

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2017-092
Expiration Date: DEC 08 2022
Installation ID: 009-0003
Project Number: 2011-04-001

Installation Name and Address

EFCO Corporation
1000 County Road
Monett, MO 65708
Barry County

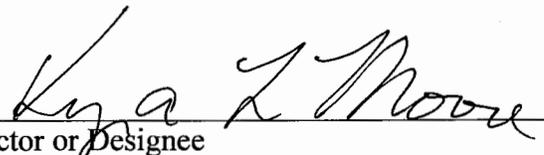
Parent Company's Name and Address

Apogee Enterprises
4400 West 78th Street, Suite 520
Minneapolis, MN 55345

Installation Description:

This installation is an architectural window manufacturing installation, located in Barry County. Aluminum is extruded, cut, shaped, welded, finished, 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 VOCs and HAPs. This installation is subject to federal regulations MACT MMMM, MACT ZZZZ, and MACT DDDDD. It is not on the List of Named Installations.


Prepared by
Kasia Wasescha
Operating Permit Unit


Director or Designee
Department of Natural Resources

DEC 08 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Point	Description	Control Device ¹
EP07	Burner Tubes for Alkaline Cleaner (Natural Gas); (2) 2.77 MMBtu/hr	-
EP-CME ²	Chromator - Acid Spray Cleaner	CME (Chrome Mist Eliminator)
	Chromator - Spray Chromate Phosphate	
EP09	Burner Tubes – Chromate Phosphate Conversion Coat (Natural Gas); 1.55 MMBtu/hr	-
EP12	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min	Paint Overspray Filters; RTO Protection Filters; EP-RTO
EP13	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min	
EP14	Primer Flash-off	EP-RTO
EP15	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min	Paint Overspray Filters; RTO Protection Filters; EP-RTO
EP16	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min	
EP17	Manual Topcoat Booth; one electrostatic manual gun; max 10 oz/min	
EP18	Manual Topcoat Booth; one manual gun; max 10 oz/min	
EP19	Topcoat Flash-off	EP-RTO
EP20	Manual Topcoat Booth; one manual gun; max 10 oz/min	Paint Overspray Filters; RTO Protection Filters; EP-RTO
EP21	Manual Topcoat Booth; one manual gun; max 10 oz/min	
EP22	Manual Topcoat Booth; one manual gun; max 10 oz/min	
EP23	Manual Topcoat Booth; one manual gun; max 10 oz/min	
EP24	Final Flash-off	EP-RTO
EP25	Paint Curing Oven (Natural Gas); 6 MMBtu/hr	-
EP30	Caustic Aluminum Etching Bath	-
EP32	Sulfuric Acid Anodizing of Aluminum	-
EP32-4	Sulfuric Acid Anodizing Tank #4 (7,000 gal)	Packed Bed Wet Scrubber
EP33	Boiler – Anodized Dept (Natural Gas); 4.2 MMBtu/hr	-
EP34	Boiler – Anodized Dept (Natural Gas); 4.2 MMBtu/hr	-
EP41, EP42	Fill Machine (Fill & Debridge); 0.096 lb/hr	-
EP46	Vinyling & Sealing Operations; 0.002 ton VOC/hr	-
EP47	Window Cleaning; 0.0165 ton VOC/hr	-
EP48	Final Seal	-
EP55	(120) Space Heaters (Natural Gas); 31.2 MMBtu/hr total, <10 MMBtu/hr individually	-
EP60	Samples Paint Lab Spray Booth; 0.0124 lb/hr	-
EP64	Air Makeup Unit (Natural Gas); 2.5 MMBtu/hr	-

¹ Control devices listed are federally enforceable by this operating permit. While other control devices may be used on EFCO's emission sources, they have not been listed due to their use not being required.

² EP-CME was previously known as EP08 and EP10.

Emission Point	Description	Control Device ¹
EP65	Manual Off-line Paint Booth; one manual gun; max 10 oz/min	Paint Overspray Filters; RTO Protection Filters; EP-RTO
EP66	Off-line Paint Oven (Natural Gas); 1.6 MMBtu/hr	EP-RTO
EP67 (EP-RTO)	Regenerative Thermal Oxidizer (Natural Gas); 6 MMBtu/hr	-
EP70	Back-up Emergency Generator (Diesel); 212 hp, installed October 2005	-

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. Plantwide conditions still apply to these emission sources.

Emission Point	Description
EP01	7" Aluminum Billet Preheat Oven (Natural Gas); 5.5 MMBtu/hr
EP05	7" Aluminum Extrusion Aging Oven (Natural Gas); 5 MMBtu/hr
EP06	Extrusion Die Cleaning; NaOH solution
EP11	Post Conversion Coating – Drying Oven (Natural Gas); 1.55 MMBtu/hr
EP28	Paint Hanger Burn-Off Oven (Natural Gas); 0.95 MMBtu/hr
EP38	(4) Glass Pane Edge – Sander; 0.0016 lb/hr
EP43	Aluminum Milling Machine Oil; 0.0329 gal/hr
EP44	Aluminum Welding (Maintenance) ; 0.0002 1000lb wire/hr
EP45	Aluminum Wire GMAC Welding; 0.0002 1000lb wire/hr
EP49	Alum-A-Lub Lubricant Usage; 0.057 lb/hr
EP50	8" Aluminum Billet Preheat Oven (Natural Gas); 5.4 MMBtu/hr
EP54	8" Aluminum Extrusion Aging Oven (Natural Gas); 5 MMBtu/hr
EP62	East 8" Aluminum Billet Preheat Oven (Natural Gas); 6.4 MMBtu/hr
EP63	East 8" Aluminum Extrusion Aging Oven (Natural Gas); 5 MMBtu/hr
EP68	Break Cleaner; 0.283 lb/hr
EP69	Aerosol Paint Usage; 0.1848 lb/hr
-	(27) Anodize Department Tanks (sixteen 5,700 gal; one 6,500 gal; seven 7,000 gal; one 7,100 gal; one 9,500 gal; one 16,000 gal)
-	(3) Anodize/Waste Water Tanks (two 5,000 gal; 5,500 gal)
-	(6) Extrusion Tanks (one 650 gal; one 2,000 gal; one 3,000 gal; one 3,750 gal; one 3,800 gal; one 4,500 gal)
-	(5) Paint Department Tanks (one 1,050 gal; three 2,100 gal; one 3,500 gal)
-	(8) Waste Water Tanks (one 200 gal; two 2,000 gal; two 3,000 gal; one 6,500 gal; two 10,000 gal)

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 022010-001B, issued December 14, 2010

Operational Limitations:

1. The permittee shall keep all solvents and cleaning solutions in sealed containers whenever the materials are not in use. [Special Condition 3C]
2. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used. [Special Condition 3C]

Reporting:

The permittee shall report any deviations from the limitations and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 022010-001B, issued December 14, 2010

Emission Credits:

In order to take credit for VOC content in material waste in the Emissions Inventory Questionnaire (EIQ), the permittee shall obtain the VOC content of the material waste for each shipment of waste from the waste collector vendors or the permittee shall conduct their own VOC content analysis on every shipment of waste using an approved Environmental Protection Agency (EPA) method. [Special Condition 10]

Recordkeeping:

1. Records of VOC content for each shipment shall be maintained for no less than five (5) years. [Special Condition 10]
2. The permittee shall make these records available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 10]

Reporting:

The permittee shall report any deviations from the limitations, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V 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.

PERMIT CONDITION 001	
10 CSR 10-6.060 Construction Permits Required Construction Permit 022010-001B, issued December 14, 2010	
Emission Point	Description
EP55	(120) Space Heaters (Natural Gas); 31.2 MMBtu/hr total, < 10 MMBtu/hr individually
EP64	Air Makeup Unit (Natural Gas); 2.5 MMBtu/hr

Operational Limitation:

1. The permittee shall not exceed 2,630 hours of operation for each space heater (EP55) per calendar year. [Special Condition 4A]
2. The permittee shall not exceed 6,130 hours of combustion of natural gas in the air makeup unit (EP64) per calendar year. [Special Condition 4B]

Monitoring/Recordkeeping:

1. Compliance with the operational limitation shall be demonstrated through the most current Emission Inventory Questionnaire (EIQ) submittal. [Special Condition 7G]
2. All records shall be maintained onsite for a minimum of five (5) years.
3. All records shall be immediately available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the calendar year during which records indicate an exceedance of either of the operational limits.

PERMIT CONDITION 002		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit 022010-001B, issued December 14, 2010		
Emission Point	Description	Control Device
EP-CME	Chromator - Acid Spray Cleaner	CME (Chrome Mist Eliminator)
	Chromator - Spray Chromate Phosphate	

Emission Limitation:

The permittee shall not emit more than 1.14 pounds of hexavalent chromium from the chromator (EP-CME) in any consecutive 12-month period. [Special Condition 4C]

Operational Limitation:

1. The permittee shall use the chrome mist eliminator (CME) at all times the chromator (EP-CME) is operational.
2. The permittee shall have pressure drop gauges/meters installed on the CME which can be easily viewed by Department of Natural Resources personnel.
3. The permittee shall keep replacement mesh pads on hand and the mesh pads shall be made of fibers appropriate for operating conditions expected to occur.
4. The permittee shall operate the CME in accordance with its design limitations and in accordance with all sets of instructions supplied by the manufacturer.

Monitoring/Recordkeeping:

1. Attachment A, or an equivalent form, shall be used by the permittee to demonstrate compliance with the emission limitation. [Special Condition 7H]
2. Attachment E, or an equivalent form, shall be used by the permittee to record the pressure drop daily across the CME.
3. The permittee shall maintain an operating and maintenance log (Attachment C or an equivalent) for the filters, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
 - c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection.
4. The permittee shall keep copies of all instructions and specifications supplied by the CME's manufacturer on-site.
5. All records shall be maintained onsite for a minimum of five (5) years.
6. All records shall be immediately available to any Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than

ten (10) days after the end of the month during which records indicate an exceedance of the emission limit.

PERMIT CONDITION 003	
10 CSR 10-6.060 Construction Permits Required Construction Permit 022010-001B, issued December 14, 2010	
Emission Point	Description
EP12	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min
EP13	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min
EP14	Primer Flash-off
EP15	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min
EP16	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min
EP17	Manual Topcoat Booth; one electrostatic manual gun; max 10 oz/min
EP18	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP19	Topcoat Flash-off
EP20	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP21	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP22	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP23	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP24	Final Flash-off
EP25	Paint Curing Oven (Natural Gas); 0.95 MMBtu/hr
EP65	Manual Off-line Paint Booth; one manual gun; max 10 oz/min
EP66	Off-line Paint Oven (Natural Gas); 0.74 MMBtu/hr

Emission Limitation:

The permittee shall not emit more than 33.73 pounds of hexavalent chromium from the painting operations listed in this condition in any consecutive 12-month period. [Special Condition 4D]

BACT Limitations:

1. The permittee shall not exceed 6.25 pounds of VOC per gallon of paint or per gallon of primer. [Special Condition 2B(2)]
2. The permittee shall not exceed a dilution ratio of 1 gallon of paint and primer combined to 0.55 gallons of solvent in a calendar year based on actual usage amounts. [Special Condition 2B(3)]

Monitoring/Recordkeeping:

1. The permittee shall demonstrate compliance with the VOC concentration limitation by maintaining a set of all Safety Data Sheets (SDS) for all paints and primers used in the painting operations. [Special Condition 7E]
2. The permittee shall demonstrate compliance with the dilution ratio limitation on a quarterly basis. Purchase records from the vendor may be used in lieu of actual usage amounts. [Special Condition 7F]
3. To demonstrate compliance with the hexavalent chromium emission limitation, the permittee shall use Attachment B, or an equivalent form. [Special Condition 7H]
4. All records shall be maintained onsite for a minimum of five (5) years.
5. All records shall be immediately available to any Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which records indicate an exceedance of the emission limit and no later than ten day after the end of the calendar year during which records indicate an exceedance of the dilution ratio BACT limit.

PERMIT CONDITION 004			
10 CSR 10-6.060 Construction Permits Required			
Construction Permit 022010-001B, issued December 14, 2010			
Emission Point	Description	Booth	Control Device
EP12	Automatic primer booth; one electrostatic turbo bell; max 7 oz/min	1	Paint Overspray Filters; RTO Protection Filters
EP13	Automatic primer booth; one electrostatic turbo bell; max 7 oz/min	2	
EP15	Automatic primer booth; three electrostatic turbo bells; max 21 oz/min	3	
EP16	Automatic primer booth; three electrostatic turbo bells; max 21 oz/min	4	
EP17	Manual topcoat booth; one electrostatic manual gun; max 10 oz/min	5	
EP18	Manual topcoat booth; one electrostatic manual gun; max 10 oz/min	6	
EP20	Manual topcoat booth; one manual gun; max 10 oz/min	7	
EP21	Manual topcoat booth; one manual gun; max 10 oz/min	8	
EP22	Manual topcoat booth; one manual gun; max 10 oz/min	9	
EP23	Manual topcoat booth; one manual gun; max 10 oz/min	10	
EP65	Manual off-line booth; one manual gun; max 10 oz/min	Off-line	

Operational Limitation:

1. The permittee shall control particulate matter less than 10 microns in aerodynamic diameter (PM₁₀) emissions from the spray guns using paint booths equipped with paint overspray filters and/or RTO protection filters as specified in this condition. [Special Conditions 5F and 5G]
2. The paint booths, paint overspray filters, and RTO protection filters shall be maintained in accordance with the manufacturer’s specifications. [Special Conditions 5F and 5G]
3. Replacement overspray filters and RTO protection filters shall be kept on hand at all times. [Special Conditions 5F and 5G]
4. Spray gun(s) shall be operated in the appropriate paint booth as specified in this permit condition.[Special Condition 6]

5. The permittee shall only use coatings containing Cr VI in booths using electrostatic turbo bells.

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the RTO filters at least once daily using Attachment E or an equivalent.
2. The permittee shall maintain an operating and maintenance log (Attachment C or an equivalent) for the filters, which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
 - c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection.
3. The permittee shall maintain a copy of the manufacturer's specifications on-site.
4. The permittee shall keep records on-site for a minimum of five (5) years.
5. The permittee shall make these records immediately available to Missouri Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 005			
10 CSR 10-6.060 Construction Permits Required			
Construction Permit 022010-001B, issued December 14, 2010			
Emission Point	Description	Control Device	
EP12	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min	EP-RTO	
EP13	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min		
EP14	Primer Flash-off		
EP15	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min		
EP16	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min		
EP17	Manual Topcoat Booth; one electrostatic manual gun; max 10 oz/min		
EP18	Manual Topcoat Booth; one manual gun; max 10 oz/min		
EP19	Topcoat Flash-off		
EP20	Manual Topcoat Booth; one manual gun; max 10 oz/min		
EP21	Manual Topcoat Booth; one manual gun; max 10 oz/min		
EP22	Manual Topcoat Booth; one manual gun; max 10 oz/min		
EP23	Manual Topcoat Booth; one manual gun; max 10 oz/min		
EP24	Final Flash-off		
EP25	Paint Curing Oven (Natural Gas); 6 MMBtu/hr		
EP65	Manual Off-line Paint Booth; one manual gun; max 10 oz/min		
EP66	Off-line Paint Oven (Natural Gas); 0.74 MMBtu/hr		
EP67 (EP-RTO)	Regenerative Thermal Oxidizer (Natural Gas); 6 MMBtu/hr		-

Operational Limitation:

1. The permittee shall effectively operate a Regenerative Thermal Oxidizer (EP67) for the control of VOCs and volatile hazardous air pollutants (VHAPs) from the painting operations as listed in this permit condition. [Special Condition 5A]
2. The natural gas-fired RTO must be in use at all times when any of the equipment listed in this permit condition are in operation. [Special Condition 5B]
3. The permittee shall completely capture and vent all VOC emissions associated with the painting operations to the RTO. [Special Condition 5E]
4. The RTO shall achieve either a minimum of 98% destruction of volatile organic compounds (VOCs) from the paint line or a concentration of less than 20 ppm as hydrocarbon out of the exhaust of the RTO, whichever is greater.³ [Special Condition 2B(1)]
5. The thermal oxidizer shall be operated and maintained in accordance with the manufacturer's specifications to ensure the required minimum VOC destruction efficiency. [Special Condition 5B]
6. The destruction/removal efficiency shall be verified through compliance testing. [Special Condition 5B]

³ Stack testing performed on May 13, 2015 demonstrated that the RTO destruction efficiency was 98.05% and the RTO outlet VOC concentration was 16.0 ppm, (wet) while assuming 100% capture efficiency.

7. The operating temperature of the RTO shall be continuously monitored and recorded during operation. The operating temperature of the RTO shall equal or exceed 1,625°F, as determined during the May 13, 2015 compliance test. [Special Condition 5C]

Compliance Testing:

1. The permittee shall conduct the following compliance tests once every 5 years from the date of the most recent compliance test. [Special Condition 7D]
 - a) Demonstration of 100% capture of VOC emissions associated with the painting operations; and
 - b) Demonstration of compliance of the RTO with the required destruction efficiency or 20 ppm as hydrocarbon outlet, whichever is greater.
2. Compliance testing of the RTO shall be conducted under representative production and process rates of the painting operations. [Special Condition 7B]
3. A completed Proposed Test Plan Form must be submitted to the Air Pollution Control Program thirty (30) days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director of the Missouri Air Pollution Control Program prior to conducting the required emission testing. [Special Condition 8A]
4. Two (2) copies of a written report of the compliance test results shall be submitted to the Director of the Air Pollution Control Program within sixty (60) days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA Method for at least one (1) sample run. [Special Condition 8C]
5. If the compliance test results indicate that the RTO's destruction efficiency and emission of hydrocarbon concentration limitations of this condition are not met, the permittee must propose a plan to the Air Pollution Control Program within thirty (30) days of submitting the compliance test results. This plan must demonstrate how the permittee will reduce emission rates in order to show compliance. The plan shall become immediately effective upon its approval by the Director. [Special Condition 8C]

Monitoring/Recordkeeping:

1. The permittee shall retain the most recent stack test on-site.
2. The permittee shall retain records that demonstrate that the installation has 100% capture efficiency of VOCs associated with the painting operations using an EPA approved testing method agreed upon with the Air Pollution Control Program. [Special Condition 7A]
3. The permittee shall maintain an operating, maintenance, and inspection log (Attachment C or an equivalent) for the RTO which shall include the following: [Special Condition 5D]
 - a) Incidents of malfunction(s), with impact on emissions, date(s) and duration of the event, probable cause, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
 - c) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection.
4. All records shall be maintained onsite for a minimum of five (5) years.
5. All records shall be immediately available to any Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

PERMIT CONDITION 006	
10 CSR 10-6.060 Construction Permits Required Construction Permit 022010-001B, issued December 14, 2010	
Emission Point	Description
EP47	Window Cleaning; 0.0165 ton VOC/hr

Operational Limitation:

1. The permittee shall maintain and operate, as a BACT requirement, in accordance with the submitted Best Practices document for usage of isopropyl alcohol (IPA) for window/door cleanup. See Attachment D. [Special Condition 3A]
2. The permittee shall review and update the Best Practices document for usage of IPA for window/door cleanup at minimum once every two (2) years. Any updates to the Best Practices document shall not lessen the requirements that have already been approved by the Air Pollution Control Program. [Special Condition 3B]

Recordkeeping:

1. The permittee shall keep the Best Practices document on-site.
2. The most recent Best Practices document shall be immediately available to any Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 007		
10 CSR 10-6.060 Construction Permits Required Construction Permit 032010-005, issued March 11, 2010		
Emission Point	Description	Control Device
EP32-4	Sulfuric Acid Anodizing Tank #4 (7000 gal)	Packed Bed Wet Scrubber

Operational Limitation:

1. The permittee shall control the sulfuric acid anodizing tank #4 (EP32-4) with a packed bed wet scrubber. [Special Condition 1]
 - a) The scrubber and any related instrumentation or equipment shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 1A]
 - b) The scrubber shall be equipped with a gauge or meter that indicates the pressure drop across the scrubber and with a flow meter that indicates the flow through the scrubber. These gauges and meters shall be located in such a way that they may be easily observed by Department of Natural Resources' personnel. [Special Condition 1A]
2. The operating pressure drop across the scrubber shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 1B]
3. The flow rate through the scrubber shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 1C]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the scrubber at least once daily using Attachment E or an equivalent. [Special Condition 1B]
2. The permittee shall monitor and record the water flow rate through the scrubber at least once daily. [Special Condition 1C]
3. The permittee shall maintain an operating and maintenance log (Attachment C or an equivalent) for the scrubber, which shall include the following: [Special Condition 1D]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
 - c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection.
4. The permittee shall maintain a copy of the manufacturer's specifications and performance warranty for the scrubber on-site.
5. All records shall be maintained onsite for a minimum of five (5) years.
6. All records shall be immediately available to any Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 008	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart M – National Emission Standards for Hazardous Air Pollutants for Surface Coatings of Miscellaneous Metal Parts and Products	
Emission Point	Description
EP12	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min
EP13	Automatic Primer Booth; one electrostatic turbo bell; max 7 oz/min
EP15	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min
EP16	Automatic Topcoat Booth; three electrostatic turbo bells; max 21 oz/min
EP17	Manual Topcoat Booth; one electrostatic manual gun; max 10 oz/min
EP18	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP20	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP21	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP22	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP23	Manual Topcoat Booth; one manual gun; max 10 oz/min
EP46	Vinyling & Sealing Operations; 0.002 ton VOC/hr
EP47	Window Cleaning; 0.0165 ton VOC/hr
EP48	Final Seal
EP60	Samples Paint Lab Spray Booth; 0.0124 lb/hr
EP65	Manual Off-line Paint Booth; one manual gun; max 10 oz/min

Emission Limitation:

The permittee shall limit organic HAP emissions to the atmosphere to no more than 3.3 kg organic HAP per liter (27.5 lb organic HAP per gallon) of 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) & §63.3890(b)(2)]

Compliance Options:

1. The permittee shall include all coatings (as defined in §63.3981), thinners, and/or other additives, and cleaning materials used in the affected sources when determining whether the organic HAP emission rate is equal or less than the applicable emission limit in §63.3890. To make this determination, the permittee must use at least one of the three compliance options listed in §63.3891(a) through (c). The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by §63.3930(c), and they must report it in the next semiannual compliance report required in §63.3920. [§63.3891]
 - a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee shall meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option. [§63.3891(a)]

- b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee shall meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. [§63.3891(b)]
- c) *Emission rate with add-on controls option.* Demonstrate that, based on the coatings, thinners, and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emissions rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. If the permittee uses this compliance option, they must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s) meet the operating limits required in §63.3892, except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to §63.3961(j), and that the permittee meets the work practice standards required in §63.3893. The permittee must meet all requirements of §§63.3960 through 63.3968 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option. [§63.3891(c)]

Compliant Material Option

General Requirements:

1. The permittee shall be in compliance with the emission limitations as specified in §63.3900(a)(1). [§63.3900(a)]
 - a) Any coating operation(s) for which the permittee uses the compliant material option, as specified in §63.3891(a), shall be in compliance with the applicable emission limit in §63.3890 at all times. [§63.3900(a)(1)]
2. The permittee shall always operate and maintain the affected source, including all air pollution control and monitoring equipment the permittee uses for purposes of compliance, according to the provisions in §63.6(e)(1)(i). [§63.3900(b)]

General Provisions:

The permittee shall comply with the applicable General Provisions in §§63.1 through 63.15 as listed in Table 2 to MACT MMMM.

Compliance Requirements:

1. The permittee may use the compliant material 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. The permittee shall use the emission rate with add-on controls option for any coating operation in the affected source for which the permittee does not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations shall use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and shall use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to §63.3941. The permittee shall conduct a separate initial compliance demonstration for each general use coating operation. The permittee shall meet all the requirements of §63.3941. Use the procedures in §63.3941 on each coating, thinner, and/or other

additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alternation. The permittee does not need to re-determine the organic HAP content of coatings, thinners, and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that the permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which the permittee uses the compliance material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. [§63.3941]

- a) *Determine the mass fraction of organic HAP for each material used.* The permittee shall 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 following options: [§63.3941(a)]
- i) *Method 311 (Appendix A to 40 CFR Part 63).* The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the following procedures when performing a Method 311 test: [§63.3941(a)(1)]
- (1) 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, the permittee does not have to count it. Express the mass fraction of each organic HAP the permittee counts as a value truncated to four places after the decimal point (e.g., 0.3791). [§63.3941(a)(1)(i)]
- (2) 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)(ii)]
- ii) *Method 24 (Appendix A to 40 CFR Part 60).* For coatings, the permittee 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, the permittee may use the alternative method contained in Appendix A to Subpart P of Part 63, rather than Method 24. The permittee may use the volatile fraction that is emitted, as measured by the alternative method in Appendix A to Subpart P of Part 63, as a substitute for the mass fraction of organic HAP. [§63.3941(a)(2)]
- iii) *Alternative Method.* The permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(a)(3)]
- iv) *Information from the supplier or manufacturer of the material.* The permittee 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, the permittee does not have to count it. For reactive adhesives in which some of the HAP react to form solids that are not emitted to the atmosphere, the permittee 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, the permittee demonstrates to the satisfaction of the Air Pollution Control Program that the formulation data are correct. [§63.3941(a)(4)]

- v) 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 shall be counted towards the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 of Part 63, Subpart Mmmm. If the permittee uses the tables, the permittee shall use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and the permittee may use Table 4 only if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table 3 and the permittee knows 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 of Part 63, Subpart Mmmm, the Method 311 results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the Air Pollution Control Program that the formulation data are correct. [§63.3941(a)(5)]

Table 3 to Subpart MMMM of Part 63 – Default Organic HAP Mass Fraction for Solvents and Solvent Blends

Solvent/Solvent Blend	CAS. No.	Average Organic HAP Mass Fraction	Typical Organic HAP, wt%
Toluene	108-88-3	1.0	Toluene
Xylene(s)	1330-20-7	1.0	Xylenes, Ethylbenzene
Hexane	110-54-3	0.5	n-Hexane
n-Hexane	110-54-3	1.0	n-Hexane
Ethylbenzene	100-41-4	1.0	Ethylbenzene
Aliphatic 140	--	0	None
Aromatic 100	--	0.02	1% Xylene, 1% Cumene
Aromatic 150	--	0.09	Naphthalene
Aromatic Naphtha	64742-95-6	0.02	1% Xylene, 1% Cumene
Aromatic Solvent	64742-94-5	0.1	Naphthalene
Exempt Mineral Spirits	8032-32-4	0	None
Ligroines (VM&P)	8032-32-4	0	None
Lactol Spirits	64742-89-6	0.15	Toluene
Low Aromatic White Spirit	64772-82-1	0	None
Mineral Spirits	64742-88-7	0.01	Xylenes
Hydrotreated Naphtha	64742-48-9	0	None
Hydrotreated Light Distillate	64742-47-8	0.001	Toluene
Stoddard Solvent	8052-41-3	0.01	Xylenes
Super High-Flash Naphtha	64742-95-6	0.05	Xylenes
Varsol [®] Solvent	8052-49-3	0.01	0.5% Xylenes, 0.5% Ethylbenzene
VM&P Naphtha	64742-89-8	0.06	3% Toluene, 3% Xylene
Petroleum Distillate Mixture	6877-31-6	0.08	4% Naphthalene, 4% Biphenyl

Table 4 to Subpart MMMM of Part 63 – Default Organic HAP Mass Fraction for Petroleum Solvent Groups^a

Solvent Type	Average Organic HAP Mass Fraction	Typical Organic HAP, wt%
Aliphatic ^b	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene
Aromatic ^c	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene

^aUse this table only if the solvent blend does not match any of the solvent blends in Table 3 to Part 63, Subpart MMMM by either solvent blend name or CAS number and the permittee only knows whether the blend is aliphatic or aromatic.

^bMineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

^cMedium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

- b) *Determine the volume fraction of coating solids for each coating.* The permittee shall 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)(1) or (4), the test results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. [§63.3941(b)]
- i) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).* The permittee 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 to determine the volume fraction of coating solid 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)]
- ii) *Alternative method.* The permittee may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. The permittee shall follow the procedure in §63.7(f) to submit an alternative test method for approval. [§63.3941(b)(2)]
- iii) *Information from the supplier or manufacturer of the material.* The permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer. [§63.3941(b)(3)]
- iv) *Calculation of volume fraction of coating solids.* The permittee may determine the volume fraction of coating solids using Equation 1 of §63.3941: [§63.3941(b)(4)]

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

Where:

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

$m_{volatiles}$ = 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_{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 the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

- c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period 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 specific gravity data for pure

chemicals. If there is disagreement between ASTM Method D1475–98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the Air Pollution Control Program that the formulation data are correct. [§63.3941(c)]

- d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of §63.3941: [§63.3941(d)]

$$H_c = \frac{(D_c)(W_c)}{V_c} \quad (\text{Eqn. 2})$$

Where:

H_c = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c = Density of coating, kg coating per liter (gal) coating, determined according to §63.3941(c).

W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to §63.3941(a).

V_s = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to §63.3941(b).

- e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period shall be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period shall contain no organic HAP, determined according to §63.3941(a). The permittee shall retain all records required by §§63.3930 and 63.3931. [§63.3941(e)]
2. For each compliance period to demonstrate continuous compliance, the permittee shall use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, is the end of a compliance period consisting of that month and the preceding 11 months. [§63.3942(a)]

Recordkeeping:

1. The permittee shall collect and retain records of the data and information specified in §63.3930. Failure to collect and retain these records is a deviation from the applicable standard. [§63.3930]
- a) A copy of each notification and report that the permittee submitted to comply with Part 63, Subpart MMMM, and the documentation supporting each notification and report. [§63.3930(a)]
- b) 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. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee shall retain a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee shall retain the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
- c) For each compliance period, the following records: [§63.3930(c)]

- i) A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used. [§63.3930(c)(1)]
- ii) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941. [§63.3930(c)(2)]
- d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
- e) 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)]
- f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
- g) The permittee shall retain records of the date, time, and duration of each deviation. [§63.3930(j)]
2. The records shall 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)]
3. As specified in §63.10(b)(1), the permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
4. The permittee shall retain each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may retain the records off-site for the remaining three years. [§63.3931(c)]

Reporting:

1. *Semi-annual compliance reports.* The permittee shall submit semi-annual compliance reports for each affected source according to the requirements of §63.3920(a)(1) through (5). The semi-annual 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), the permittee shall prepare and submit each semi-annual compliance report according to the dates specified in §63.3920(a)(1)(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) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A), the permittee shall submit the first and subsequent compliance reports according to the dates the permitting authority has established. [§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 shall report all deviations as defined in Part 63, Subpart M in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If an affected source submits a semi-annual compliance report pursuant to §63.3920 along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semi-annual compliance report includes all required information concerning deviations from any emission limitation in Part 63, Subpart M, its submission will be deemed to satisfy any obligation to

report the same deviations in the semi-annual monitoring report. However, submission of a semi-annual 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 semi-annual compliance report shall contain the information specified in §63.3920(a)(3)(i) through (iv), and the information specified in §63.3920(a)(4) and (5) that is applicable. [§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 six-month period ending on June 30 or December 31. Note that the information reported for each of the six 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 the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee shall report the beginning and ending dates for each option the permittee used. [§63.3920(a)(3)(iv)]
- d) *No deviations.* If there were no deviations from the emission limitations in §63.3890 that apply, the semi-annual compliance report shall include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- e) *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semi-annual compliance report shall contain the following information: [§63.3920(a)(5)]
 - i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [§63.3920(a)(5)(i)]
 - ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports). [§63.3920(a)(5)(ii)]
 - iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in §63.3920(a)(5)(i). The permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports). [§63.3920(a)(5)(iii)]
 - iv) A statement of the cause of each deviation. [§63.3920(a)(5)(iv)]

PERMIT CONDITION 009	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Point	Description
EP70	Back-up Emergency Generator (Diesel); 212 hp; installed October 2005

Operational Limitation:

1. The permittee must meet the requirements in Table 2c of MACT ZZZZ that apply to EP70. [§63.6602]

- a) Change oil and filter every 500 hours of operation or annually, whichever comes first⁴.
- b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
- c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

General Compliance Requirements:

1. The permittee must be in compliance with the operating limitations in this permit condition at all times. [§63.6605(a)]
2. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]
3. The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or the permittee shall develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)(2)]
4. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]

General Provisions:

The permittee shall comply with each of the General Provisions that apply to the emergency engine as listed in Table 8 of MACT ZZZZ. [§63.6640(e)]

Continuous Compliance Requirements:

1. The permittee shall demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
 - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2. The permittee shall report each instance in which they did not meet the requirements of this permit condition or Table 2c of MACT ZZZZ according to the requirements in §63.6650. [§63.6640(b)]
3. The permittee shall report each instance which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
4. The emergency generator shall be operated according to the following requirements: [§63.6640(f)]

⁴ Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2 of MACT ZZZZ.

- a) There is no time limit on the use of the emergency generator in emergency situations. [§63.6640(f)(1)]
- b) The permittee may operate the emergency generator for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
 - i) The emergency generator may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency generator beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
- c) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(3)]

Notifications:

The permittee shall submit required notifications as specified in §63.6645.

Recordkeeping:

1. The permittee shall keep the following records: [§63.6655(a)]
 - a) A copy of each notification and report that they submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
 - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
2. The permittee must keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that they operated and maintained the stationary RICE according to their own maintenance plan. [§63.6655(e)]

4. The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§63.6655(f)]
5. Records may be kept in either written or electronic form and maintained for at least five years. [§63.6660(c)]
6. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request. [§63.6660(a)]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 010	
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions	
Emission Point	Description
EP70	Back-up Emergency Generator (Diesel); 212 hp; installed October 2005

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement⁵

Operational Limitation:

Fuel sulfur content will not contain more than 8,812 parts per million (ppm_v) of sulfur for distillate fuel.

Monitoring/Recordkeeping:

1. The permittee shall determine compliance using fuel delivery records, fuel sampling and analysis, performance tests, continuous emission monitoring, or other compliance methods approved by the staff director and the U.S. Environmental Protection agency and incorporated into the state implementation plan.
2. The permittee must maintain a record of data, calculations, results, records and reports from any performance test, continuous emission monitoring, fuel deliveries, and/or fuel sampling tests.
3. The permittee must maintain a record of any applicable monitoring data, performance evaluations, calibration checks, monitoring system and device performance tests, and any adjustments and maintenance performed on these systems or devices.
4. If the permittee is using fuel delivery records for compliance they must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
 - a) The name, address, and contact information of the fuel supplier;

⁵ This regulation has not yet been adopted into Missouri's SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action on the part of the permittee is needed to revise the operating permit.

- b) The type of fuel;
 - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
 - d) The heating value of the fuel.
5. The permittee shall maintain records for a minimum of five (5) years on-site.
 6. The permittee shall make all records immediately available to Missouri Department of Natural Resources personnel upon request.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

PERMIT CONDITION 011	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds ⁶	
Emission Point	Description
EP70	Back-up Emergency Generator (Diesel); 212 hp; installed October 2005

Emission Limitation:

1. The permittee shall not allow the emission in the atmosphere gases containing more than five hundred parts per million by volume (500 ppm_v) of sulfur dioxide from the engine.
2. Stack gases from the engine shall not contain more than thirty five milligrams per cubic meter (35 mg/m³) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period.

Monitoring/Recordkeeping:

As required by Permit Condition 010.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

⁶ This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable regulation. Upon adoption of 10 CSR 10-6.261 into Missouri’s SIP, 10 CSR 6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, Permit Condition 010 shall no longer be enforceable.

PERMIT CONDITION 012	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	
Emission Point	Description
EP07	Burner Tubes for Alkaline Cleaner (Natural Gas); 2.77 MMBtu/hr
EP09	Burner Tubes – Chromate Phosphate Conversion Coat (Natural Gas); 1.55 MMBtu/hr
EP33	Boiler – Anodized Dept (Natural Gas); 4.2 MMBtu/hr
EP34	Boiler – Anodized Dept (Natural Gas); 4.2 MMBtu/hr

Work Practice Standards

1. At all times, the permittee must operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.7500(a)(3)]
2. The permittee must complete tune-ups on the emission points of this permit condition as follows: [§63.7500(e)]

Emission Point	Description	Standard
EP09	Burner Tubes – Chromate Phosphate Conversion Coat (Natural Gas); 4.7 MMBtu/hr	Must complete a tune-up every 5 years as specified in §63.7540.
EP33	Boiler – Anodized Dept (Natural Gas); 4.2 MMBtu/hr	
EP34	Boiler – Anodized Dept (Natural Gas); 4.2 MMBtu/hr	
EP07	Burner Tubes for Alkaline Cleaner (Natural Gas); 5.54 MMBtu/hr	Must complete a tune-up every 2 years as specified in §63.7540.

Continuous Compliance:

1. The permittee shall conduct a tune-up of the boiler or process heater as specified to demonstrate continuous compliance: [§63.7540(a)(11)]
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). All units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. [§63.7540(a)(10)(i)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available. [§63.7540(a)(10)(ii)]

- c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). [§63.7540(a)(10)(iii)]
 - d) Optimize total emissions of CO. The optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. [§63.7540(a)(10)(iv)]
 - e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [§63.7540(a)(10)(v)]
 - f) Maintain on-site and submit, if requested by the Director, a report containing the following information: [§63.7540(a)(10)(vi)]
 - i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. [§63.7540(a)(vi)(A)]
 - ii) A description of any corrective actions taken as a part of the tune-up. [§63.7540(a)(vi)(B)]
 - iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. [§63.7540(a)(vi)(C)]
2. If an affected unit is not operating on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. [§63.7540(a)(13)]

General Compliance Requirements:

The permittee must be in compliance with the work practice standards in this permit condition. These emission and operating limits apply to the permittee at all times the affected unit is operating. [§63.7500(f) & §63.7505(a)]

General Provisions:

The permittee shall comply with the applicable General Provisions in §§63.1 through 63.15 as listed in Table 10 to MACT DDDDD that apply.

Monitoring/Recordkeeping:

1. The permittee must keep a copy of each notification and report that was submitted to comply with MACT DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that was submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]
2. The permittee shall keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). [§63.7560(a)]
3. As specified in §63.10(b)(1), the permittee must keep each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.7560(b)]
4. The permittee must keep each record on site, or they must be accessible from on site, for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records off site for the remaining 3 years. [§63.7560(c)]

Reporting:

1. The permittee must submit each report as follows: [§63.7550(a) & Table 9 of MACT DDDDD]
 - a) The permittee must submit each report, according to §63.7550(h) biennially or every 5 years (as applicable to each unit's tune-up schedule) according to the requirements in §63.7550(b)(1) through (4). [§63.7550(b)]
 - i) The first biennial and 5-year compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in §63.7495 and ending on December 31 within 2 or 5 years, as applicable, after the compliance date that is specified for the applicable source in §63.7495. [§63.7550(b)(1)]
 - ii) The first biennial and 5-year compliance report must be postmarked or submitted no later than January 31 for each boiler or process heater in §63.7495. [§63.7550(b)(2)]
 - iii) Biennial and 5-year compliance reports must cover the applicable 2-, or 5-year periods from January 1 to December 31. [§63.7550(b)(3)]
 - iv) Biennial and 5-year compliance reports must be postmarked or submitted no later than January 31. [§63.7550(b)(4)]
 - b) A compliance report shall contain the following information: [§63.7550(c) & §63.7550(c)(1)]
 - i) Company and Facility name and address. [§63.7550(c)(1)(i)]
 - ii) Process unit information, emissions limitations, and operating parameter limitations. [§63.7550(c)(1)(ii)]
 - iii) Date of report and beginning and ending dates of the reporting period. [§63.7550(c)(1)(iii)]
 - iv) Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done biennially or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. [§63.7550(c)(1)(xiv)]
 - v) 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. [§63.7550(c)(1)(xvii)]
2. The permittee must submit the reports according to the procedures specified in §63.7550(h)(3): [§63.7550(h)]
 - a) The permittee must submit all reports required by Table 9 of MACT DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) You must use the appropriate electronic report in CEDRI for MACT DDDDD. Instead of using the electronic report in CEDRI for this subpart, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI website (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at this time and the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in §63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. [§63.7550(h)(3)]
3. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
4. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

PERMIT CONDITION 013	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Point	Description
EP-CME	Chromator - Acid Spray Cleaner
	Chromator - Spray Chromate Phosphate
EP30	Caustic Aluminum Etching Bath
EP32	Sulfuric Acid Anodizing of Aluminum
EP41, EP42	Fill Machine (Fill & Debridge); 0.096 lb/hr
EP60	Samples Paint Lab Spray Booth; 0.0124 lb/hr

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20%.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring/Recordkeeping:

Not required. See Statement of Basis.

Reporting:

1. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.
2. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

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.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) 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.

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 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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

10 CSR 10-6.170

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

Emission Limitation:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

This requirement is a State Only permit requirement.

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.

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 at an installation:
 - 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”;
 - 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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

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- c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

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

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and 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.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. 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)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

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

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

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

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

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

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

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

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

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, 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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the 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 permit, 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Douglas Dieleman, VP Operations. On June 15, 2017, the Air Pollution Control Program was informed that Douglas Dieleman,

VP of Operations is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the 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 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
IPA Best Practices for Window/Door Cleaning

Isopropyl Alcohol Best Practices for Window / Door Cleaning – SUMM

Per Permit to Construct – 022010-001

During assembly operations, excess sealant is squeezed from between the aluminum frame and the glass. Handling to position the glass and frame properly often smears the excess sealant on both the glass and the aluminum. The excess and smear must be removed before shipment.

Isopropyl alcohol (IPA) is used to soften/remove the smeared sealant. The process has several variations depending upon the amount and location of the excess. In general, the isopropyl alcohol is used on a rag to wipe up the smear.

1. EFCO will dispense IPA from **plunger cans** to wet rags for cleaning. Plunger cans must be used fully assembled as designed and repaired or replaced immediately if they do not work correctly. Plunger cans minimize the amount of IPA exposed to the atmosphere when not in use, while also being immediately available for use.



2. EFCO will provide secondary containment for the IPA storage container to collect spillage from the dispensing option.
3. EFCO will provide annual training to the operators regarding proper cleaning technique and the important of minimizing IPA use. EFCO will maintain records of the personnel trained and the dates on which the training occurred.
4. EFCO will maintain records of units produced and IPA used. These records will be used to track normalized VOC emissions per unit produced for management to review. New factors will be calculated each month and compared to the previous month.
5. Assembly department managers will be responsible for continuous improvement in their department.
6. Other dispensing methods and containers for Isopropyl Alcohol are not allowed to be used.

Sign off sheet required turn into the Safety Department when completed

Attachment F
10 CSR 10-6.400 Applicability Determination

This attachment demonstrates that EFCO is exempt from 10 CSR 10-6.400.

Emission Point	Description	MHDR	Solids ¹⁴ (%)	Transfer Efficiency ¹⁵ (%)	Control Efficiency ¹⁶ (%)	PTE (lb/hr)	Exempt?
EP12	Automatic Primer Booth	7 oz/min	25	75	99	< 0.01	Yes, > 95% control
EP13	Automatic Primer Booth	7 oz/min	25	75	99	< 0.01	Yes, > 95% control
EP15	Automatic Topcoat Booth	21 oz/min	25	75	99	0.01	Yes, > 95% control
EP16	Automatic Topcoat Booth	21 oz/min	25	75	99	0.01	Yes, > 95% control
EP17	Manual Topcoat Booth	10 oz/min	25	65	99	0.01	Yes, > 95% control
EP18	Manual Topcoat Booth	10 oz/min	25	15	99	0.02	Yes, > 95% control
EP20	Manual Topcoat Booth	10 oz/min	25	15	99	0.02	Yes, > 95% control
EP21	Manual Topcoat Booth	10 oz/min	25	15	99	0.02	Yes, > 95% control
EP22	Manual Topcoat Booth	10 oz/min	25	15	99	0.02	Yes, > 95% control
EP23	Manual Topcoat Booth	10 oz/min	25	15	99	0.02	Yes, > 95% control
EP60	Samples Paint Lab Spray Booth	0.0124 lb/hr	25	15	-	< 0.01	Yes, < 0.5 lb/hr
EP65	Manual Off-line Paint Booth	10 oz/min	25	15	99	0.01	Yes, > 95% control
EP-CME	Chromator	11.16 lb/hr	20	15	99.5	< 0.01	Yes, < 0.5 lb/hr
Emission Point	Description	MHDR	PM ₁₀ EF		EF Source	PTE (lb/hr)	Exempt?
EP38	(4) Glass Pane Edge-Sanders	0.0016 lb/hr	2000 lb/ton		Conservative Assum.	< 0.01	Yes, < 0.5 lb/hr
EP41, EP42	Fill Machine (Fill & Debridge)	0.096 lb/hr	2000 lb/ton		Conservative Assum	0.10	Yes, < 0.5 lb/hr
EP45	Aluminum Wire GMAC Welding	0.0002 1000lb wire/hr	5.2 lb/1000lb wire		Eng. Calc.	< 0.01	Yes, < 0.5 lb/hr
EP68	Brake Cleaner	0.283 lb/hr	2000 lb/ton		Conservative Assum	0.28	Yes, < 0.5 lb/hr
EP69	Aerosol Paint Usage	0.1848 lb/hr	2000 lb/ton		Conservative Assum	0.18	Yes, < 0.5 lb/hr

¹⁴ Solids percentage obtained from Construction Permit 022010-001.

¹⁵ Transfer efficiencies for booths obtained from Construction Permit 022010-001 and from APTI Course 482 Manual, 3rd edition, Chapter 5 "Surface Coating". The control efficiency only takes in account the RTO filter.

¹⁶ Control efficiency for the filters obtained from Construction Permit 022010-001. Control efficiency for the CME obtained from the manufacturer's guarantee.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

EFCO Corporation is an architectural window manufacturing installation, located in Barry County. Aluminum is extruded, cut, shaped, welded, finished, 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. It is not on the List of Named Installations per Table 2 of 10 CSR 10-6.020(3)(B).

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹⁷
PM ₁₀	15.86
PM _{2.5}	15.86
Sulfur Oxides (SO _x)	0.30
Nitrogen Oxides (NO _x)	34.54
Volatile Organic Compounds (VOCs)	181.50
Carbon Monoxide (CO)	28.09
Hazardous Air Pollutants (HAPs)	35.79
Xylene (1330-20-7)	11.47
Diethylene glycol monobutyl ether (112-34-5)	9.51
Methyl Isobutyl Ketone (108-10-1)	6.36
Dimethyl Phthalate (131-11-3)	3.09
Ethyl Benzene (100-41-4)	3.26
Toluene (108-88-3)	0.65
Chromium Oxide, trivalent (1308-38-9)	0.18
Cobalt Aluminate (1345-16-0)	0.18
Strontium Chromate, hexavalent (7789-06-2)	0.01
Copper Chromite (681-91-4)	0.34
Titanium chrome antimony buff (68186-90-3)	0.13
Calcined Ti, Ni, Sb oxides (800-18-9)	0.05
Co, Ti, Ni, Zn oxides (68186-85-6)	0.23

¹⁷ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

- HAP calculations were obtained from calculations for Construction Permit 022010-001B. Individual HAPs under 0.01 tons/year not listed.
- Transfer efficiency of 75% was used for booths with electrostatic turbo bells (from Construction Permit 022010-001C), 65% for electrostatic manual guns, and 15% for manual guns (from APTI Course 482 Manual, 3rd edition, Chapter 5 “Surface Coating”). A control efficiency of 99% (from Construction Permit 022010-001) was used for just the RTO filter. A utilization rate of 65.5% is taken in account due to EFCO’s inability to operate the paint booths every minute of the day (determined in Construction Permit 022010-001B).
- The emergency generator (EP70) was evaluated at 500 hours of annual operation.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.62	0.74	0.70	1.09	0.98
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.62	0.74	0.70	0.76	0.68
Sulfur Oxides (SO _x)	0.05	0.04	0.04	0.04	0.04
Nitrogen Oxides (NO _x)	8.09	7.46	7.34	7.51	6.85
Volatile Organic Compounds (VOC)	60.54	51.62	48.74	58.55	54.56
Carbon Monoxide (CO)	6.80	6.27	6.16	6.31	5.56
Hazardous Air Pollutants (HAPs)	3.55	3.96	4.15	5.60	4.14
Dimethyl Phthalate (131-11-3)	0.88	0.91	0.88	1.16	0.80
Ethylbenzene (100-41-4)	0.34	0.38	0.40	0.47	0.40
Formaldehyde (50-00-0)	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Glycol Ethers (20-10-0)	0.41	0.42	0.55	0.96	0.79
Isomers of Xylene (1330-20-7)	1.11	1.19	1.29	1.60	1.29
Methyl Isobutyl Ketone (108-10-1)	0.77	0.77	0.75	1.00	0.69
Toluene (108-88-3)	0.03	0.29	0.27	0.42	0.17

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 April 1, 2011;
- 2) 2016 Emissions Inventory Questionnaire, received April 13, 2017;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) WebFIRE;
- 5) Construction Permit 022010-001C, issued June 9, 2016
- 6) Construction Permit 022010-001B, issued December 14, 2010
- 7) Construction Permit 022010-001A, issued June 14, 2010
- 8) Construction Permit 032010-005, issued March 11, 2010

- 9) Construction Permit 022010-001, issued February 5, 2010
- 10) Construction Permit 012004-004, issued January 20, 2004
- 11) Construction Permit 052000-018, issued May 31, 2000
- 12) Construction Permit 1199-004, issued November 5, 1999
- 13) Construction Permit 0491-003, issued April 3, 1991

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

In the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart applies to the emergency generator, EP70. The emergency engine was not a part of the previous operating permit, hence why this subpart was not previously included. After being made aware of the emergency generator, MoDNR has applied this subpart within the permit.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

This subpart applies to several of the process heaters and boilers. This rule was put into effect March 21, 2011 and thus did not exist during renewal of the previous operating permit. It has been applied within this permit.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This state rule applies to the emergency generator, EP70. MoDNR was made aware of the emergency generator during renewal of this operating permit. Since the emergency generator was not a part of the previous operating permit, this rule was not applied previously.

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.

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

This rule does not apply. For 10 CSR 10-6.400 applicability determinations, see Attachment F. The natural gas-fueled equipment and the diesel-fueled emergency generator do not meet the definition of process weight in 10 CSR 10-6.020, thus this rule is not applicable to them.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

All the heating units at this facility are exempt from this rule per 10 CSR 10-6.405(1)(E) due to only combusting natural gas.

Construction Permit History

Construction Permit 022010-001C, issued June 9, 2016

This construction permit modifies and replaces Attachment B for Construction Permit 022010-001's Attachment B for lacking transfer efficiencies for its recordkeeping. There are no special conditions.

Construction Permit 022010-001B, issued December 14, 2010

This construction permit replaces all special conditions in Construction Permit 022010-001A and modifies limitations.

- Permit Condition 1 supersedes Special Conditions 1, and 2A through 2J from Construction Permit 1197-023.
- Special Condition 2 contains limits to VOC concentration, dilution ratio limits, and RTO requirements. It has been added to this permit.
- Special Condition 3 adds BACT requirements for the use of IPA for window/door cleanup. It has been added to this permit.
- Special Condition 4 adds limitations on hours of operation to some equipment and emission limitations on other equipment. It has been added to this permit.
- Special Condition 5 adds control and monitoring requirements for the RTO. It has been added to this permit.
- Special Condition 6 adds requirements for the paint booths. It has been added to this permit.
- Special Condition 7 adds initial compliance requirements for VOC capture, stack testing of the RTO, a time limit for initial compliance testing, and a requirement to stack test every 5 years. The initial compliance conditions have been added to this permit with modifications – while they have been met with stack testing done originally on May 12, 2010 (results showed that the RTO failed the 98% destruction efficiency but met outlet limit of under 20 ppm VOC maximum; 100% capture efficiency confirmed by Method 204 measurements), additional recordkeeping requirements have been included to maintain these records to show compliance; or the conditions were still included because they are relevant to the repeated stack testing required by Special Condition 7D. The most recent stack test done on May 13, 2015 shows the RTO reached a destruction efficiency of 98.05% and the RTO outlet VOC concentration was 16.0 ppm_v (wet) showing it passed with both forms of compliance. It assumed 100% capture efficiency.
- Special Condition 8 contains standards for submitting a proposed stack test plan and records of the testing. It has been added to this permit.
- Special Condition 9 includes standard reporting requirements. It has been added to this permit.
- Special Condition 10 includes requirements for taking VOC credit in the Emissions Inventory Questionnaire (EIQ).

Construction Permit 022010-001A, issued June 14, 2010

This amendment replaces all the special conditions of Construction Permit 022010-001 to change BACT limits on the RTO. Its conditions have been replaced with Construction Permit 022010-001B.

Construction Permit 032010-005, issued March 11, 2010

This construction permit adds a sulfuric acid/water anodizing tank and increases production of anodized windows.

- Special Condition 1 adds requirements for the sulfuric acid anodizing tank #4, particularly with requirements for the scrubber. It has been added to this permit.

Construction Permit 022010-001, issued February 5, 2010

This PSD construction permit was done in conformance with a settlement agreement between the Missouri Attorney General's Office, the Missouri Department of Natural Resources, and EFCO Corporation, finalized on April 5, 2009. This PSD permit also includes the installment of an off-line spray booth, cure oven, and small parts painting, which will all be controlled by the RTO. The conditions have been replaced by Construction Permit 022010-001B and its Attachment B by Construction Permit 022010-001C.

Construction Permit 012004-004, issued January 20, 2004

This construction permit is for the reconstruction of two paint booths that were originally destroyed by a fire in 1998.

- Special Condition 1 requires the installation to comply with 40 CFR Part 63, Subpart M. This condition has been met by this permit and thus this condition has not been included due to being redundant.
- Special Condition 2 requires the facility to maintain records for a minimum 5 years. This standard recordkeeping requirement has already been added to the permit and thus this redundant condition has not been added to this permit.

Construction Permit 052000-018, issued May 31, 2000

This construction permit is for a construction of a new adhesive spray booth to accommodate the application of adhesive to Styrofoam panels and aluminum sheet metal. This construction permit contains no special conditions.

Construction Permit 1199-004, issued November 5, 1999

This was a temporary construction permit to operate a portable grizzly that expired on March 1, 2000. This construction permit had no special conditions.

Construction Permit 1197-023, issued November 24, 1997

This construction permit is part of a remedial action required by the Air Pollution Control Program for equipment that was constructed before issuance of a construction permit. It additionally supersedes all special conditions from Construction Permit 0491-003. None of the special conditions have been added to this permit.

- Special Condition 1 limits the facility to 249 tons/yr VOC. It has been superseded by Construction Permit 022010-001B.
- Special Condition 2 contains limits on emission of several HAPs. It has been superseded by Construction Permit 022010-001B.
- Special Condition 3 requires production and emissions recordkeeping. It additionally has a requirement to limit the facility to under 250 tons/yr VOC. Since Condition 1 was superseded with it containing (essentially) the same condition as this condition, Special Condition 3 is assumed to be superseded with it. The recordkeeping requirements were not included because they were meant to show compliance with the limitations which have all been superseded. After consulting with the permit writer for Construction Permit 022010-001 and its amendments, it was agreed upon that this condition should have been superseded. Thus, this special condition was not included in this permit and the permittee no longer needs to comply with it.

- Special Condition 4 contains odor requirements which can be found in Section IV of this permit. This condition has not been included due to being redundant.
- Special Condition 5 contains standard reporting requirements. These general standards have already been added to this permit.

Construction Permit 0491-003, issued April 3, 1991

This construction permit is for the construction of a new paint spray facility which replaced an existing painting facility. The special conditions of this permit have been superseded by Construction Permit 1197-023.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart E – *Incinerators*

This subpart does not apply. The paint hanger burn-off oven (EP28) does not have a charging rate of more than 50 tons per day.

40 CFR Part 60, Subpart Dc – *Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart does not apply. All of the steam generating units are rated at less than 10 MMBtu/hr. While EP55 has a sum of 31.2 MMBtu/hr, individually each heating unit in this emission point is less than 10 MMBtu/hr.

40 CFR Part 60, Subpart Kb – *Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

This subpart does not apply. None of the tanks at this facility are larger than 75 m³.

40 CFR Part 60, Subpart S – *Primary Aluminum Reduction Plants*

This subpart does not apply. EFCO does not manufacture aluminum itself; it buys aluminum to use in its window manufacturing process.

40 CFR Part 60, Subpart CCCC – *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units*

This subpart does not apply. The waste burned in the paint hanger burn-off oven (EP28) does not meet the definition of solid waste as defined in 40 CFR 258.2.

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This subpart does not apply. This subpart applies to CI ICE that are model year 2007 and later or manufactured after April 1, 2006. EP70 was constructed October 2005, prior to these dates.

40 CFR Part 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

This subpart does not apply. The emergency engine is not spark-ignited or fueled by natural gas.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart N – *National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*

This subpart does not apply. EFCO does not meet the applicability requirements of this rule. This rule applies to chromium electroplating tanks or chromium anodizing tanks that perform hard chromium electroplating, decorative electroplating, or chromium anodizing. EFCO's tanks do not meet any of the definitions of this process. Chromium electroplating leaves the surface of the substrate with a thin layer of elemental chromium. Anodizing leaves the surfaces of the substrate with a layer of aluminum oxide. EFCO's process is a chemical conversion coating leaving a relatively soft layer of chromium phosphate on the surface of the aluminum. EFCO does not use an electrical current to electrodeposit chromium on the surface of aluminum.

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning*

This subpart does not apply. This subpart applies to cleaning solvents that contain methyl chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5), or chloroform (67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. None of the cleaning solvents used at EFCO contain these HAPs.

40 CFR Part 63, Subpart LL – *Hazardous Air Pollutants for Primary Aluminum Reduction Plants*

This subpart does not apply. EFCO does not manufacture aluminum itself; it buys aluminum to use in its window manufacturing process.

40 CFR Part 63, Subpart RRR – *National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production*

This subpart does not apply. EFCO does not meet the definition of secondary aluminum production facility. While EFCO uses secondary aluminum in its process it does not do any of the applicable activities listed under the definition of secondary aluminum production facility. EFCO only extrudes aluminum, which is excluded from applicability according to the definition.

40 CFR Part 63, Subpart MMMM – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

The facility is subject to this subpart and it has been incorporated into this permit. This subpart does not apply to EP49 Alum-A-Lub Usage or EP69 Aerosol Paint Usage because they do not meet the definition of coating operation.

The preamble to the proposed MACT MMMM regulations states that the purpose of this subpart is to focus on the regulation of organic HAP materials in surface coating operations. While it states that inorganic HAPs do exist as a component of surface coatings, most inorganic HAP components remain as solids in the dry coating film on the parts being coated or are deposited onto the walls, floor, and grates of spray booths in which they are applied, and are usually controlled with a control device. The preamble states that for applicable MACT MMMM emission sources, "inorganic HAP emissions are expected to be very low and have not been quantified". Thus, inorganic HAPs are not the intended target of MACT MMMM. Discussions with EPA Region 7 led to an agreement with this interpretation of the intentions of MACT MMMM and that it is likely that inorganic surface coatings and their ancillary processes may not be applicable sources under this subpart.

The chromator (EP-CME) and Paint Department Tanks are a part of cleaning and surface preparation operations. The Waste Water Tanks receive discharge from the Paint Department Tanks. The Paint Department Tanks, the Waste Water Tanks, and the chromator are not a part of any organic HAP surface coating operation; they utilize materials containing inorganic HAPs. The regulations of MACT MMMM restrict the emission of organic HAPs, not inorganic HAPs. While these emission sources do not meet any specific exemption listed in this subpart, because no applicable restrictions in this subpart apply to the tanks and the chromator, and due to the intentions of MACT MMMM in the preamble, this subpart is not considered applicable to these emission sources and thus has not been applied to them within this operating permit.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart applies to the emergency generator, EP70, and has been added to this permit.

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

This subpart applies and has been incorporated into the permit. EP55 Space Heaters, EP64 Air Makeup Unit, EP67 (EP-RTO) Regenerative Thermal Oxidizer, and the ovens are not subject due to not meeting the definition of a process heater.

40 CFR Part 63, Subpart NNNNNN – *Chemical Manufacturing Area Sources – Chromium Compounds*

This subpart does not apply. EFCO does not manufacture chromium compounds.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

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. While control devices are required on several emission points, their pre-controlled emissions are not over the major source threshold.

Greenhouse Gas Emissions

Note that this source is unlikely to be subject to the Greenhouse Gas Reporting Rule. The preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. The applicant is required to report the data directly to EPA if subject. The public may obtain CO₂ emissions data for applicable installations by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
While this rule applies, it is unlikely that particulate matter will emit beyond EFCO's property line in any significant quantities due to the nature and location of its emission points. As a result, the monitoring and recordkeeping requirements of this condition have been removed from the Core Permit Requirements.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
All natural gas-fueled equipment are exempt per 6.220(1)(L). The emergency engine is exempt per 6.220(1)(A). Some equipment only emits indoors and are exempt per 6.220(1)(O). While 10 CSR 10-6.220 applies to the other emission units of this facility, no visible emission are expected. The remaining emission points that contain vents to the outdoors contain low MHDRs and at max capacity are not expected to display visible emissions outside of the stack point. As a result, monitoring and recordkeeping requirements have been removed from the permit.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
This rule applies. This rule was rescinded from the Missouri Code of State Regulations on November 30, 2015 but is still in the EPA-approved SIP and is thus still an applicable federal requirement.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*
Natural gas-fueled units are exempt from this rule per 6.261(1)(A). This rule applies to the diesel-fueled emergency engine (EP70) and has been applied within this permit. Once 10 CSR 10-6.261 is incorporated into the SIP it will become a federal requirement.

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).

Response to Public Comments

Public comments were received from Leslye E. Werner of EPA Region 7 on October 30, 2017. The comments are addressed in the order in which they appear within the letter.

EPA Comment #1:

Permit Condition 003 incorporates special conditions from Permit to Construct #022010-001B, issued December 14, 2010, as applicable to: two (2) Automatic Primer Spray Booths (Emission Points EP12 and EP13); Primer Flash-off (Emission Point EP14); two (2) Automatic Topcoat Spray Booths (Emission Points EP15 and EP16); six (6) Manual Topcoat Spray Booths (Emission Points EP17, EP18, EP20, EP21, EP22, and EP23); Topcoat Flash-off (Emission Point EP19); Final Flash-off (Emission Point EP24); Natural Gas-fired Paint Curing Oven (Emission Point EP25); Manual Off-line Paint Spray Booth (Emission Point EP65) and Natural Gas-fired Off-line Paint Oven (Emission Point EP66). Permit Condition 003 limits the emissions of hexavalent chromium from all sixteen (16) of these painting operation emission points to no more than 33.73 pounds of hexavalent chromium in any consecutive 12-month period. Permit Condition 003 also requires the permittee to use Attachment B, or equivalent, to demonstrate compliance. Attachment B requires the permittee to determine the total Cr VI emissions from the painting operations (all sixteen (16) emission points) by totaling the amount of Cr VI used in paint or primer each month and multiplying the total by a transfer efficiency of 75% followed by multiplying by a combined filter control efficiency of 99.7%. EPA has several suggestions they would like MDNR to consider, relative to Attachment B:

1. Column 2 requires the permittee to total the amount of paint *or* (emphasis added) primer and, based on review of Permit to Construct #022010-001B, the permittee should be determining the Cr VI emissions of both the paint and primer;
2. Column 3 provides a single transfer efficiency of 75%; yet footnote 10 states the "transfer efficiency only from the use of electrostatic turbo bell guns. If other types of spray guns are used, the permittee shall contact the New Source Review Unit of the Air Pollution Control Program for approval of transfer efficiencies." According to the list of emission points, only EP12, EP13, EP15, and EP16 use electrostatic turbo bell guns. Therefore, all of the remaining emission points should be using a different transfer efficiency, approved by MDNR. Also, Attachment F identifies a transfer efficiency of 65% for EP17 and 15% for EP18, EP19, EP20, EP21, EP22, EP23, and EP65. Therefore, it appears to EPA that the permittee is under counting their Cr VI emissions from the painting operations.
3. Column 4 provides a single combined filter efficiency of 99.7% where Attachment F shows a combined filter control efficiency of 99%. Again, it would appear that the permittee is undercounting their Cr VI emissions.
4. Neither the transfer efficiency(ies) nor the combined filter control efficiency(ies) are referenced as to the source of these critical compliance determination values.

Additionally, the Table of Updated Potential to Emit for the Installation, in the Statement of Basis, includes footnote 16. Footnote 16 says "Transfer efficiency of 75% was *assumed* (emphasis added) for booths with electrostatic turbo bells, 65% for electrostatic manual guns and 15% for manual guns." As stated above, Attachment B does not indicate the use of variable transfer efficiencies and the use of assumed transfer efficiencies is not practically enforceable.

MoDNR Response #1:

1. Column 2 of Attachment B has been updated replacing “or” with “and”. Cr VI tracking should include both paint and primer.
2. Construction Permit 022010-001C states that coatings containing Cr VI are only used in paint booths using electrostatic turbo bell spray guns, which has been given a transfer efficiency of 75%, hence why no other transfer efficiency is reflected in Attachment B. However, MoDNR notes that use of electrostatic turbo bell spray guns with Cr VI-containing coatings should be enforced. Thus, Permit Condition 004 and Attachment B have been updated accordingly.
3. Column 4 of Attachment B has been updated to an efficiency of 99%. While construction permit 02010-001C states the efficiency of the combined filters is 99.7%, this operating permit only requires the upkeep of RTO filter, not each individual paint filter. As a result, the combined filter efficiency should not be used.
4. Footnote 17 (previously Footnote 16), has been updated stating the sources of the transfer efficiencies and control efficiencies.

As described in #2 of this response, the electrostatic turbo bell spray guns are the only gun taken in account for the required monitoring/recordkeeping in Attachment B for the associated Cr VI limit. The other spray guns are not associated with any emission limit that takes in account the transfer efficiencies for compliance. As a result, MoDNR finds the transfer efficiencies of the other spray guns simply serve as appropriate for PTE-estimating purposes and do not need to be enforced in this operating permit.

EPA Comment #2:

Permit Condition 011 incorporates the requirements from 10 CSR 10-6.260 to emission unit EP70, Back-up emergency generator. MDNR notes that this is a "Federal Only requirement," yet, since 10 CSR 10-6.260 continues to be a requirement of the approved Missouri State Implementation Plan, it remains a MDNR enforceable requirement and therefore the "Federal Only requirement" notation should be removed.

MoDNR Response #2:

The “Federal Only requirement” notation has been removed from Permit Condition 011.

EPA Comment #3:

Section IV: Core Permit Requirements includes 10 CSR 10-6.250: Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements incorporating the Asbestos Hazard Emergency Response Act (AHERA) and its regulations for school districts and personnel working on asbestos activities in schools. The requirements associated with 10 CSR 10-6.250 have not been adopted into the EPA approved Missouri State Implementation Plan (SIP) and is therefore a "State Only Requirement," and EPA recommends MDNR consider adding a "State Only Requirement" designation to 10 CSR 10-6.250.

MoDNR Response #3:

A “State Only Requirement” designation has been added to 10 CSR 10-6.250.

EPA Comment #4:

Permit Condition 002 incorporates special conditions from Permit to Construct #022010-001, issued December 14, 2010, applicable to Chromator-Acid Spray Cleaner and Chromator-Spray Chromate Phosphate (Emission Point EP-CME). Permit Condition 002 requires the permittee to Attachment A (Compliance Worksheet for Cr VI Emissions from the Chromator (EP-CME)), or equivalent form to

demonstrate compliance with the 1.14 pounds of hexavalent chromium from the Chromator (EP-CME) in any consecutive 12-month period. Attachment A relies on an unreferenced Cr VI emission factor of 0.00157 lb/hr. The use of an unreferenced emission factor could bring into question the practical enforceability of Attachment A. To enhance the enforceability of Attachment A, EPA suggests MDNR consider including a reference to the source of the Cr VI emission factor.

MoDNR Response #4:

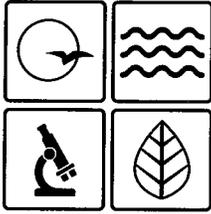
The source of the Cr VI emission factor has been added to Attachment A.

EPA Comment #5:

Permit Condition 001 incorporates special conditions from Permit to Construct #022010-001B, issued December 14, 2010, applicable to one hundred twenty (120) natural gas-fired space heaters (Emission Point EP55) and a natural gas-fired Air Makeup Unit (Emission Point EP64). Permit Condition 001 establishes annual hours of operating limitations on these two emission points and Permit Condition 001 allows the permittee to use the most current Emissions Inventory Questionnaire (EIQ) for compliance verification. EPA suggests MDNR consider requiring the permittee to include the most recent EIQ with any compliance reports they submit to facilitate agency verification of compliance.

MoDNR Response #5:

MoDNR keeps copies of the EIQ submittals in their database that can be easily accessed by the agency to verify compliance with Permit Condition 001. MoDNR considers additional submittals of EIQ copies as an unnecessary and excessive paper submittal exercise. As a result, MoDNR considers the current compliance verification method satisfactory.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

DEC 08 2017

Mr. Douglas Dieleman
EFCO Corporation
1000 County Road
Monett, MO 65708

Re: EFCO Corporation, 009-0003
Permit Number: OP2017-092

Dear Mr. Dieleman:

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

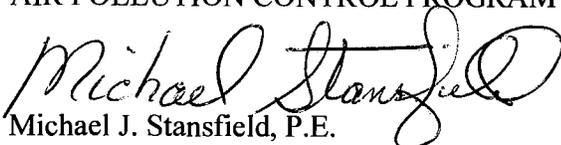
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS:kwj

Enclosures

c: PAMS File: 2011-04-001

