

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

AUG - 8 2007

CERTIFIED MAIL: 70051820000233103438  
RETURN RECEIPT REQUESTED

Mr. Dean Orem, Vice President - Human Resources  
EFCO Corporation  
1000 County Road  
Monett, MO 65708

Re: EFCO Corporation, 009-0003  
Permit Number: **OP2007-039**

Dear Mr. Orem:

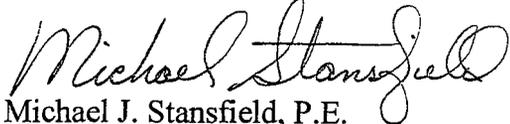
Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations, cited in this document, is necessary for continued compliance. It is very important you read and understand the requirements contained in your permit.

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

If you have any questions or need additional information regarding this permit, please contact Jill Wade at (573) 751-4817 or write the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your time and consideration.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS: jwk

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII  
Southwest Regional Office  
PAMS File: 2004-09-083



## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2007-039  
**Expiration Date:** AUG - 7 2012  
**Installation ID:** 009-0003  
**Project Number:** 2004-09-083

**Installation Name and Address**

EFCO Corporation  
Bridle W and County Road  
Monett, MO 65708  
Barry County

**Parent Company's Name and Address**

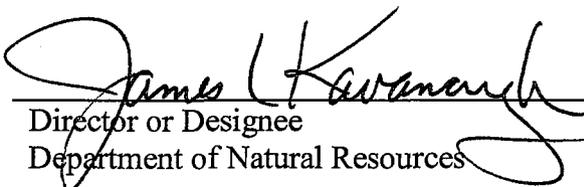
EFCO Corporation  
P.O. Box 609  
Monett, MO 65708

**Installation Description:**

This installation is an architectural window manufacturing installation, located in Barry County. Aluminum is extruded, cut, shaped, welded, finished and painted, and glass is installed. Products are then shipped to consumers. The installation is located in an attainment area and is a major source for VOC and HAPs.

AUG - 8 2007

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

This installation is an architectural window manufacturing installation, located in Barry County. Aluminum is extruded, cut, shaped, welded, finished and painted, and glass is installed. Products are then shipped to consumers. The installation is located in an attainment area and is a major source for VOC and HAPs.

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)
2005	0.6	0.03	4.8	149.6	3.8	-	0.9
2004	0.6	0.03	4.8	222.5	3.9	-	0.9
2003	0.6	0.03	5.1	207.2	4.0	-	-
2002	0.6	0.03	5.1	224.0	4.0	-	-
2001	0.6	-	4.5	140.6	3.7	-	-

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	Aluminum Billet Preheat Oven (5.6 mmBTU/hr)
EU0020	Aluminum Extrusion Aging Oven (5.0 mmBTU/hr)
EU0030	Burner Tubes for Alkaline Cleaner (4.7 mmBTU/hr)
EU0040	Burner Tubes for Chromate Phosphate (4.7 mmBTU/hr)
EU0050	Post Conversion Coating – Drying Oven (4.1 mmBTU/hr)
EU0060	Paint Curing Oven (4.5 mmBTU/hr)
EU0070	Paint Hangar Burn-Off Oven (0.6 mmBTU/hr)
EU0080	Small Parts Cure Oven (0.6 mmBTU/hr)
EU0090	Aluminum Billet Preheat Oven (5.6 mmBTU/hr)
EU0100	Aluminum Extrusion Aging Oven (5.0 mmBTU/hr)
EU0110	Alkaline Spray Cleaner
EU0120	Painting Operations
EU0130	Painting Operations
EU0140	Painting Operations
EU0150	Painting Operations
EU0160	Painting Operations
EU0170	Painting Operations
EU0180	Painting Operations
EU0190	Painting Operations
EU0200	Painting Operations
EU0210	Paint Mix Area
EU0220	Painting Operations
EU0230	Solvent Recovery Unit

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EU0240	Vinyling and Sealing Operation
EU0250	Window Cleaning
EU0260	Final Seal
EU0270	Alum-A-Lub Lubricant Usage
EU0280	Paint Lab Booth
EU0290	Painting Operations
EU0300	Painting Operations
EU0310	Painting Operations
EU0320	Adhesive Spray Booth
EU0330	Anodizing Department Boiler
EU0340	Anodizing Department Boiler
EU0360	General Area Ventilation Exhaust
EU0370	Glass Plane Edge Sander
EU0380	Die Cleaning
EU0390	Caustic Aluminum Etching Bath

**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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EU0240	Vinyling and Sealing Operation
EU0250	Window Cleaning
EU0260	Final Seal
EU0270	Alum-A-Lub Lubricant Usage

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) Construction Permit #1197-023

## II. Plant Wide Emission Limitations

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

### PERMIT CONDITION PW001

10 CSR 10-6.075

**Maximum Achievable Control Technology Regulations**

40 CFR Part 63, Subpart M M M M

**National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products**

#### Emission Limitation:

At all times, you must limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period except as specified in §63.3890(c), determined according to the requirements in §63.3941, §63.3951, or §63.3961. [§63.3890(b)] and [§63.3900(a)(1)]

#### Compliance Demonstration:

##### Compliance Dates

- 1) *Existing affected sources* must be in compliance with the final rule no later than three years after January 2, 2004. New and reconstructed sources must be in compliance upon initial startup of the affected source or by January 2, 2004, whichever is later. [§63.3883(b) and (c)]

##### Initial Compliance Demonstration

- 1) You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890. [§63.3940]
- 2) You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not required to meet the operating limits or work practice standards in §§63.3892 and 63.3893, respectively. [§63.3951]

- 3) You must meet all the requirements of §63.3951. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. [§63.3951]
- 4) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of §63.3951 must be less than or equal to the applicable emission limit for each subcategory in §63.3890. You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section. [§63.3951(h)]

#### **Continuous Compliance Demonstration**

- 1) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951 (a) through (g), must be less than or equal to the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3951 (a) through (g) on a monthly basis using data from the previous 12 months of operation. [§63.3952(a)]
- 2) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6). [§63.3952(b)]
- 3) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g). [§63.3952(c)]
- 4) You must maintain records as specified in §§63.3930 and 63.3931. [§63.3952(d)]

#### **Compliance Test Methods and Calculations:**

- 1) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in §63.3941 (a)(i) through (5). [§63.3951(a) and §63.3941(a)]
  - a) *Method 311 (40 CFR part 63, Appendix A).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in §63.3941 (a)(i)(i) and (ii) when performing a Method 311 test. [§63.3941 (a)(i)]

- i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791). [§63.3941 (a)(1)(i)]
  - ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763). [§63.3941 (a)(1)(n)]
- 2) *Method 24 (Appendix A to 40 CFR part 60)*. For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in Appendix A to Subpart PPPP of Part 63, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in Appendix A to Subpart PPPP of Part 63, as a substitute for the mass fraction of organic HAP. [§63.3941 (a)(2)]
- 3) *Alternative method*. You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941 (a)(3)]
- 4) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in §63.3941 (a)(1) through (3), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to §63.3941 (a)(1) through (3), then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941 (a)(4)]
- 5) *Solvent blends*. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 of Subpart MMMM. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4 to Subpart MMMM, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941 (a)(5)]
- 6) *Determine the volume fraction of coating solids for each coating*. You must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in §63.3941 (b)(1) through (4). If test results obtained according to §63.3941 (b)(1) do not agree with the information obtained under §63.3941 (b)(3) or (4), the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data

are correct. [§63.3951(b) and §63.3941 (b)]

- a) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).* You may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings," (incorporated by reference, see § 63.14), or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see § 63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. [§63.3941 (b)(1)]
- b) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in § 63.7(f) to submit an alternative test method for approval. [§63.3941 (b)(2)]
- c) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.3941 (b)(3)]
- d) *Calculation of volume fraction of coating solids.* You may determine the volume fraction of coating solids using Equation 1 of §63.3941: [§63.3941 (b)(4)]

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where:

$V_s$  = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

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

$D_{\text{avg}}$  = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see § 63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

- 7) *Determine the density of each coating.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965-02, "Standard Test Methods for Specific Gravity of Coating Powders" (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475-98 or ASTM Method D5965-02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine

material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1 A, IB, 1C, and 2 of §63.3951. [§63.3951 (c)]

- 8) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, IB, and 1C of §63.3951. [§63.3951 (d)]
- 9) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of §63.3951. [§63.3951(e)]

$$He = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

He = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of §63.3951

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation IB of §63.3951.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of §63.3951.

R<sub>w</sub> = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to §63.3951(e)(4). (You may assign a value of zero to R<sub>w</sub> if you do not wish to use this allowance.)

- a) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of §63.3951:

$$A = \sum_{i=1}^m (\text{Vol}_{c,i}) (D_{c,i}) (W_{c,i}) \quad (\text{Eq. 1A})$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

Vol<sub>c,i</sub> = Total volume of coating, i, used during the month, liters.

D<sub>c,i</sub> = Density of coating, i, kg coating per liter coating.

W<sub>c,i</sub> = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart P of Part 63.

m = Number of different coatings used during the month. [§63.3951(e)(1)]

- b) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation IB of §63.3951:

$$B = \sum_{j=1}^n (\text{Vol}_{t,j}) (D_{t,j}) (W_{t,j}) \quad (\text{Eq. IB})$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

Vol<sub>t,j</sub> = Total volume of thinner and/or other additive, j, used during the month, liters.

D<sub>t,j</sub> = Density of thinner and/or other additive, j, kg per liter.

- $W_{tj}$  = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of part 63.
- n = Number of different thinners and/or other additives used during the month. [§63.3951 (e)(2)]

- c) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of §63.3951:

$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad (\text{Eq. 1C})$$

Where:

- C = Total mass of organic HAP in the cleaning materials used during the month, kg.
- $Vol_{s,k}$  = Total volume of cleaning material, k, used during the month, liters.
- $D_{s,k}$  = Density of cleaning material, k, kg per liter.
- $W_{s,k}$  = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.
- p = Number of different cleaning materials used during the month. [§63.3951 (e)(3)]

- d) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of §63.3951, then you must determine the mass according to §63.3951 (e)(4)(i) through (iv). [§63.3951(e)(4)]
- i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of §63.3951 and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater. [§63.3951(e)(4)(i)]
  - ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month. [§63.3951(e)(4)(ii)]
  - iii) Determine the total mass of organic HAP contained in the waste materials specified in §63.3951(e)(4)(ii). [§63.3951(e)(4)(iii)]
  - iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them. [§63.3951 (e)(4)(iv)]

- 10) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of §63.3951:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad (\text{Eq.2})$$

Where:

$V_{st}$  = Total volume of coating solids used during the month, liters.

$Vol_{ci}$  = Total volume of coating, i, used during the month, liters.

$V_{s,i}$  = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

m = Number of coatings used during the month. [§63.3951 (f)]

- 11) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of §63.3951:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \text{ (Eq-3)}$$

Where:

$H_{yr}$  = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

$H_e$  = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of §63.3951.

$V_{st}$  = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of §63.3951.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12). [§63.3951(g)]

### **Monitoring:**

You must always operate and maintain your affected source, according to the provisions in §63.6(e)(1)(i). A startup-shutdown and malfunction plan is not required. [§63.3900(b)]

### **Recordkeeping:**

- 1) A copy of each notification and report that you submitted to comply with Subpart M MMM, and the documentation supporting each notification and report shall be kept. [§63.3930(a)]
- 2) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating shall be kept. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)J]

- 3) For each compliance period, the records specified in §63.3930 (c)(1) and (c)(3) shall be kept. [§63.3930(c)]
  - a) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used. [§63.3930(c)(1)]
  - b) A record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Sec. 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of Sec. 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951. [§63.3930(c)(3)]
- 4) You shall keep a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period shall be kept. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
- 5) You shall keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
- 6) You shall keep a record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
- 7) You shall keep a record of the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period. [§63.3930(g)]
- 8) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in §63.3930(h)(1) through (3). [§63.3930(h)]
  - a) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which Subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.3930(h)(1)]
  - b) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951. [§63.3930(h)(2)]
  - c) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.3930(h)(3)]
- 9) You must keep records of the date, time, and duration of each deviation. [§63.3930(j)]
- 10) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
- 11) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]

- 12) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(l). You may keep the records off-site for the remaining 3 years. [§63.3931 (c)]

### **Reporting:**

#### **General Requirements**

You must submit the notifications in §§ 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in §63.3910 (b) and (c). [§63.3910(a)]

#### **Initial Notification Requirements**

You must submit the initial notification no later than 1 year after January 2, 2004. [§63.3910(b)]

#### **Notification of Compliance Status**

- 1) You must submit the notification of compliance status required by § 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §§63.3940 that applies to your affected source. The notification of compliance status must contain the information specified in §63.3910 (c)(l) through (11) and in §63.9(h). [§63.3910(c)]
- a) Company name and address. [§63.3910(c)(l)]
  - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3910(c)(2)]
  - c) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source. [§63.3910(c)(3)]
  - d) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation in the affected source during the initial compliance period. [§63.3910(c)(4)]
  - e) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period. [§63.3910(c)(5)]
  - f) If you had a deviation, include the information in §63.3910 (c)(6)(i) and (ii). [§63.3910(c)(6)] (i). A description and statement of the cause of the deviation. [§63.3910(c)(6)(i)]
    - i) If you failed to meet the applicable emission limit in §63.3890, include all the calculations you used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports. [§63.3910(c)OXii)]
  - g) For each of the data items listed in §63.3910 (c)(7)(i) through (iv) that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). You do not need to submit copies of any test reports. [§63.3910(c)(7)]
    - i. Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material. [§63.3910(c)(7)(i)]

- ii. Volume fraction of coating solids for one coating. [§63.3910(c)(7)(ii)]
- iii. Density for one coating, one thinner and/or other additive, and one leaning material, except that if you use the compliant material option, only the example coating density is required. [§63.3910(c)(7)(iii)]
- iv. The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.3951. [§63.3910(c)(7)(iv)]
- h) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) you used, as specified in §63.3910 (c)(8)(ii). [§63.3910(c)(8)]
- i) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.3951. [§63.3910(c)(8)(ii)]

### Semiannual Compliance Reports

- 1) You must submit semiannual compliance reports for each affected source according to the requirements of §63.3920 (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in §63.3920 (a)(2). [§63.3920(a)]
  - a) **Dates.** Unless the Administrator has approved or agreed to a different schedule for submission of reports under § 63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in §63.3920 (a)(1)(i) through (iv). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(1)]
    - i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3950 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period. [§63.3920(a)(1)(i)]
    - ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [§63.3920(a)(1)(ii)]
    - iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [§63.3920(a)(1)(iii)]
    - iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in §63.3920 (a)(1)(iii). [§63.3920(a)(1)(iv)]
  - b) **Inclusion with Title V Report.** Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in Subpart MMMM in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission

limitation in Subpart M MMM, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]

- c) **General Requirements.** The semiannual compliance report must contain the information specified in §63.3920 (a)(3)(i) through (vii), and the information specified in §63.3920 (a)(4) through (7) and (c)(1) that is applicable to your affected source. [§63.3920(a)(3)]
- i) Company name and address. [§63.3920(a)(3)(i)]
  - ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3920(a)(3)(ii)]
  - iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
  - iv) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used. [§63.3920(a)(3)(iv)]
  - v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. [§63.3920(a)(3)(v)]
  - vi) If you used the predominant activity alternative (§63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report. [§63.3920(a)(3)(vi)]
  - vii) If you used the facility-specific emission limit alternative (§63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period. [§63.3920(a)(3)(vii)]
- d) **No Deviations.** If there were no deviations from the emission limitations in §63.3890 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- e) **Deviations:** Emission rate without add-on controls option. If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in §63.3920 (a)(6)(i) through (iii). [§63.3920(a)(6)]
- i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890. [§63.3920(a)(6)(i)]
  - ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste

materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).  
[§63.3920(a)(6)(ii)]

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

<b>Permit Condition PW002</b>
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10 CSR 10-6.060

<b>Construction Permits Required</b> <b>APCP Construction Permit #1197-023</b>
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**Emission Limitation:**

- 1) VOCs: EFCO Corporation shall not emit more than 249 tons of volatile organic compounds (VOC) in any consecutive 12-month period from this installation.
- 2) HAPs:
  - a) EFCO Corporation shall not emit more than 188 tons of Toluene in any consecutive 12-month period from this installation.
  - b) EFCO Corporation shall not emit more than 55 tons of Ethyl Benzene in any consecutive 12-month period from this installation.
  - c) EFCO Corporation shall not emit more than 70 tons of Methyl Ethyl Ketone in any consecutive 12-month period from this installation.
  - d) EFCO Corporation shall not emit more than 68 tons of Dimethyl Phthalate in any consecutive 12-month period from this installation.
  - e) EFCO Corporation shall not emit more than 76 tons of Diethylene Glycol n-butyl Ether in any consecutive 12-month period from this installation.
  - f) EFCO Corporation shall not emit more than 15 tons of Glycol Ethers in any consecutive 12-month period from this installation.
  - g) EFCO Corporation shall not emit more than 208 tons of Xylene in any consecutive 12-month period from this installation.
  - h) EFCO Corporation shall not emit more than 1 ton of Formaldehyde in any consecutive 12-month period from this installation.
  - i) EFCO Corporation shall not emit more than 1 ton of Chromium in any consecutive 12-month period from this installation.
  - j) EFCO Corporation shall not emit more than 2.5 tons of Hydrogen Flouride in any consecutive 12-month period from this installation.
- 3) Odor Conditions:
  - If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, the Director may require EFCO Corporation to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. EFCO 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.

**Monitoring:**

EFCO Corporation shall maintain an accurate record of production from all emission points and calculate emissions of VOC and HAPs emitted into the atmosphere from all emission sources. EFCO Corporation shall also retain records of the annual usage of paint material containing ethyl acrylate.

**Recordkeeping:**

- 1) EFCO Corporation shall record the monthly and running 12-month totals of VOC emissions from the installation. EFCO Corporation shall record the monthly and running 12-month totals of HAP emissions from the installation.
- 2) EFCO Corporation shall use Attachment A, Attachment B, and Attachment C or equivalent forms for this purpose. Plant wide permitted actual and conditioned potential emissions shall not exceed 250 tons VOC per running 12-month total.
- 3) EFCO Corporation shall retain on-site records of volatile yearly content test results for still bottoms and the Hazardous Waste Manifest of the total amount of VOCs as having been shipped from the operations during the year at this installation. The value of the percent of the waste paint is volatile supporting calculation of volatile organic compound recovered must be available to any Missouri Department of Natural Resources' personnel upon request.
- 4) EFCO Corporation shall maintain on-site for not less than five (5) years all records and shall immediately make such records available to any Missouri Department of Natural Resources' personnel upon request.

**Permit Condition PW003**

10 CSR 10-6.220

**Restriction of Emissions of Visible Air Contaminants**

**Emission Limitation:**

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA 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 (2) 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 D or E), 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 F)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment G)
- 4) Attachments D or E, F and G contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

**Reporting:**

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

### III. Emission Unit Specific Emission Limitations

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

IV. EU0010 through EU0100 – Natural Gas Fired Ovens			
Emission Unit	Description	MMBTU/hr	2003 EIO Reference #
EU0010	Aluminum Billet Preheat Oven	5.6 mmBTU/hr	EP01
EU0020	Aluminum Extrusion Aging Oven	5.0 mmBTU/hr	EP05
EU0030	Burner Tubes for Alkaline Cleaner	4.7 mmBTU/hr	EP07
EU0040	Burner Tubes for Chromate Phosphate	4.7 mmBTU/hr	EP09
EU0050	Post Conversion Coating – Drying Oven	4.1 mmBTU/hr	EP11
EU0060	Paint Curing Oven	4.5 mmBTU/hr	EP25
EU0070	Paint Hanger Burn-Off Oven	0.6 mmBTU/hr	EP28
EU0080	Small Parts Cure Oven	0.6 mmBTU/hr	EP40
EU0090	Aluminum Billet Preheat Oven	5.6 mmBTU/hr	EP50
EU0100	Aluminum Extrusion Aging Oven	5.0 mmBTU/hr	EP54

#### Permit Condition (EU0010 through 0100)-001

10 CSR 10-3.060

#### Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

**Emission Limitation:**

The permittee shall not emit particulate matter in excess of 0.40 pounds per million BTU of heat input.

**Operation Limitation/Equipment Specifications:**

This emission unit shall be limited to burning pipeline grade natural gas.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain on the premises a copy of the Statement of Basis demonstrating compliance with this rule.
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**Permit Condition (EU0010 through EU0100)-002**

**Permit Condition (EU0010 through 0100)-002**  
 10 CSR 10-6.260  
**Restriction of Emission of Sulfur Compounds**

**Emission Limitation:**

- 1) Emissions from any existing or new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

**Operational Limitation/Equipment Specifications:**

The emission unit shall be limited to burning pipeline grade natural gas.

**Monitoring/Recordkeeping:**

Documentation supporting the fuel used is pipeline grade natural gas.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<b>V. EU0110 through EU0320 – Natural Gas Fired Ovens</b>			
Emission Unit	Description	MHDR	2003 EIQ Reference #
EU0110	Alkaline Spray Cleaner	5.6 mmBTU/hr	EP08
EU0120	Painting Operations	5.0 mmBTU/hr	EP12
EU0130	Painting Operations	4.7 mmBTU/hr	EP13
EU0140	Painting Operations	4.7 mmBTU/hr	EP14
EU0150	Painting Operations	4.1 mmBTU/hr	EP15
EU0160	Painting Operations	4.5 mmBTU/hr	EP16
EU0170	Painting Operations	0.6 mmBTU/hr	EP17
EU0180	Painting Operations	0.6 mmBTU/hr	EP18
EU0190	Painting Operations	5.6 mmBTU/hr	EP19
EU0200	Painting Operations	5.0 mmBTU/hr	EP20
EU0210	Paint Mix Area		EP26
EU0220	Painting Operations		EP27
EU0230	Solvent Recovery Unit		EP29
EU0280	Paint Lab Booth		EP60
EU0290	Painting Operations		EP61
EU0300	Painting Operations		EP62
EU0310	Painting Operations		EP63
EU0320	Adhesive Spray Booth		EP64

**Permit Condition (EU0110 through EU0320)-001**

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

**Emission Limitation:**

- 1) Particulate matter shall not be emitted from these emission units in excess of the emission rates. These emission rates were calculated using the following equation:

For process weight rates of 60,000 lb/hr or less:

$$E = 4.10(P)^{0.67}$$

Where:

E = rate of emission in lb/hr

P = process weight rate in tons/hr

Emission Unit	Description	Allowable Emission Rate (lbs/hr)
EU0110	Alkaline Spray Cleaner	0.302573
EU0120	Painting Operations	31.37509
EU0130	Painting Operations	31.37509
EU0140	Painting Operations	31.37509
EU0150	Painting Operations	31.37509
EU0160	Painting Operations	31.37509
EU0170	Painting Operations	31.37509
EU0180	Painting Operations	31.37509
EU0190	Painting Operations	31.37509
EU0200	Painting Operations	31.37509
EU0210	Paint Mix Area	0.302573
EU0220	Painting Operations	31.37509
EU0230	Solvent Recovery Unit	0.302573
EU0280	Paint Lab Booth	0.302573
EU0290	Painting Operations	0.302573
EU0300	Painting Operations	0.302573
EU0310	Painting Operations	0.302573
EU0320	Adhesive Spray Booth	31.37509

- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring:**

- 1) Emission units equipped with fabric filters 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 fabric filters including when they occur.
- 3) These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
- 5) All records shall be maintained for five years.

**Reporting:**

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

<b>VI. EU0330 through EU0340 – Natural Gas Fired Boilers</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>MHDR</b>	<b>2003 EIQ Reference #</b>
EU0330	Anodizing Department Boiler	4.4 mmBTU/hr	EP33
EU0340	Anodizing Department Boiler	4.4 mmBTU/hr	EP34

**Permit Condition (EU0330 through EU0340)-001**

10 CSR 10-6.260

**Restriction of Emission of Sulfur Compounds**

**Emission Limitation:**

*Emission Limitation:*

- 1) No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight (8) pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three (3) hour time period.
- 2) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

**Operational Limitation/Equipment Specifications:**

The emission unit shall be limited to burning pipeline grade natural gas.

**Monitoring/Recordkeeping:**

Documentation supporting the fuel used is pipeline grade natural gas.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<b>VII. EU0360 through EU0390</b>			
Emission Unit	Description	MHDR	2003 EIQ Reference #
EU0360	General Area Ventilation Exhaust		N/A
EU0370	Glass Plane Edge Sander		EP38
EU0380	Die Cleaning		EP06
EU0390	Caustic Aluminum Etching Bath		EP30

**Permit Condition (EU0360 through EU0390)-001**

10 CSR 10-6.400  
 Control of Emission of Particulate Matter From Industrial Processes

**Emission Limitation:**

- 1) Particulate matter shall not be emitted from these emission units in excess of the emission rates. These emission rates were calculated using the following equation:

For process weight rates of 60,000 lb/hr or less:

$$E = 4.10(P)^{0.67}$$

Where:

E = rate of emission in lb/hr

P = process weight rate in tons/hr

Emission Unit	Description	Allowable Emission Rate (lbs/hr)
EU0360	General Area Ventilation Exhaust	6.697092
EU0370	Glass Plane Edge Sander	6.697092
EU0380	Die Cleaning	0.557184
EU0390	Caustic Aluminum Etching Bath	0.557184

- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring:**

- 1) Emission units equipped with fabric 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 fabric filters including when they occur.
- 3) These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
- 5) All records shall be maintained for five years.

**Reporting:**

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV 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) 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 10-6.050 Start-up, Shutdown and Malfunction Conditions**

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

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

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

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months.

[10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

[10 CSR 10-6.065(6)(C)3.B]

#### **10 CSR 10-6.110 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 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

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

#### **10 CSR 10-6.150 Circumvention**

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

#### **10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

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

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

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

#### **10 CSR 10-3.030 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt EFCO Corporation from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

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

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. **This requirement is not federally enforceable.**

**10 CSR 10-6.100 Alternate Emission Limits**

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

- 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 10-6.080 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 recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

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

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

- 
- c) Any other monitoring methods approved by the director.
  - 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
    - a) Monitoring methods outlined in 40 CFR Part 64;
    - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "*Operating Permits*", and incorporated into an operating permit; and
    - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
  - 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
    - a) Applicable monitoring or testing methods, cited in:
      - i) 10 CSR 10-6.030, "*Sampling Methods for Air Pollution Sources*";
      - ii) 10 CSR 10-6.040, "*Reference Methods*";
      - iii) 10 CSR 10-6.070, "*New Source Performance Standards*";
      - iv) 10 CSR 10-6.080, "*Emission Standards for Hazardous Air Pollutants*"; or
    - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

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

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

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

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

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

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

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

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

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

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

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

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

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

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;

- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The application requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously

emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

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

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

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) 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,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

## VI. Attachments

Attachments follow.







**ATTACHMENT D**

This attachment (or an equivalent form) may be used to help meet the recordkeeping requirements of Permit Conditions PW003.

**Method 22 (Outdoor) Observation Log**

Emission Unit

Observer	Date
----------	------

Sky Conditions

Precipitation

Wind Direction	Wind Speed
----------------	------------

Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.

Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		



**ATTACHMENT F**

This attachment (or an equivalent form) may be used to help meet the recordkeeping requirements of Permit Conditions PW003.

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

**VII.**

Hour	Min.	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

### Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received September 24, 2004;
- 2) Operating Permit Number OP2000-029;
- 3) 2003 Emissions Inventory Questionnaire, received; and
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials.

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

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

The installation indicated that EU0240 – Vinyling and Sealing Operation, EU0250 – Window Cleaning, EU0260 – Final Seal, EU0270 – Alum-A-Lub Lubricant Usage were subject to 10 CSR 10-6.400, Control of Emission of Particulate Matter From Industrial Processes. These emission units only emit VOC and not Particulate Matter. These emission units are not subject to 10 CSR 10-6.400 since they do not emit particulate matter. There are no other regulations to apply to these units. Since there are no specific regulations that apply to these units, they have been placed under Emission Units without Limits.

### Construction Permit Revisions

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

Construction Permit 012004-004

The special conditions of this permit state that the installation is subject to 40 CFR Part 63, Subpart M, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products*. The installation included Subpart M in their Operating Permit Application. This subpart has been included in Permit Condition PW001. Since the special conditions of this Construction Permit have been fulfilled (by the OP application and Permit), these conditions have not been included in this Operating Permit.

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

The boilers installed in 1996 did not meet the applicability requirements under NSPS, Subpart Db (The boilers, at 4.4mmBtu/hr, are smaller than the applicability threshold).

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

40 CFR Part 63, Subpart M, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products* applies to the installation. This subpart has been included in Permit Condition PW001.

The chromium anodizing tank at the installation did not meet the applicability requirements under the MACT, Subpart N. The installation uses a dilute chromium solution (10%) in the bath. The chromium emissions from this tank are limited through the construction permit #1197-023 to less than one (1) ton per year. In 1998, the actual chromium emission from the emission unit was .02 tons.

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

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

### **Compliance Assurance Monitoring (CAM) Applicability**

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

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

### **Other Regulatory Determinations**

- 1) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

10 CSR 10-3.060 limits the particulate emissions for new sources (built after 4/3/71) according to the equation,  $E = 1.31(Q)^{-0.338}$  and for existing sources (built prior to 4/3/71) according to the equation,  $E = 0.90(Q)^{-0.174}$  where E is the maximum allowable particulate emission rate in pounds per million BTU of heat input, rounded off to two (2) decimal places; and Q is the

installation heat input in millions of BTU per hour. The emissions limits for each of the sources subject to this regulation are calculated below.

The installation heat input (Q) is:

Emission Unit ID	Emission Unit Description	Heat Input (mmBTU/hr)
EU0010	Aluminum Billet Preheat Oven, Natural Gas Fired	5.6
EU0020	Aluminum Extrusion Aging Oven, Natural Gas Fired	5.0
EU0030	Burner Tubes for Alkaline Cleaner, Natural Gas	4.7
EU0040	Chromate Phosphate Conversion Coat Burner	4.7
EU0050	Post Conversion Coating Drying Oven, Natural Gas	4.1
EU0060	Paint Curing Oven, Natural Gas Fired	4.5
EU0070	Paint Hangar Burn-Off Oven	0.6
EU0080	Heat Mirror Oven	0.6
EU0090	Aluminum Billet Preheat Oven, Natural Gas Fired	5.6
EU0100	Aluminum Extrusion Aging Oven, Natural Gas Fired	5.0
EU0340	Anodizing Department Boiler, Natural Gas Fired	4.4
EU0350	Anodizing Department Boiler, Natural Gas Fired	4.4
EP55	Natural Gas Fired Space Heaters (120 Total)	31.2
<b>Total (Q)</b>		<b>80.4</b>

Based on the total heat input of the installation, the particulate emission limit for indirect heating sources is calculated as:

$$E = E = 1.31(80.4)^{-0.338}$$

$$E = 0.30 \text{ lb/MMBtu}$$

2) 10 CSR 10-6.400, *Control of Emission of Particulate Matter From Industrial Processes*

Emission Unit	Description	MHDR	Emission Factor (lbs/unit)	Allowable Emission Rate (lbs/hr)	Uncontrolled	Capture Efficiency	Control Device Efficiency	Controlled Emissions
EU0110	Alkaline Spray Cleaner	0.0204417	83.6	0.302573	1.70892612	0.5	0.998	0.0017089
EU0120	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0130	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0140	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0150	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0160	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0170	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0180	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0190	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0200	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0210	Paint Mix Area	0.0204417	83.6	0.302573	1.70892612	0.5	0.998	0.0017089
EU0220	Painting Operations	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0230	Solvent Recovery Unit	0.0204417	83.6	0.302573	1.70892612	0.5	0.998	0.0017089
EU0280	Paint Lab Booth	0.0204417	83.6	0.302573	1.70892612	0.5	0.998	0.0017089
EU0290	Painting Operations	0.0204417	83.6	0.302573	1.70892612	0.5	0.998	0.0017089

Emission Unit	Description	MHDR	Emission Factor (lbs/unit)	Allowable Emission Rate (lbs/hr)	Uncontrolled	Capture Efficiency	Control Device Efficiency	Controlled Emissions
EU0300	Painting Operations	0.0204417	83.6	0.302573	1.70892612	0.5	0.998	0.0017089
EU0310	Painting Operations	0.0204417	83.6	0.302573	1.70892612	0.5	0.998	0.0017089
EU0320	Adhesive Spray Booth	20.85	83.6	31.37509	1743.06	0.5	0.998	1.74306
EU0360	General Area Ventilation Exhaust	2.08	0.2	6.697092	0.416	0.5	0.998	0.000416
EU0370	Glass Plane Edge Sander	2.08	0.35	6.697092	0.728	0.5	0.998	0.000728
EU0380	Die Cleaning	0.05085	0.79	0.557184	0.0401715	0.5	0.998	4.017E-05
EU0390	Caustic Aluminum Etching Bath	0.05085	0.79	0.557184	0.0401715	0.5	0.998	4.017E-05

At the maximum hourly design rate, the controlled particulate matter emission is much less than the allowable emission rate. It is highly unlikely that the allowable emission rate will be exceeded with the control device operating properly. Therefore, the monitoring and recordkeeping will include periodic monitoring of the control device.

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

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

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

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

Prepared by:



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Jill S. Wade  
Environmental Engineer