0.3	Sym-Tetachloroethane, Acetylene Tetrachloride, Ethane Tetrachloride
Tetraethyl Lead	78-00-2	0.01	
Tetramethyl Lead	75-74-1	0.01	
Titanium Tetrachloride	7550-45-0	0.1	Titanium Chloride
Toluene Diisocyanate, [2,4]	584-84-9	0.1	TDI, Tolylene Diisocyante, Diisocyanatoluene

**ATTACHMENT E (Continued)**  
**Screen Modeling Action Levels for Individual HAPs**

Chemical	CAS#	Screen Modeling Action Levels (tons/year)	Synonyms
Toluidine, [Ortho-]	95-53-4	4	Ortho-Aminotoluene, Ortho-Methylaniline, 1-Methyl-1,2-Aminobenzene
Toxaphene	8001-35-2	0.01	Chlorinated Camphene, Camphechlor, Polychlorcamphene
Trichloroethane, [1,1,2-]	79-00-5	1	Vinyl Trichloride, Beta-Trichloroethane
Trichlorophenol, [2,4,5-]	95-95-4	1	2,4,5-TCP
Trichlorophenol, [2,4,6-]	88-06-2	6	2,4,6-TCP
Trifluralin	1582-09-8	9	2,6-Dinitro-N-N-Dipropyl-4-(Trifluoromethyl)Benzeneamine
Trimethylpentane, [2,2,4-]	540-84-1	5	Isobutyltrimethylethane, Isoctane
Urethane [Ethyl Carbamate]	51-79-6	0.8	Ethyl Urethane, O-Ethylurethane, Leucothane, NSC 746, Urethan
Vinyl Acetate	108-05-4	1	Acetic Acid Vinyl Ester, Vinyl Acetate Monomer, Ethenyl Ethanoate
Vinyl Bromide	593-60-2	0.6	Bromoethylene, Bromoethene
Vinyl Chloride	75-01-4	0.2	Chloroethylene, Chloroethene, Monochloroethylene



**ATTACHMENT F-2  
 Method 22 (Outdoor) Observation Log**

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 22 (Outdoor) Observation Log		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
<p>Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.</p>          		
Observation Clock Time	Observation Period Duration (minute: second)	Accumulative Emission Time (minute: second)
Begin Observation		
End Observation		



**ATTACHMENT H  
Method 9 Opacity Emissions Observations**

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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

## STATEMENT OF BASIS

### Voluntary Limitations

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

### Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received March 8, 2007;
- 2) 2007 Emissions Inventory Questionnaire, received May 15, 2008;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 4) E-mail from Kevin Farmer, Regional Environmental Manager, Dana Corporation, dated July 11, 2007.

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

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

None.

### Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 10 CSR 10-3.060, *Maximum Allowable Emissions of PM from Fuel Burning Equipment Used for Indirect Heating*
  - a) The permittee marked this rule as applicable to the natural gas-fired combustion units in the permit application. However, this rule was not applied in the operating permit because, as shown in the calculations below, it is highly unlikely that the minimal PM emissions from the natural gas-fired combustion units would ever exceed the particulate matter emission limitation. The PM emission limit is based on the total heat input rate, in MMBtu/hr, of all indirect heating units at the installation (Q). The indirect heating sources at the facility and their respective heat input rates are as follows:

EU ID #	EU Description	Heat Input (MMBtu/hr)
EP-11	Space Heaters	0.087
EP-20	Industrial Washer #1	2.9
EP-21	Industrial Dry Booth #1	0.5
EP-22	Industrial Water Heaters,	0.04
EP-23	Industrial Water Heaters,	0.04
EP-24	Industrial Water Heaters	0.075
EP-25	Industrial Boiler	0.167
EP-26	Industrial Boiler	0.167
EP-27	Industrial Air Make-up Units	2.8
EP-28	Industrial Air Make-up Units	2.8
EP-29	Industrial Washer #2	2.0
EP-30	Industrial Dry Booth #2	1.0
Installation's Total Heat Input (Q)		12.6

Allowable Emission Rate (E) for New Sources

$$E = 1.31Q^{-0.338}$$

Where

E = maximum allowable PM emission rate in lb/MMBtu of heat input, rounded to two decimal places

Q = the installation's total heat input in millions of Btu/hr

$$E = 1.31(12.6)^{-0.338}$$

$$E = 0.56 \text{ lb/MMBtu}$$

Potential Emission Rate (PTE)

PM emission factor for natural gas = 7.6 lb/10<sup>6</sup> scf [US EPA document AP-42 Table 1.4-2]

Heating value of natural gas = 1020 MMBtu/10<sup>6</sup> scf [US EPA document AP-42 Table 1.4-2]

PTE PM Emissions = (7.6 lb/10<sup>6</sup> scf)/(1020 MMBtu/10<sup>6</sup> scf) = 0.0075 lb/MMBtu

The uncontrolled potential to emit rate of 0.0075 lb/MMBtu is well below the allowable emission rate of 0.56 lb/MMBtu

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

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

3) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

a) The permittee marked this rule as applicable to the natural gas-fired combustion units in the permit application. However, these units are assumed to be always in compliance because, as shown in the above calculations, natural gas combustion produces only a small amount of particulate matter.

4) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

a) This rule was marked as applicable in the permit application. However, this rule was amended on May 30, 2004, and according to the amended rule, §(1)(A)2, combustion equipment that use exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquid petroleum gas as defined by American Society for Testing Materials (ASTM) are exempt. Therefore, this rule was not applied to the installation's natural gas-fired emission units:

### Construction Permit Revisions

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

- 1) Air Pollution Control Program Construction Permit 0992-013 authorized the construction of a truck axle paint booth (EP-02).
  - a) Special Condition 1 of this construction permit was superseded by Special Condition 1 of Construction Permit 052007-002. In addition, Special Conditions 2 through 5 of Construction Permit 0992-013 are not included in the operating permit because they are recordkeeping and reporting requirements associated with Special Condition 1.
  - b) According to the Permit Application, the truck axle paint booth EP-02 has been removed from service. Therefore, EP-02 is not included in the operating permit.
- 2) Air Pollution Control Program Construction Permit 0396-003 authorized the addition of a second coating line, which included Paint Booth #2 (EU0010) and sealant application.
  - a) Special Conditions 1, 2, 3 and 4 of this construction permit were modified by Construction Permit 0497-006. [As noted below, the special conditions of Construction Permit 0497-006 subsequently were superseded by Construction Permit 052007-002.]
  - b) This construction permit listed 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminant*, as an applicable requirement. This rule was rescinded on May 30, 2000, and replaced with 10 CSR 10-6.220. 10 CSR 10-6.220 is included in the operating permit.
- 3) Air Pollution Control Program Construction Permit 0996-004 authorized the addition of a new coating line (EP-06) and sealant application (EP-07).
  - a) The new coating line (EP-06) and sealant application (EP-07) are not included in the operating permit because according to an e-mail from Kevin Farmer dated July 11, 2007, these units were removed from the installation.
- 4) Air Pollution Control Program Construction Permit 0497-006 authorized the installation of Paint Booth #3 (EU0020) and a Sealant Application Area (EP-09).
  - a) The Sealant Application Area (EP-09) is not included in the operating permit because according to an e-mail from Kevin Farmer dated July 11, 2007, this unit has been removed from the installation.
  - b) Special Conditions 1 and 2 of this construction permit were superseded by Construction Permit 052007-002. In addition, Special Conditions 4 and 5 of Construction Permit 0497-006 are not included in the operating permit because they are recordkeeping and reporting requirements associated with the Special Conditions 1 and 2.
  - c) Special Condition 3, 6, 7, and 8 of this construction permit are included in Permit Condition EU0020-001, excluding references to Sealant Application Area (EP-9).
  - d) This construction permit listed 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminant*, as an applicable requirement. This rule was rescinded on May 30, 2000, and replaced with 10 CSR 10-6.220. 10 CSR 10-6.220 is included in the operating permit.
- 5) Air Pollution Control Program Construction Permit 0699-028 authorized hand spray application of isopropanol for surface cleaning of automobile parts.
  - a) This construction permit listed 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminant*, as an applicable requirement. This rule was rescinded on May 30, 2000, and replaced with 10 CSR 10-6.220. 10 CSR 10-6.220 is not included because it is unlikely that the emissions from the hand spray application of isopropanol could exceed the twenty percent opacity limitation.

- 6) Air Pollution Control Program Construction Permit 052007-002 authorized the installation of Model 80 Line Paint Spray Booth (EU0050) and Welders (EU0060).
- a) Special Condition 2.A. established an emission limit of 250 tons of VOC in any twelve-month rolling average period. The permittee has accepted a voluntary, federally enforceable emission limit of less than 100 tons of VOC in any twelve-month rolling average period in order to qualify for an intermediate state operating permit. Therefore, the limit of 250 tons of VOC limit that is established in Special Condition 2.A is not incorporated into the operating permit.

**New Source Performance Standards (NSPS) Applicability**

None.

**Maximum Available Control Technology (MACT) Applicability**

None.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None.

**Other Regulatory Determinations**

- 1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*
  - a) This rule does not apply to Manual Adhesive Spray (EP-14) because according to §(1)(B)7, fugitive emissions are exempt.
  - b) This rule applies to the spray booths (EU0010 through EU0050). The calculations below verify compliance with both the PM Emission Rate and the PM Concentration provided that the required control devices are in operation and working properly:

Emission Rate Limit

$$\text{Emission Rate Limit (lb/hr) } E = 4.1(P)^{0.67}$$

Where: P = process weight rate

However, according to 10 CSR 10-6.400(1)(b)11, emission sources that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of PM are exempt. Therefore, the PM emission limit has been listed as 0.5 lb/hr when the above equation calculates an emission rate of less than 0.5 lb/hr.

PM Emission Rate

$$\text{Emission Rate (lb/hr)} = (P)(\text{EmissionFactor}) \left[ 1 - \frac{\text{TransferEff}}{100} \right] \left[ 1 - \frac{\text{OverallControlEff}}{100} \right]$$

Where: Emission Factor (lb/ton) = (% solids/100) x (2000 lb/ton)

EU #	MHDR (gal/hr)	Density (lb/gal)	Process Weight (ton/hr)	% Solids	Emission Factor (lb/ton)	Transfer Eff. (%)	Overall Control Device Efficiency (%)	Controlled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0010	3.14	11.30	0.02	47	940	65	98	0.04	0.5
EU0020	3.14	11.30	0.02	47	940	65	98	0.04	0.5
EU0030	2.10	11.30	0.01	47	940	65	98	0.03	0.5
EU0040	2.10	11.30	0.01	47	940	65	98	0.03	0.5
EU0050	2.70	10.93	0.01	67	1340	65	94	0.15	0.5

PM Concentration

$$\text{Emission rate (gr/dscf)} = \text{Emission Rate (lb/hr)} \times (7000 \text{ grains/lb}) / \text{Stack flow rate (SCFM)/60(min/hr)}$$

Flow rates converted from actual to standard conditions using the ideal gas law.

EU #	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp (°F)	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
EU0010	0.04	77	17,000	16,715	0.0003	0.3
EU0020	0.04	77	17,000	16,715	0.0003	0.3
EU0030	0.03	77	17,000	16,715	0.0002	0.3
EU0040	0.03	77	17,000	16,715	0.0002	0.3
EU0050	0.15	77	18,350	18,042	0.001	0.3

- c) This rule does not apply to Welders (EU0060) because according to §(1)(B)(11), emission units that at a maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The following table demonstrates that EU0060 has the potential to emit less than 0.5 lb/hr. In addition, 10 CSR 10-6.220 was not applied to EU0060 since it is highly unlikely that equipment that has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter would ever exceed the twenty percent opacity threshold required by this rule.

EU #	MHDR (lb/hr)	Emission Factor (lb/1000 lb)	Uncontrolled Emission Rate (lb/hr)
EU0060	7.06	15.1	0.11

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

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

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

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

Prepared by:



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