

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **012013-004** Project Number: 2011-12-073

Installation Number: 173-0043

Parent Company: Hannibal Industrial Painting, Inc.

Parent Company Address: 1330 New London Gravel Rd, Hannibal, MO 63401

Installation Name: Hannibal Industrial Painting, Inc.

Installation Address: 1330 New London Gravel Rd, Hannibal, MO 63401

Location Information: Ralls County, S1, T56N, R5W

Application for Authority to Construct was made for:
 Refinishing of semi truck, trailer frames and bodies, and various other products through sandblasting, priming, topcoating, and solvent recycling. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

IAN 07 2013

EFFECTIVE DATE

Kyra L. Moore
 DIRECTOR OR DESIGNEE
 DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

You must notify the Department's Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of these air contaminant sources.

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

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

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

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

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SPECIAL CONDITIONS:

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

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

Hannibal Industrial Painting, Inc.
Ralls County, S1, T56N, R5W

1. Control Device Requirement – Surface Coating Booths and Filters
 - A. Hannibal Industrial Painting, Inc. shall control emissions from the surface coating spray guns (EU-04 and EU-05) using booths/buildings and mat/panel exhaust filters.
 - B. Each booth/building shall be completely enclosed (doors and windows closed) while spray surface coating occurs. Exhaust fan(s) shall be operating.
 - C. The filters shall be operated and maintained in accordance with the manufacturer's specifications, which shall be kept on site.
 - D. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - E. Hannibal Industrial Painting, Inc. shall maintain an operating and maintenance log for the filters which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. Control Device Requirement – Abrasive Blasting
 - A. Hannibal Industrial Painting, Inc. shall control emissions from the abrasive blasting (EU-03) using a building and mat/panel exhaust filters.
 - B. The building shall be enclosed (doors and windows closed) while abrasive blasting occurs. Exhaust fan(s) shall be operating.

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SPECIAL CONDITIONS:

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

- C. The filters shall be operated and maintained in accordance with the manufacturer's specifications, which shall be kept on site.
 - D. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - E. Hannibal Industrial Painting, Inc. shall maintain an operating and maintenance log for the filters which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. Use of Alternative Coating in the Surface Coating Spray Guns (EU-04 and EU-05)
- A. When considering using an alternative coating in the spray guns that differs from a material listed in the Application for Authority to Construct, Hannibal Industrial Painting, Inc. shall calculate the potential emissions of all individual hazardous air pollutants (HAPs) and total volatile organic compound (VOC) in the alternative material.
 - B. Hannibal Industrial Painting, Inc. shall seek approval from the Air Pollution Control Program before use of the alternative material if the potential individual HAP emissions for the alternative material are equal to or greater than the screening model action level (SMAL) for any chemical listed in Appendix A, or if the total VOC potential emissions exceed 75.87 tons per year.
 - C. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to show compliance with Special Condition 3.A.
4. Operational Requirement – Coating/Solvent
- Hannibal Industrial Painting, Inc. shall keep the coatings and solvents in sealed containers whenever the materials are not in use. Hannibal Industrial Painting, Inc. shall provide and maintain suitable, easily read, permanent markings on all coating and solvent containers at the installation.

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SPECIAL CONDITIONS:

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

5. Record Keeping and Reporting Requirements
 - A. Hannibal Industrial Painting, Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
 - B. Hannibal Industrial Painting, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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

Project Number: 2011-12-073
Installation ID Number: 173-0043
Permit Number:

Hannibal Industrial Painting, Inc.
1330 New London Gravel Rd
Hannibal, MO 63401

Complete: December 29, 2011

Parent Company:
Hannibal Industrial Painting, Inc.
1330 New London Gravel Rd
Hannibal, MO 63401

Ralls County, S1, T56N, R5W

REVIEW SUMMARY

- Hannibal Industrial Painting, Inc. has applied for authority to refinish semi truck and trailer frames and bodies, and various other products through sandblasting, priming, topcoating, and solvent recycling.
- HAP emissions are expected from the priming, topcoating, and solvent recycling. HAPs from the coatings and solvent submitted with the application include ethylbenzene (chemical abstracts service (CAS) 100-41-4), mixed isomer xylenes (CAS 1330-20-7), methanol (CAS 67-56-1), toluene (CAS 108-88-3), and ethylene glycol monobutyl ether acetate (CAS 112-07-2).
- None of the New Source Performance Standards (NSPS) under 40 CFR 60 apply to the installation.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) under 40 CFR 61 apply to this installation.
- 40 CFR 63 Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* applies to the mobile equipment spray-applied surface coating refinishing installation. However, the coatings submitted in the permit application do not contain target HAPs. Per §63.11170(a)(2) the applicant may petition the administrator (EPA Region 7) for an exemption.
- An enclosed booth and a mat/panel fiberglass filter are being used to control the particulate matter (PM), particulate matter less than 10 microns in diameter (PM₁₀), and particulate matter less than 2.5 microns in diameter (PM_{2.5}) coating overspray emissions from each spray gun in this permit. Abrasive blasting emissions are controlled in a similar manner.

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential volatile organic compound (VOC) and emissions are at minor source levels. Potential HAP emissions are at area sources levels. Potential emissions of all other pollutants are below respective de minimis levels.
- This installation is located in Ralls County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- Emissions testing is not required for the equipment.
- Submittal of a basic operating permit application is required for this installation within 30 days of this permit's issuance date.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Hannibal Industrial Painting, Inc. is a painting contractor located in Hannibal. It is operating. No permits have been issued to the installation from the Air Pollution Control Program. Semi truck, trailer frames and bodies (mobile equipment), and various other products are refinished through sandblasting, priming, topcoating, and solvent recycling.

The abrasive media is river sand, which is delivered by truck and received pneumatically (EU-01) to an elevated bin. The pneumatic transfer is not equipped with a control device. Sand is transferred by gravity (EU-02) to the blasting pump/compressor. The maximum hourly design rate (MHDR) of the blasting (EU-03) was calculated by dividing the amount of sand needed to blast a transport trailer by the job time. Up to 1,800 pounds of sand are used in eight hours, or 225 pounds per hour. Previously blasting occurred outside with no control devices. Mobile equipment blasting occurs at other installations frequently with enclosure and exhaust filtration, therefore its emissions are not fugitive. Uncontrolled blasting at this installation does not comply with 10 CSR 10-6.400. Therefore, blasting will now occur in a building with filtered exhaust.

The installation has two 40 feet by 80 feet enclosed buildings used as paint booths. Primer MHDR was calculated using the amount of primer applied divided by the total job time including setup and cleanup. Up to six gallons of mixed two part epoxy primer and thinner is applied in seven hours. All primed substrates dry overnight (assumed 12 hours) before being topcoated. Therefore, the primer MHDR is six gallons

conservatively divided by 12 hours, multiplied by two booths, or one gallon of mixed primer per hour. The primer base submitted in the application is Bar-Rust 235 DC235B1642. The hardener is Bar-Rust 235 HB0980. The thinner is Superior Oil Company #10. According to the primer manufacturer, the mixing ratio is four parts base to one part hardener. Thinner is used at 1 part base to 1/10 part thinner. Using the mixing ratios and individual product densities, the maximum application rate of the base, hardener, and thinner is 8.84, 1.45, and 0.51 pounds per hour respectively.

Topcoat MHDR was calculated as submitted in the permit application, without activator or thinner. Up to 5 gallons of Dupont Imron 333M24861 polyurethane enamel is applied in seven hours including setup and cleanup. Dry to touch/curing time was assumed at 12 hours. Therefore total topcoat MHDR for two booths is 0.833 gallons per hour; with the product density the MHDR is 9.2 pounds per hour. Priming and topcoating are each performed with airless spray guns. Transfer efficiency of 41 percent was assigned according to the average of results in *Development of Proposed Standard Test Method for Spray Painting Transfer Efficiency, Volume II, Verification Program*, EPA-600/2-88-026b, April 1988.

The installation also operates a Uniram solvent recycler (EU-06), model URS500. Five gallon batches of used solvent can be distilled by electric heating in as little as four hours. The MHDR is 1.25 gallons per hour. The distillation tank is enclosed, however the reclaimed solvent container is not sealed.

EMISSIONS/CONTROLS EVALUATION

Sand receiving potential emissions were calculated using the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 11.12, *Concrete Batching*, June 2006. The emission factors for SCC 3-05-011-07 for uncontrolled cement unloading to elevated storage silo (pneumatic) were selected. These emission factors are conservative for the process as cement is much finer than sand.

Sand transfer potential emissions were calculated using AP-42 Section 13.2.4, *Aggregate Handling and Storage Piles*, November 2006. Wind speed of 9.7 miles per hour and sand moisture content of 4.17 percent were selected. Wind speed is cited from Quincy, Illinois which is the closest reporting station. The sand moisture content is cited from AP-42 Section 11.12.

Potential emissions of PM, PM₁₀, and PM_{2.5} from sandblasting were calculated using AP-42 Section 13.2.6, *Abrasive Blasting*, October 1997, SCC 3-09-009-02. The PM emission factor for five mile per hour winds was selected, 27 pounds per 1,000 pounds of abrasive. Five miles per hour is the lowest of the available range. The PM₁₀ and PM_{2.5} emission factors are 13 and 1.3 pounds per 1,000 pounds of abrasive, respectively. The controlled emission factor was not selected as the blasting is not controlled with a fabric filter, but rather mat or panel filters. The enclosure is not air tight and was assigned 80 percent capture efficiency. The filter was assigned a PM_{2.5} control efficiency of 92 percent, obtained from Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Table

B.2-3, AIRS Code 058, mat or panel filter. Particulate matter HAP emissions were not considered.

Potential emissions of each pollutant from surface coating were calculated using the respective product material safety data sheet (MSDS) ingredient maximum weight percent. The buildings/paint booths were assigned 100 percent capture efficiency with the doors closed and exhaust fan operating. Primer and paint overspray particulate matter emissions were conservatively assumed to be PM_{2.5}. The mat/panel fiberglass filter manufacturer has assigned an average removal efficiency of 99.38%, citing a 40 CFR Part 63 emission standard. However, without knowing the tested particle size distribution, the filter was conservatively assigned a PM_{2.5} control efficiency of 92 percent, as previously cited. Volatile organic compound (VOC) and volatile HAP emissions were calculated assuming all those sprayed as being emitted.

Potential emissions from the solvent recycler were calculated using AP-42 Section 4.7, *Waste Solvent Reclamation*, February 1980. The emission factor for loading was selected, 0.72 pounds of VOC per ton of solvent, but conservatively applied as 0.72 pounds of solvent emitted per ton of solvent. Individual HAP emissions were calculated using the solvent density and respective HAP weight percentages, multiplied by the emission factor.

Potential emissions of the project are represented by the potentials of the entire installation, assuming continuous operation (8,760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (EIQ)	Uncontrolled Potential Emissions of the Installation	Conditioned Potential Emissions of the Installation
PM	25.0	N/A	N/A	51.41	9.37
PM ₁₀	15.0	N/A	N/A	37.46	5.58
PM _{2.5}	10.0	N/A	N/A	25.78	2.38
SO _x	40.0	N/A	N/A	N/A	N/A
NO _x	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	75.87	75.87
CO	100.0	N/A	N/A	N/A	N/A
Combined HAPs	25.0	N/A	N/A	9.76	9.76
Ethylbenzene	10.0	N/A	N/A	0.43	0.43
Xylenes	10.0	N/A	N/A	3.87	3.87
Methanol	10.0	N/A	N/A	0.90	0.90
Toluene	10.0	N/A	N/A	0.90	0.90
2-Butoxyethanol acetate	¹ 5.0	N/A	N/A	3.67	3.67

N/A = Not Applicable; N/D = Not Determined

¹ Five tons per year is the screening model action level (SMAL).

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential VOC emissions are at minor source levels. Potential HAP emissions are at area sources levels. Potential emissions of all other pollutants are below respective de minimis levels.

APPLICABLE REQUIREMENTS

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

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400. This regulation applies to the sand receiving, transfer, and blasting. All three emission units are in compliance.
- *Maximum Achievable Control Technology (MACT) Regulations*, 10 CSR 10-6.075, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, 40 CFR Part 63, Subpart HHHHHH.

STAFF RECOMMENDATION

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

David Little
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated December 21, 2011, received December 29, 2011, designating Hannibal Industrial Painting, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

Attachment A – Alternative Coating Potential to Emit Compliance Worksheet

Hannibal Industrial Painting, Inc.
 Ralls County, S1, T56N, R5W
 Project Number: 2011-12-073
 Installation ID Number: 173-0043
 Permit Number:

This sheet covers the coating or material name _____ Date _____ Copy this sheet as needed.

¹ Process	² Individual HAP Name and CAS No.	² HAP is also Particulate Matter (yes / no)	² Individual HAP Content (maximum weight %)	² VOC Content (pounds per gallon)	² Product Weight (pounds per gallon)	³ Maximum Hourly Design Rate (gallons per hour)	⁴ Individual HAP PTE (tons per year)	⁵ Individual HAP SMAL (tons per year)	⁶ Total VOC Emissions (tons per year)
<i>example priming base part A</i>	<i>Benzene 71-43-2</i>	<i>no</i>	<i>20.0</i>	<i>7.0</i>	<i>9.8</i>	<i>1.0</i>	<i>8.58</i>	<i>2.0</i>	46.43
<i>example priming base part B</i>	<i>Cobalt 2-Ethylhexanoate 136-52-7</i>	<i>yes</i>	<i>1.3</i>	<i>3.6</i>	<i>9.8</i>	<i>1.0</i>	<i>0.026</i>	<i>0.1</i>	

- Record the process type (priming base, priming hardener, thinner, activator, topcoat, clearcoat, etc.).
- This information is reported on the respective coating’s MSDS. Compare each ingredient on the MSDS against the chemical names listed in Appendix A for verification as a HAP. Multiply specific gravity by 8.34 to obtain product weight.
- The Maximum Hourly Design Rate (MHDR) of the airless spray gun is 1 gallon per hour while priming, and 0.83 gallons per hour while topcoating. Determine the gallons per hour of each mixed coating part (base, hardener, thinner, activator) by multiplying the MHDR and mixing ratio.
- Individual HAP PTE calculated by multiplying the Individual HAP Content, Product Weight, MHDR, and 4.38. Divide the result by 100. If the HAP is also particulate matter (see Appendix A) then multiply the Individual HAP Content, Product Weight, MHDR, and 4.38; to account for transfer and control efficiency multiply the result by 0.000472.
- Individual HAP SMAL as reported in Appendix A. If the Individual HAP PTE is equal to or greater than the Individual HAP SMAL, seek approval from the Air Pollution Control Program before using this coating.
- Total VOC Emissions calculated by multiplying the individual VOC content by the respective MHDR by 4.38. Sum the individual VOC emissions. If the total VOC emissions exceed 75.87 tons per year, seek approval from the Air Pollution Control Program before using this coating.

Appendix A: Table of Hazardous Air Pollutants and Screening Model Action Levels (May 3, 2012 Revision 10)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CARBARYL	63-25-2	10	V	Y	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
ACETOPHENONE	98-86-2	1		Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CATECHOL	120-80-9	5		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
ACROLEIN	107-02-8	0.04		Y	N	CHLORAMBEN	133-90-4	1		Y	Y	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
ACRYLAMIDE	79-06-1	0.02		Y	N	CHLORDANE	57-74-9	0.01		Y	Y	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
ACRYLIC ACID	79-10-7	0.6		Y	N	CHLORINE	7782-50-5	0.1		N	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
ACRYLONITRILE	107-13-1	0.3		Y	N	CHLOROACETIC ACID	79-11-8	0.1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
AMINOBIHENYL, [4-]	92-67-1	1	V	Y	N	CHLOROBENZENE	108-90-7	10		Y	N	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
ANILINE	62-53-3	1		Y	N	CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	DIMETHYL PHTHALATE	131-11-3	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLOROFORM	67-66-3	0.9		Y	N	DIMETHYL SULFATE	77-78-1	0.1		Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
ANTIMONY COMPOUNDS		5	H	N	Y	CHLOROPRENE	126-99-8	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHROMIUM COMPOUNDS		5	L	N	Y	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	CHRYSENE	218-01-9	0.01	V	Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	COBALT COMPOUNDS		0.1	M	N	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
ASBESTOS	1332-21-4	0	A	N	Y	CRESOL, [META-]	108-39-4	1	B	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
BENZENE	71-43-2	2		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
BENZIDINE	92-87-5	0.0003	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CUMENE	98-82-8	10		Y	N	ETHYL ACRYLATE	140-88-5	1		Y	N
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N	ETHYL BENZENE	100-41-4	10		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y	ETHYL CHLORIDE	75-00-3	10		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N	ETHYLENE GLYCOL	107-21-1	10		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2				
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DIAZOMETHANE	334-88-3	1		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N
BERYLLIUM SALTS		2E-05	J	N	Y	DBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DIOXINS/FURANS		6E-07	D,V	Y	N	ETHYLENE OXIDE	75-21-8	0.1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DBENZOFURAN	132-64-9	5	V	Y	N	ETHYLENE THIOUREA	96-45-7	0.6		Y	Y
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	FORMALDEHYDE	50-00-0	2		Y	N
BROMOFORM	75-25-2	10		Y	N	DBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N
BROMOMETHANE	74-83-9	10		Y	N	DBUTYL PHTHALATE	84-74-2	10		Y	Y	GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	HEPTACHLOR	76-44-8	0.02		Y	N
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y	HEXACHLOROBENZENE	118-74-1	0.01		Y	N
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DICHLOROETHYLENE, [1,2-]	107-06-2	0.8		Y	N	HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N
CAPROLACTAM (Delisted)	105-60-2					DICHLOROMETHANE	75-09-2	10		N	N	HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N
CAPTAN	133-06-2	10		Y	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N

Appendix A: Table of Hazardous Air Pollutants and Screening Model Action Levels (May 3, 2012 Revision 10)

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	NITROSODIMETHYLAMINE, [N-]	82-75-9	0.001		Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	NITROSOMORPHOLINE, [N-]	58-93-2	1		Y	N	URETHANE [ETHYL CARBAMATE]	51-79-8	0.8		Y	N
HEXAMETHYLENE-1,6-DIISOCYANATE	822-06-0	0.02		Y	N	NITROSO-N-METHYLUREA, [N-]	88-93-5	0.0002		Y	N	VINYLACETATE	108-05-4	1		Y	N
HEXAMETHYLPHOSPHORAMIDE	880-31-9	0.01		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N	VINYLBROMIDE	593-80-2	0.6		Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PARATHION	56-38-2	0.1		Y	Y	VINYLCHLORIDE	75-01-4	0.2		Y	N
HYDRAZINE	302-01-2	0.004		N	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y	XYLENE, [META-]	108-38-3	10	G	Y	N
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PENTACHLORONITROBENZENE	82-88-8	0.3		Y	N	XYLENE, [ORTHO-]	95-47-8	10	G	Y	N
HYDROGEN FLUORIDE	7664-38-3	0.1		N	N	PENTACHLOROPHENOL	87-98-5	0.7		Y	N	XYLENE, [PARA-]	106-42-3	10	G	Y	N
HYDROQUINONE	123-31-9	1		Y	N	PHENOL	108-95-2	0.1		Y	N	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N
INDENO(1,2,3-CD)PYRENE	193-39-5	0.01	V	Y	N	PHENYLENEDIAMINE, [PARA-]	106-60-3	10		Y	N						
ISOPHORONE	78-59-1	10		Y	N	PHOSGENE	75-44-5	0.1		Y	N						
LEAD COMPOUNDS		0.01	Q	N	Y	PHOSPHINE	7803-51-2	5		N	N						
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-99-9	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N						
MALEIC ANHYDRIDE	108-31-6	1		Y	N	PHthalic ANHYDRIDE	85-44-9	5		Y	N						
MANGANESE COMPOUNDS		0.8	R	N	Y	POLYCYCLIC ORGANIC MATTER		0.01	V	Y	N						
MERCURY COMPOUNDS		0.01	S	N	N	PROPANE SULFONE, [1,3-]	1120-71-4	0.03		Y	Y						
METHANOL	67-56-1	10		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N						
METHOXYCHLOR	72-43-6	10	V	Y	Y	PROPIONALDEHYDE	123-28-6	5		Y	N						
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	PROPOXUR [BAYGON]	11426-1	10		Y	Y						
METHYL CHLORIDE	74-87-3	10		Y	N	PROPYLENE OXIDE	75-56-8	5		Y	N						
METHYLETHYL KETONE (Delisted)	78-93-3					PROPYLENEMINE, [1,2-]	75-56-8	0.003		Y	N						
METHYL HYDRAZINE	60-34-4	0.06		Y	N	QUINOLINE	91-22-5	0.006		Y	N						
METHYL IODIDE	74-93-4	1		Y	N	QUINONE	108-51-4	5		Y	N						
METHYLISOBUTYL KETONE	108-10-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y						
METHYLISOCYANATE	624-93-9	0.1		Y	N	SELENIUM COMPOUNDS		0.1	W	N	Y						
METHYLMETHACRYLATE	80-82-6	10		Y	N	STYRENE	100-42-5	1		Y	N						
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	STYRENE OXIDE	96-09-3	1		Y	N						
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN, [2,3,7,8]	1746-01-6	6E-07	D, V	Y	Y						
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TETRACHLOROETHANE, [1,1,2,2-]	78-34-5	0.3		Y	N						
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N						
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N						
MINERAL FIBERS		0	T	N	Y	TOLUENE	108-88-3	10		Y	N						
NAPHTHALENE	91-20-3	10	V	Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-94-9	0.1		Y	N						
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N						
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	TOXAPHENE	8001-35-2	0.01		Y	N						
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	TRICHLOROBE NZE NE, [1,2,4-]	120-82-1	10		Y	N						
NICKEL COMPOUNDS		1	U	N	Y	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N						
NICKEL REFINERY DUST		0.08	U	N	Y	TRICHLOROETHANE, [1,1,2-]	78-00-5	1		Y	N						
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y	TRICHLOROETHYLENE	78-01-6	10		Y	N						
NITROBENZENE	98-95-3	1		Y	N	TRICHLOROPHENOL, [2,4,6-]	95-95-4	1		Y	N						
NITROBIPHENYL, [4-]	82-93-3	1	V	Y	N	TRICHLOROPHENOL, [2,4,6]	88-05-2	6		Y	N						
NITROPHENOL, [4-]	100-02-7	5		Y	N	TRIMETHYLAMINE	121-44-8	10		Y	N						
NITROPROPANE, [2-]	78-46-9	1		Y	N	TRIFLURALIN	1582-09-8	9		Y	Y						

Legend

Group ID	Aggregate Group Name
A	Asbestos
B	Cresols/Cresylic Acid (isomers and mixtures)
C	2,4 - D, Salts and Esters
D	Dibenzofurans, Dibenzodioxins
E	4,6 Dinitro-o-cresol, and Salts
F	Lindane (all isomers)
G	Xylenes (all isomers and mixtures)
H	Antimony Compounds
I	Arsenic Compounds
J	Beryllium Compounds
K	Cadmium Compounds
L	Chromium Compounds
M	Cobalt Compounds
N	Coke Oven Emissions
O	Cyanide Compounds
P	Glycol Ethers
Q	Lead Compounds (except elemental Lead)
R	Manganese Compounds
S	Mercury Compounds
T	Fine Mineral Fibers
U	Nickel Compounds
V	Polycyclic Organic Matter
W	Selenium Compounds
X	Polychlorinated Biphenyls (Aroclors)
Y	Radionuclides

Notes

Note 1	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million.
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Ms. Debra Bush
Secretary
Hannibal Industrial Painting, Inc.
1330 New London Gravel Rd
Hannibal, MO 63401

RE: New Source Review Permit - Project Number: 2011-12-073

Dear Ms. Bush:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:dll

Enclosures

c: Northeast Regional Office
PAMS File: 2011-12-073

Permit Number: