



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2016-043
Expiration Date: DEC 15 2021
Installation ID: 071-0173
Project Number: 2011-10-021

Installation Name and Address

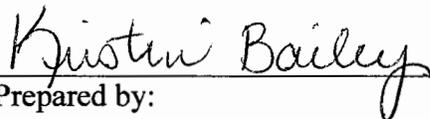
Henniges Automotive
101 Danny Scott Drive
New Haven, MO 63068
Franklin County

Parent Company's Name and Address

Henniges Automotive
2750 High Meadow Circle
Auburn Hills, MI 48326

Installation Description:

Henniges Automotive manufactures automotive sealing and anti-vibration products. The installation is a synthetic minor source of Hazardous Air Pollutants (HAP) and a synthetic minor source of Volatile Organic Compounds (VOC). The installation is located in Franklin County and is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. Process operations include rubber and thermoplastic vulcanizate extrusion, curing ovens, adhesive application, surface coating, and presses.



Prepared by:
Kristin Bailey
Operating Permit Unit



Director or Designee
Department of Natural Resources

DEC 15 2016

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 which emits air pollutants and identified as having unit-specific emission limitations. These units are also subject to all plant wide limitations.

Emission Unit #	Description of Emission Unit
CB K2Xa	K2XX Primaries Primer Booths, Construction Permit 05012-015, issued May 22, 2012
CB K2Xb	K2XX Primaries Topcoat, Construction Permit 05012-015, issued May 22, 2012
CB4	Coating: Water-base, Construction Permit 072001-015, issued July 18, 2001
CB9	Coating Application, Construction Permit 072001-015, issued July 18, 2001
CF-1	Adhesive Application, Corner Flocker, Construction Permit 1298-007, issued December 14, 1998
CF-2	Adhesive Application, Corner Flocker, Construction Permit 1298-007, issued December 14, 1998
E1-01	Hot Air Curing Oven for Rubber, Natural Gas Combustion, Construction Permit 0899-005, issued August 9, 1999
E1-02	Line 1 2 nd Hot Air Curing Oven
E1-FB	Water Based Coating booth
E1-CB2	Extrusion Line 1 Coating Booth 2, Construction Permit 092011-005, issued September 23, 2011
E1-X	Rubber Extruder, Construction Permit 0899-005, issued August 9, 1999
E2-02	Electric Curing Oven for TPV
E2-FB	Adhesive Application, Flock Booth, Construction Permit 052002-005, issued April 3, 2002
E2-X	TPV Extruder, Construction Permit 052002-005, issued April 3, 2002
E5-FB	Flock application from E5-FB moved to Line 3.
E4-01	Hot Air Curing Oven for Rubber, Natural Gas Combustion, Construction Permit 092002-008, issued September 11, 2002
E4-CB1	Coating: Water-base, Construction Permit 092002-008, issued September 11, 2002
E4-CB2	Coating Booth, Construction Permit 072001-015, issued July 18, 2001
E4-FB	Adhesive Application, Flock Booth, Construction Permit 092002-008, issued September 11, 2002
E4-X	Extruding rubber, Construction Permit 092002-008, issued September 11, 2002
E5-01	Hot Air Curing Oven for rubber, Natural Gas Combustion, Construction Permit 0899-005, issued August 9, 1999
E5-CB	Spray Coating Booth, Construction Permit 072001-015, issued July 18, 2001
E5-X	Rubber Extruder, Construction Permit 0899-005, issued August 9, 1999
E6-01	Line 6 Hot Air Curing Oven, Natural Gas Combustion, Construction Permit 05012-015, issued May 22, 2012

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
E6-CB 1	Extrusion Line 6 Coating Booth 1, Construction Permit 05012-015, issued May 22, 2012
E6-CB 2	Extrusion Line 6 Coating Booth 2, Construction Permit 05012-015, issued May 22, 2012
E6-X	Extrusion, Construction Permit 05012-015, issued May 22, 2012
E8-X	TPV Extruder , Construction Permit 052004-017, issued May 12, 2004
SE3-01	Hot Air Rubber Curing Process, Construction Permit 072001-015, issued July 18, 2001
SE3-CB	Line 3 Coating Booth, Construction Permit 072001-015, issued July 18, 2001
SE3-X	Rubber Extruder, Construction Permit 072001-015, issued July 18, 2001
SE7-01	Salt rubber curing process, Construction Permit 0899-005, issued August 9, 1999
SE7-CB	Coating: Water-base, Construction Permit 072001-015, issued July 18, 2001
SE7-IR	Infrared rubber curing process, Construction Permit 072001-015, issued July 18, 2001
SE7-X	Rubber Extruder, Construction Permit 0899-005, issued August 9, 1999
PRESSES	Presses, Construction Permit 05012-015, issued May 22, 2012

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. These units are also subject to all plant wide limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
CLN	Clean-up, Construction Permit 122000-002, issued December 6, 2000
Mold Prote	Manual Application of Mold Release
E1-MW	Line 1 Microwave Oven
CB-6a	Primer Spray Booth
CB-7a	Coating Spray Booth

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. 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 052012-015, Issued May 22, 2012

Emission Limitation:

- 1) The permittee shall emit into the atmosphere less than 100.0 tons of volatile organic compounds (VOCs) from the entire installation in any consecutive 12-month period. [Special Condition 2A]
- 2) The permittee shall emit less than ten tons of any individual hazardous air pollutant (HAP) into the atmosphere from the entire installation during any consecutive 12-month period. [Special Condition 2B]
- 3) The permittee shall discharge less than 25 tons of hazardous air pollutants (HAPs) in aggregate into the atmosphere from the entire installation during any consecutive 12-month period. [Special Condition 2B]

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of VOCs and HAPs emitted into the atmosphere from the installation. Attachment A, Attachment B and Attachment C or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose.
- 2) The permittee shall maintain on file safety data sheets or other data sufficient to document the percent HAP and VOC constituents in the materials used.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Operational Limitation:

The permittee shall keep all coatings and chemical solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all coatings and chemical solution containers used with this equipment. [Special Condition 4A]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001 10 CSR 10-6.060 Construction Permits Required Construction Permit 052012-015, Issued May 22, 2012

Emission Unit	Description	Control Devices
CB K2Xa	Primaries Primer Booths	Fabric Filters
CB K2Xb	Primaries Topcoat	Fabric Filters
E6-CB 1	Extrusion Line 6 Coating Booth 1	Fabric Filters
E6-CB 2	Extrusion Line 6 Coating Booth 2	Fabric Filters

Emission Limitation:

The permittee shall control particulate emissions from the spray guns using booths equipped with fabric filters [Special Condition 3A]

Equipment Specification:

- 1) The permittee shall ensure that each booth shall be completely enclosed during operations (i.e. all openings, including doors, windows, etc. shall be closed). [Special Condition 3B]
- 2) The permittee shall ensure that the filters shall be operated and maintained in accordance with the manufacturer's specifications and that replacement filters shall be kept on hand at all times. [Special Condition 3C]
- 3) The permittee shall equip each fabric filter with a gauge or meter, which indicates the pressure drop across the control device. The permittee shall locate the gauges or meters such that the Department of Natural Resources' employees may easily observe them. [Special Condition 3D]

Monitoring:

- 1) The permittee shall monitor and record the operating pressure drop across the filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 3E]
- 2) The permittee shall implement appropriate measures for remediation within eight (8) hours of detection of leaks or abnormal conditions.

Recordkeeping:

- 1) The permittee shall maintain an operating and maintenance log for the filters which shall include the following [Special Condition 3F]:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 2) The permittee shall use Attachment D or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the filters.

- 3) The permittee shall use Attachment E or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the operating pressure drop across the filters.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION 002 10 CSR 10-6.060 Construction Permits Required Construction Permit 092011-005, Issued September 23, 2011

Emission Unit	Description	Control Device
E1-CB2	Extrusion Line 1 Coating Booth 2	Overspray Collection System

Emission Limitation:

The permittee shall use a total enclosure to capture emissions from the spray coating activities [Special Condition 3A]

Equipment Specification:

- 1) The permittee shall utilize a spray booth having four complete walls or side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of the booth may have openings to allow for conveyors and parts to pass through the booth during the coating process. [Special Condition 3B]
- 2) The permittee shall control particulate emissions from the spray booth using an overspray collection system. [Special Condition 4A]
- 3) The permittee shall operate and maintain the overspray collection system in accordance with the manufacturer's specifications. The overspray collection system shall be equipped with a gauge or meter, which indicates the pressure drop across the control device and the permittee shall locate these gauges or meters such that the Department of Natural Resources' employees may easily observe them. [Special Condition 4B]
- 4) The permittee shall ensure that replacement filters for the overspray collection system be kept on hand at all times. The filters shall have a control efficiency for total particulate of at least 25% per manufacturer's guarantee. [Special Condition 4C]

Monitoring:

- 1) The permittee shall monitor and record the operating pressure drop across the overspray collection system at least once every 7 days. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 4D]
- 2) The permittee shall implement appropriate measures for remediation within eight (8) hours of detection of leaks or abnormal conditions.
- 3) The permittee shall use Attachment F or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the operating pressure drop on the overspray collection system.

- 4) The permittee shall maintain an operating and maintenance log for the overspray collection system which shall include the following [Special Condition 4E]:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 5) The permittee shall use Attachment D or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective action requirements.

Recordkeeping:

- 1) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Safety Data Sheets (SDS) for all materials used at the installation. [Special Condition 5A]

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION 003
10 CSR 10-6.060 Construction Permits Required
Construction Permit 052012-015, Issued May 22, 2012

Emission Unit	Description
E6-01	Line 6 Hot Air Curing
E6-X	Line 6 Extruder
PRESSES	Presses

Emission Limitation:

The permittee shall emit less than 1.0 ton of acetophenone and 1.0 ton of carbon disulfide in any consecutive 12-month period from the Line 6 Hot Air Curing (E6-01), Line 6 Extruder (E6-X) and the Presses (PRESSES). [Special Condition 2C]

Recordkeeping:

- 1) The permittee shall maintain an accurate record of acetophenone and carbon disulfide emitted into the atmosphere from the installation. Attachment B or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose.
- 2) The permittee shall maintain on file safety data sheets or other data sufficient to document the percent HAP constituents in the materials used.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION 004 10 CSR 10-6.060 Construction Permits Required Construction Permit 0899-005, Issued May 19, 1999

Emission Unit	Description	Control Device
E2-FB	Adhesive Application – Flock Booth	Baghouse

Emission Limitation:

The permittee shall control emissions from the flock booth (E2 – FB) with a baghouse. The baghouse must be in use at all times when the flock booth in operation, and shall be operated and maintained in accordance with the manufacturer’s specifications. [Special Condition 6]

Equipment Specification:

- 1) The permittee shall ensure that the baghouse is equipped with a gauge or meter, which indicates the pressure drop across the baghouse located such that it may be easily observed by the Missouri Department of Natural Resources’ employees. [Special Condition 6]
- 2) The permittee shall ensure that the bags be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance. [Special Condition 6]
- 3) The permittee shall ensure that replacement bags for the baghouse be kept on hand at all times. [Special Condition 6]
- 4) The permittee shall implement appropriate measures for remediation within eight (8) hours of detection of leaks or abnormal conditions.

Monitoring/Recordkeeping:

- 1) The permittee shall monitor and record the operating pressure drop across the baghouse at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition 7]
- 2) The permittee shall use Attachment E or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the operating pressure drop across the baghouse.
- 3) The permittee shall maintain an operating and maintenance log for the baghouse which shall include the following [Special Condition 8]:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

- 4) The permittee shall use Attachment D or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective action requirements.
- 5) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Safety Data Sheets (SDS) for all materials used at the installation.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION 005
10 CSR 10-5.330 Control of Emissions from Industrial Surface Coating Operation

Emission Unit	Description	Control Device
CB4	Coating: Water Base	Panel Filter
CB9	Coating Application	Panel Filter
E1-CB2	Extrusion Line 1 Coating Booth 2	Overspray Collection System
E1-02	Line 1 2 nd Hot Air Curing Oven	None
E2-02	Electric Curing Oven for TPV	None
E4-CB1	Coating: Water-base	Panel Filter
E4-CB2	Coating Booth	Panel Filter
SE3-CB	Line 3 Coating Booth	Panel Filter
SE3-01	Line 3 Hot Air Rubber Curing Process	None
SE7-IR	Line 7 IR Oven	None
SE7-CB	Line 7 Coating Booth	Panel Filter

Emission Limitation:

The permittee shall not emit or discharge into the atmosphere volatile organic compounds (VOCs) in excess of 3.5 lb VOC/gallon of coating (less water and non-VOC organic compounds).

Monitoring:

- 1) The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
- 2) The permittee shall use the following procedures for determining the daily volume-weighted average pounds (DAVG_{vw}) VOC emitted per gallon of coating (minus water and non-VOC organic compounds): Calculate the DAVG_{vw} of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

$DAVG_{vw}$ = Daily volume-weighted average

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = VOC content of the coating as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds)

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation;

n = number of coatings used in a surface coating operation.

- 3) If the daily volume-weighted average ($DAVG_{vw}$) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

Recordkeeping:

- 1) The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include:
 - a) Daily records of the type and the quantity of coatings used daily;
 - b) The coatings manufacturer's formulation data for each coating in forms provided or approved by the director;
 - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
 - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) Records of the type and quantity of waste solvents reclaimed or discarded daily;
 - f) Records of the quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
- 2) The permittee shall maintain all records for a minimum of five (5) years.
- 3) The permittee shall make all records available immediately upon request to the Air Pollution Control Program of the Department of Natural Resources personnel.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION 006
 10 CSR 10-5.330 Control of Emissions from Industrial Surface Coating Operation

Emission Unit	Description	Control Device
CF-1	Adhesive Application, Corner Flocker	None
CF-2	Adhesive Application, Corner Flocker	None
E2-FB	Adhesive Application, Flock Booth	Baghouse
E4-FB	Adhesive Application, Flock Booth	Baghouse
E5-CB	Spray Coating Booth	Panel Filter

Emission Limitation:

The permittee shall not emit or discharge into the atmosphere volatile organic compounds (VOCs) in excess of 6.3 lb VOC/gallon of the adhesive coating (less water and non-VOC organic compounds).

Monitoring:

- 1) The permittee shall determine the composition of the adhesives by formulation data supplied by the manufacturer of the adhesive or from data determined by an analysis of each adhesive, as received, by EPA Reference Method 24.
- 2) The permittee shall use the following procedures for determining the daily volume-weighted average pounds (DAVG_{vw}) VOC emitted per gallon of adhesive (minus water and non-VOC organic compounds): Calculate the DAVG_{vw} of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

DAVG_{vw} = Daily volume-weighted average

A = daily gal each adhesive used (minus water and exempt solvents) in a surface coating operation;

B = VOC content of the adhesive as applied, expressed as pounds of VOC per gallon of adhesive (minus water and exempt compounds)

C = total daily gal adhesives used (minus water and exempt solvents) in a surface coating operation;

n = number of adhesives used in a surface coating operation.

- 3) If the daily volume-weighted average (DAVG_{vw}) is less than 6.3 lb VOC per gallon of adhesive (less water and non-VOC organic compounds), the source is in compliance.

Recordkeeping:

- 1) The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include:
 - a) Daily records of the type and the quantity of adhesives used daily;
 - b) The coatings manufacturer's formulation data for each adhesive in forms provided or approved by the director;
 - c) Records of the weighted average VOC content for each adhesive type included in averaging for adhesive operations that achieve compliance through adhesive VOC content or a combination of adhesive VOC content and control systems;
 - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) Annual VOC emissions from surface coating equipment cleaning;

- f) Any additional information pertinent to determine compliance.
- 2) The permittee shall maintain all records for a minimum of five (5) years.
- 3) The permittee shall make all records available immediately upon request to the Air Pollution Control Program of the Department of Natural Resources personnel.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION 007
10 CSR 10-6.400 Control of Emission of Particulate Matter From Industrial Processes

Emission Unit	Description	Control Device
SE3-CB	Line 3 Coating Booth	Panel Filter
E4-CB1	Line 4 Coating Booth 1	Panel Filter
E4-CB2	Line 4 Coating Booth 2	Panel Filter
E5-CB	Line 5 Coating Booth	Panel Filter
SE7-CB	Line 7 Coating Booth	Panel Filter
CB4	Coating Booth 4	Panel Filter

Operational Requirements:

- 1) These units are provided a conditional exemption from this rule per §6.400(1)(B)14.
- 2) The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring and maintenance requirements for the associated control device.

Monitoring:

- 1) The permittee shall not operate the booths equipped with mat/panel filters without a filter in place.
- 2) The permittee shall inspect the filters holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The permittee shall inspect the filters before spraying begins in a booth and after installation of a new filter on each shift.
- 4) The permittee shall follow the manufacturer’s recommendations with regard to installation and frequency of replacement of the filters.

Recordkeeping:

- 1) The permittee shall maintain records of the inspections of mat/panel including when they occur.
- 2) The permittee shall use Attachment D, or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program to maintain a log to be used to certify compliance with this requirement.

- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION 008
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Unit	Description	Control Device
CB K2Xa	Primaries Primer Booths	Fabric Filters
CB K2Xb	Primaries Topcoat	Fabric Filters
CB4	Coating: Water Base	Panel Filter
CB9	Coating Application	Panel Filter
CF-1	Adhesive Application, Corner Flocker	None
CF-2	Adhesive Application, Corner Flocker	None
E1-01	Hot Air Curing Oven, Natural Gas Combustion	None
E1-CB2	Extrusion Line 1 Coating Booth 2	Overspray Collection System
E1-X	Rubber Extruder	None
E1-02	Line 1 2 nd Hot Air Curing Oven	None
E2-02	Electric Curing Oven for TPV	None
E2-FB	Adhesive Application, Flock Booth	Baghouse
E2-X	TPV Extruder	None
E4-01	Hot Air Curing Oven, Natural Gas Combustion	Panel Filter
E4-CB1	Line 4 Coating Booth 1	Panel Filter
E4-CB2	Line 4 Coating Booth 2	Panel Filter
E4-FB	Adhesive Application, Flock Booth	Baghouse
E4-X	Rubber Extruder	None
E5-01	Hot Air Curing Oven, Natural Gas Combustion	Panel Filter
E5-CB	Line 5 Coating Booth	Panel Filter
E5-X	Rubber Extruder,	None
E6-01	Hot Air Curing Oven, Natural Gas Combustion	None
E6-CB 1	Extrusion Line 6 Coating Booth 1	Fabric Filters
E6-CB 2	Extrusion Line 6 Coating Booth 2	Fabric Filters
E6-X	Rubber Extruder,	None
E8-X	TPV Extruder	None
SE3-01	Line 3 Hot Air Rubber Curing Process	None
SE3-CB	Line 3 Coating Booth	Panel Filter
SE3-X	Rubber Extruder	None
SE7-01	Line 3 salt rubber curing process	None
SE7-CB	Line 7 Coating Booth	Panel Filter
SE7-IR	Line 7 IR Oven	None
SE7-X	Rubber Extruder	None

Emission Limitation:

The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 any visible emissions in excess of the 20% limit specified by this rule.

Monitoring/Recordkeeping/Reporting:

See Statement of Basis

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. 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 10-6.100 Alternate Emission Limits

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

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 submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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 not federally enforceable.

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

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

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.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning

stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations
(Rescinded on February 11, 1979, Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

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.
 - 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, §(5)(E)2 and §(6)(C)1.B Permit Duration

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, 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) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - 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 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no

later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized

agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):

- a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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 the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
- a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide 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 written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Jim Eichelberger, Plant Manager. On September 23, 2016 the Air Pollution Control Program was informed that Stacy Hymer, Plant Manager 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:

- a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

ATTACHMENT A
 Monthly VOC Compliance Worksheet

This sheet covers the month of _____ in the year _____.

A	B	C	D	E
Material Used, (Name, CAS #)	Amount of Material Used (Include Units)	Density (lbs/gal)	VOC Content (Weight %)	VOC Emissions (Tons)
(F) Plant-wide Natural Gas Combustion	mmscf	-----	2.8 lb/mmscf	
G Total VOC Emissions Calculated for this Month in Tons				
H 12-Month VOC Emissions Total from Previous Month's Worksheet in Tons				
I Monthly VOC Emissions Total from Previous Year's Worksheet in Tons				
J Current 12-month Total of VOC Emissions in Tons				

Instructions: This worksheet must include VOC emissions from all emission units installed or permitted at the time of permit issuance.

- A. Record the name of each material used that contains a VOC. Amounts and types of VOC can vary depending upon type of coatings used.
- B. Record the usage and units of the material.
- C. Record the material density.
- D. Record the VOC content from the SDS.
- E. Calculate the VOC emissions;
 - 1. If the usage is in tons $E = B \times D$;
 - 2. If usage is in pounds $E = B \times D / 2000$;
 - 3. If usage is in gallons $E = B \times C \times D / 2000$.
- F. Amount of VOC emissions estimated plantwide for all natural gas utilized this month, in Tons;
 Emission Factor = 2.8 lbs/mmscf, from AP42, Fifth Edition. $E = ((\text{mmscf natural gas} \times 2.8 \text{ lb/mmscf}) / 2000)$
- G. Sum the individual E.
- H. Record "I" from last month.
- I. Record "F" from this month last year.
- J. Current 12 month VOC emissions. $I = (F + G - H)$.

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance/Enforcement section during the most recent 12-month period must be included in the rolling total.

STATEMENT OF BASIS

Voluntary Limitations

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

INSTALLATION DESCRIPTION

Henniges Automotive manufactures automotive sealing and anti-vibration products. The installation is a synthetic minor source of Hazardous Air Pollutants (HAP) and a synthetic minor source of Volatile Organic Compounds (VOC). The facility has limited VOC emissions to less than 100 tons per year and has limited HAP emissions to less than 10 tons per year for individual HAPs and less than 25 tons/year for total HAPs. These limits are part of the special conditions in the latest issued construction permit, 052012-015, Issued May 22, 2012. Process operations include rubber and TPV extrusion, curing ovens, adhesive application, surface coating, and presses. SE3-IR, Line 3 Infrared Oven is an electric oven, and all emissions previously noted under this emission unit have been and continue to be counted under emission point SE3-01, so emission unit SE3-IR has been removed from the permit. The regenerative thermal oxidizer and associated coating approved under No Construction Permit Required, Issued October 19, 2007, was never installed and the associated coating, L1951, is not used at the plant.

The facility was originally GenCorp – New Haven. In 2000 the company changed to GDX Automotive – New Haven. On January 30, 2002, the Air Pollution Control Program received the Initial Part 70 application. In an email received on February 1, 2007, GDX Automotive stated that they would accept voluntary limits in order to go to an Intermediate Operating Permit. Also in 2007 MAPS Holding Inc. acquired GDX Automotive, who then changed the company name to Henniges Automotive, with Headquarters located in Auburn Hills, Michigan.

The following emission units have been dismantled and/or removed and have been excluded from the permit:

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
CB3	Coating Booth 3
E2-01	Line 2 Hot Air Curing Oven for Rubber, Natural Gas Combustion
E2-02	Line 2 Hot Air Curing Oven for Rubber, Natural Gas Combustion (replaced with electric curing oven)
E4-02	Line 4 2 nd Hot Air Curing Oven
E5-02	Line 5 2 nd Hot Air Curing Oven
E8-01	PVC Line 8 Hot Air Curing Oven, Natural Gas Combustion
E8-CB	PVC Line 8 Coating Booth
E8-FB	PVC Line 8 Flock Booth
MCB	Molding Coating Booth #1

Emission Unit #	Description of Emission Unit
MCB	Molding Coating Booth #2
SE6-01	Line 6 Salt Curing
SE6-CB	Line 6 Coating Booth
SE6-IR	Line 6 Infrared Oven
SE6-X	Line 6 Extrusion
SE6-IR	Line 6 IR Oven
OLF-1	Off-line Flocker
OLF-2	Off-line Flocker
PVC Bond	Polyurethane Bonding Process

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	0.89
NO _x	6.25
PM ₁₀	0.34
PM _{2.5}	0.34
SO _x	0.03
VOC	< 100 ²
HAP	< 10/25 ²

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

²The installation is limited by Permit Condition PW001 to:

- ◆ Less than 100 tons of VOCs from the entire installation during any consecutive 12 month period.
- ◆ Less than 10 tons of any individual HAPs from the entire installation during any consecutive 12 month period.
- ◆ Less than 25 tons of HAPs in aggregate from the entire installation during any consecutive 12 month period.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.06	0.06	0.03	--	--
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.06	0.06	0.03	--	--
Sulfur Oxides (SO _x)	0.02	0.02	0.01	0.002	0.002
Nitrogen Oxides (NO _x)	2.89	2.90	1.55	0.53	0.53
Volatile Organic Compounds(VOC)	23.44	23.45	15.85	14.23	14.23
Carbon Monoxide (CO)	0.41	0.41	0.22	--	--
Hazardous Air Pollutants ¹ (HAPs)	1.28	1.28	0.26	--	--

¹The installation does emit HAPS; however, the installation reports their HAP emissions as VOCs as explained in 10 CSR 10-6.110 - *Reporting Emission Data, Emission Fees, and Process Information*.

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received October 11, 2011;
- 2) 2014 Emissions Inventory Questionnaire, received April 17, 2015; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit 052012-015, Issued May 22, 2012
- 5) Construction Permit 092011-005, Issued September 23, 2011
- 6) No Construction Permit Required Determination, Issued January 31, 2008
- 7) Construction Permit 012008-013, Issued January 29, 2008
- 8) Intermediate Operating Permit, Issued April 11, 2007
- 9) Amendment of Construction Permit 052004-007A, Issued November 30, 2005
- 10) No Construction Permit Required Determination, Issued November 16, 2004
- 11) Construction Permit 022004-017, Issued February 26, 2004
- 12) No Construction Permit Required Determination, Issued August 4, 2003
- 13) Construction Permit 032003-018, Issued March 18, 2003
- 14) Construction Permit 092002-008, Issued September 11, 2002
- 15) Amendment of Construction Permit 122000-002A, Issued June 25, 2002
- 16) Construction Permit 052002-005, Issued April 3, 2002
- 17) Construction Permit 072001-015, Issued July 18, 2001
- 18) Construction Permit 032001-013, Issued March 27, 2001
- 19) Construction Permit 122000-002, Issued December 6, 2000
- 20) Construction Permit 0899-006, Issued August 9, 1999
- 21) Construction Permit 1298-007, Issued December 14, 1998
- 22) No Construction Permit Required Determination, Issued October 31, 1996

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

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

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

Since the facility only utilizes natural gas in the ovens, the coating booths have control equipment for particulate matter and the rubber and TPV extruders are not expected to have visible emissions during the extruding process, there are no visible emissions expected. No recordkeeping, monitoring or reporting is required. See Section IV. Core Permit Requirements.

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

This regulation was added as a permit condition with no monitoring, recordkeeping or reporting required. Since the facility only utilizes natural gas in the ovens, the coating booths have control equipment for particulate matter and the rubber and TPV extruders are not expected to have visible

emissions during the extruding process, there are no visible emissions expected. See Permit Condition 008.

10 CSR 10-5.040, Use of Fuel in Hand-Fired Equipment Prohibited

This regulation was included as a core permit requirement for all installations in the St. Louis Metropolitan area.

10 CSR 10-5.330, Control of Emissions from Industrial Surface Coating Operations

This regulation is applicable to the installation as the installation has actual emissions of VOCs greater than three tons per twelve month rolling period. See Permit Condition 005 and Permit Condition 006.

Construction Permit History

No Construction Permit Required Determination, Issued October 31, 1996

- ◆ This no construction permit required determination is for the installation of an injection press and glass prep system.

Construction Permit 1298-007, Issued December 14, 1998

- ◆ This de minimis construction permit is for the installation of twenty corner plug presses and two corner flockers.
 - a) Construction Permit 1298-007 was superseded by Construction Permit 122000-002. Therefore, the special conditions are not included in this operating permit.

Construction Permit 0899-005, Issued August 9, 1999

- ◆ This de minimis construction permit is for the installation of two extrusion lines.
 - a) Special Conditions 6, 7, and 8 are included in this operating permit.
 - b) Construction Permit 0899-005 was superseded by Construction Permit 052004-007A. Therefore, the special condition 2, 3, 4, and 5 are not included in this operating permit.

Construction Permit 0899-006, Issued August 9, 1999

- ◆ This de minimis construction permit is for the addition of 16 new presses and a hand wipe station.
 - a) Construction Permit 0899-006 was superseded by Construction Permit 122000-002. Therefore, the special conditions are not included in this operating permit.

Construction Permit 122000-002, Issued December 6, 2000

- ◆ This de minimis construction permit is for the installation of 63 corner plug presses, two corner flockers, 16 mold presses, two extrusion lines, two molding coating booths and one (1) 3.5" extruder.
 - a) Construction Permit 122000-002 was superseded by Construction Permit 052004-07A. Therefore, the special conditions are not included in this operating permit.

Construction Permit 032001-013, Issued March 27, 2001.

- ◆ This de minimis construction permit is a modification of Construction Permit 0899-005, Issued August 9, 1999 and is for the installation of a coating booth and an electric curing oven on extrusion Line 2.

- a) Construction Permit 032001-013 was superseded by Construction Permit 052004-07A.
Therefore, the special conditions are not included in this operating permit.

Construction Permit 072001-015, Issued July 18, 2001.

- ◆ This de minimis construction permit is for the installation of a new extrusion line, eight coating booths and twelve injection presses.
 - a) Construction Permit 072001-015 was superseded by Construction Permit 052004-007A.
Therefore, the special conditions are not included in this operating permit.

Construction Permit 052002-005, Issued April 3, 2002.

- ◆ This de minimis construction permit is for the installation of Extrusion Line 4 along with 31 presses.
 - a) Construction Permit 052002-005 was superseded by Construction Permit 092002-008.
Therefore, the special conditions are not included in this operating permit.

Amendment of Construction Permit 122000-002A, Issued June 25, 2002

- ◆ This amendment is for the installation of two extrusion lines approved under Construction Permit 122000-002, Issued December 9, 1998.
 - a) Construction Permit 122000-002A was superseded by Construction Permit 052004-007A.
Therefore, the special conditions are not included in this operating permit.

Construction Permit 092002-008, Issued September 11, 2002.

- ◆ This de minimis construction permit is for the installation of extrusion line 5 along with 31 presses.
 - a) Construction Permit 092002-008 was superseded by Construction Permit 022004-017.
Therefore, the special conditions are not included in this operating permit.

Construction Permit 032003-018, Issued March 18, 2003.

- ◆ This de minimis construction permit is for the installation of a coating booth.
 - a) Construction Permit 032003-018 was superseded by Construction Permit 052004-007A.
Therefore, the special conditions are not included in this operating permit.

No Construction Permit Required Determination, Issued August 4, 2003

- ◆ This no construction permit required determination is for a change in the exhaust configuration.

Construction Permit 022004-017, Issued February 26, 2004.

- ◆ This de minimis construction permit is for the installation of a new GMX-001 Platform and a new polyvinyl chloride (PVC) bonding process.
 - a) Construction Permit 022004-017 was superseded by Construction Permit 052004-007A.
Therefore, the special conditions are not included in this operating permit.
 - b) PVC has been replaced by TPV

Construction Permit 052004-007, Issued May 12, 2004.

- ◆ This de minimis construction permit is for the installation of an extrusion line, 16 rubber presses, a coating booth, and a wipe coating operation.
 - a) Construction Permit 052004-007 was superseded by Construction Permit 052004-007A.
Therefore, the special conditions are not included in this operating permit.

No Construction Permit Required Determination, Issued November 16, 2004

- ◆ This no construction permit required determination is for the installation of a wipe on coating/primer process.

Amendment of Construction Permit 052004-007A, Issued November 30, 2005

- ◆ This amendment is for the removal of all HAP limitations contained in this and previously issued new source review permits.
 - a) Construction Permit 052004-007A was superseded by Construction Permit 012008-013, Issued January 29, 2008. Therefore, the special conditions are not included in this operating permit.

No Construction Permit Required Determination, Issued January 31, 2008

- ◆ This no construction permit required determination is for the installation of a regenerative thermal oxidizer. This was never purchased or installed at the plant.

Construction Permit 012008-013, Issued January 29, 2008.

- ◆ This de minimis construction permit is for the installation of one spray coating booth, one primer spray booth, two infrared ovens, three offline flockers, a PVC extrusion line, and two brush adhesive booths.
 - a) Construction Permit 012008-013 was superseded by Construction Permit 092011-005. Therefore, the special conditions are not included in this operating permit.
 - b) PVC has been replaced by TPV.

Construction Permit 092011-005, Issued September 23, 2011.

- ◆ This de minimis construction permit is for the installation of an inline spray coating booth for an extrusion line.
 - a) Special Condition 3, 4, and 5 are included in this permit.
 - b) Construction Permit 092011-005 was superseded by Construction Permit 052012-015. Therefore, special condition 2 is not included in this operating permit.

Construction Permit 052012-015, Issued May 22, 2012.

- ◆ This de minimis construction permit is for the installation of one rubber extrusion and coating line (extrusion line no. 6), four coating booths, two catalytic pre-heat ovens, one catalytic curing oven and 121 rubber presses.
 - a) Special Condition 2, 3, 4 and 5 are included in this permit.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart MM, *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations* is not applicable to the installation and has not been applied within this permit because this facility produces and coats parts for automobiles, but does not coat automobile or light duty truck bodies.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart IIII – *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks* is not applicable to the installation and has not been applied within this permit because the installation is not a major source of HAPs.

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

Product is not applicable to the installation and has not been applied within this permit because the installation is not a major source of HAPs.

40 CFR Part 63, Subpart PPPP - *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*, is not applicable to the installation and has not been applied within this permit. The permittee accepted HAP limitations on April 11, 2007 to ensure that they would not be major for HAPs, which also makes them not subject to this rule as the compliance date of the rule was April 19, 2007.

40 CFR Part 63, Subpart HHHHH, *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing*, is not applicable to the installation and has not been applied within this permit because the installation is not a major source of HAPs.

40 CFR Part 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, is not applicable because this installation is not a paint stripping operation or an autobody refinishing operation and the installation does not use spray coating containing chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni) or cadmium (Cd).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Greenhouse Gas Emissions

There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

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

This rule is applicable to the facility and has been applied to the facility. See Permit Condition 008. Since the facility only utilizes natural gas in the ovens, the coating booths have control equipment for particulate matter and the rubber and TPV extruders are not expected to have visible emissions during the extruding process, there are no visible emissions expected, therefore there are no monitoring, recordkeeping or recording requirements.

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

This rule applies to the following equipment, and the calculations below verify compliance for both the PM Emission Rate and the PM Concentration for the listed emission units provided that the required control devices are in operation and working properly.

A conditional exemption from 10 CSR 10-6.400 (1)(B)14 has been applied to the units in Table 1 and Table 2 as these units are equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers' specifications or comparable maintenance procedures that meet or exceed manufacturers' specifications. See Permit Condition 007:

PM Emission Rate Compliance

$$\text{MHDR (ton/hr)} = \text{MHDR (gal/hr)} * \text{Density (lb/gal)} * (\text{ton}/2000 \text{ lb})$$

$$\text{Emission Rate (lb/hr)} = \text{MHDR (ton/hr)} * (\% \text{ solids}/100 * 2000 \text{ lb/ton}) * (1 - \text{Transfer Eff}/100) * (1 - (\text{Overall Control Eff}/100))$$

Table 1

Emission Unit ID	MHDR (gal/hr)	Density ¹ (lb/gal)	MHDR (ton/hr)	% solids ²	Capture Efficiency (%) ²	Control Efficiency (%) ²	Transfer Efficiency (%) ²	Potential Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)
SE3-CB	0.95	8.60	0.00408	50	95	99.5	75	0.06	0.11
E4-CB1	0.97	8.42	0.00408	50	95	99.5	75	0.06	0.11
E4-CB2	0.87	8.42	0.00365	50	95	99.5	75	0.05	0.10
E5-CB	0.94	8.67	0.00408	50	95	99.5	75	0.06	0.11
SE7-CB	0.93	8.80	0.00408	50	95	99.5	75	0.06	0.11
CB4	1.80	8.60	0.00773	50	95	99.5	75	0.11	0.14

¹The density was pulled from the Safety Data Sheets provided by Henniges Automotive.

²The % solids, capture efficiency, control efficiency and transfer efficiency were pulled from OP2007-011.

PM Concentration Compliance

Emission rate (gr/dscf) = Emission Rate (lb/hr)*7000 (grains/lb)/Stack flow rate (SCFM)/60(min/hr)

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

Table 2

Emission Unit ID	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
SE3-CB	0.06	77	10,084	9,915	0.0007	0.30
E4-CB1	0.06	77	10,084	9,915	0.0007	0.30
E4-CB2	0.05	77	10,084	9,915	0.0007	0.30
E5-CB	0.06	77	6,742	6,629	0.0005	0.30
SE7-CB	0.06	77	6,742	6,629	0.0005	0.30
CB4	0.11	77	19,500	19,173	0.0006	0.30

10 CSR 10-6.400 was not applied to the units listed in Table 3 because each unit has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter and is therefore exempt according to §(1)(B)12.

Table 3

Emission Point	Associated Equip.	Max Hourly Design Rate	PM Emission Factor	Emission Factor (EF) Reference	Potential Uncontrolled Emission Rate ()
E1-X	Line 1 Rubber Extrusion	0.58 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	1.16x10 ⁻⁸ lb/hr
E2-X	Line 2 TPV Extrusion	0.35 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	0.70x10 ⁻⁸ lb/hr
E4-X	Line 4 Rubber Extrusion	0.6 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	1.20x10 ⁻⁸ lb/hr
E5-X	Line 5 Rubber Extrusion	0.5 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	1.00x10 ⁻⁸ lb/hr
E6-X	Line 6 Rubber Extrusion	0.25 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	0.50 x10 ⁻⁸ lb/hr
E8-X	Line 8 TPV Extruder	0.16 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	0.32x10 ⁻⁸ lb/hr
SE3-X	Line 3 Rubber Extrusion	0.16 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	0.32x10 ⁻⁸ lb/hr
SE7-X	Line 7 Rubber Extrusion	0.75 tons/hr	2.0x10 ⁻⁸ lb/ton	OP2007-011	1.50x10 ⁻⁸ lb/hr
E1-01	Line 1 Hot Air Curing Oven for Rubber	0.0015 mmscf/hr	7.6 lb/mmscf	AP42 Table 1.4-2	0.01 lb/hr
E4-01	Line 4 Hot Air Curing Oven for Rubber	0.0027 mmscf/hr	7.6 lb/mmscf	AP42 Table 1.4-2	0.02 lb/hr
E5-01	Line 4 Hot Air Curing Oven for Rubber	0.0052 mmscf/hr	7.6 lb/mmscf	AP42 Table 1.4-2	0.04 lb/hr
E6-01	Line 6 Hot Air Curing Oven for Rubber	0.0008 mmscf/hr	7.6 lb/mmscf	AP42 Table 1.4-2	0.01 lb/hr

Flock Booths (E2-FB, E4-FB)

The adhesive and flock application is a two-part process. In the first part of the process, referred to as the “flock booth”, a hose drips adhesive on the rubber/TPV and the adhesive is spread with paint brushes. In the second part of the process, the rubber/TPV is conveyed to the “flock house” where polyester flock is shaken onto the rubber/TPV parts and an electrostatic charge is applied. There are baghouse systems installed, which are designed to collect flock during this part of the process. These baghouses are considered process equipment and exhaust within the building. There are no stacks or vents in the “flock house.” Consequently, minimal particulate emissions would be expected from the application of adhesives and flock, and, therefore 10-6.400 was not applied.

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

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

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

5) The rule is only for administrative purposes.

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

Response to Public Comments

We received four comments from Mr. Mark A. Smith, Chief of the Air Permitting and Compliance Branch of EPA Region 7 on November 10, 2016. The comments are addressed in the order in which they appear within the letter(s).

Comment 1: After reviewing the permit history of this facility, between 1998 and 2012, EPA is unclear how MDNR concludes that Henniges-New Haven is a synthetic minor source for VOC and HAP; how Henniges New Haven is not subject to MACT PPPP; and how Henniges-New Haven is not required to need a Title V /Part 70 operating permit. The Statement of Basis, in the existing draft Intermediate State Permit to Operate on public notice, provides a construction permit history, however, MDNR needs to include a clear, concise explanation as to the basis for Henniges-New Haven not being a major source of VOC and HAP; not being subject to MACT PPPP and not requiring a Part 70 operating permit.

Response to Comment: Henniges – New Haven has established voluntary limitations for both VOC and HAPS to qualify them for an intermediate permit and establish them as a synthetic minor source of VOC and HAPs. Henniges – New Haven is not subject to MACT PPPP as the previous operating permit was issued with limitations on April 11, 2007, which is before the compliance date of MACT Subpart PPPP, April 19, 2007.

Comment 2: Henniges-New Haven facility has had several owners over the past several years. However, nowhere in the operating permit is there a discussion of this ownership history. EPA recommends MDNR include a discussion of the ownership of this facility within the installation description in the Statement of Basis.

Response to Comment: The facility ownership history has been added to the Statement of Basis.

Comment 3: All requirements in all permit conditions shall be enforceable for a practical matter. EPA's primary guidance on practical enforceability is contained in "Guidance Limiting Potential to Emit in New Source Permitting," dated June 13, 1989. One of the important measures of practical enforceability is for the requirements to identify the "who," "what," "where," "when," "how," and "how often."

Response to Comment: The wording has been corrected.

Comment 4: The monitoring requirements in Permit Condition 001, Permit Condition 002, and Permit Condition 004 all require the permittee to monitor and record the operating pressure drop across filters, overspray collection system, and bag house, respectively. However, there is no indication as to what action(s) the permittee is to undertake when the pressure drop design conditions are exceeded. EPA recommends MDNR include the permittee corrective action(s) to be taken when operating system pressure drop is outside design conditions

Response to Comment: The actions to undertake under abnormal conditions/leaks has been added to each of the permit conditions.

There were eleven comments received from Mr. Mike E. Hall, Sr. E & S Specialist on September 26, 2016. The comments are addressed in the order in which they appear within the letter(s).

Comment 1: Parent Company's Name and Address has changed since the application was received.

Response to Comment: Corrected

Comment 2: The natural gas hot air curing ovens for Line 2 have been removed and replaced with one electric oven.

Response to Comment: Corrected

Comment 3: PVC extruder has been changed to a TPV extruder, PVC is no longer processed at the plant. The hot air curing oven on E8-01 has also been removed as TPV does not require a hot air curing oven. The salt rubber curing process under SE3-01 has been changed to a hot air rubber curing process as molten salt is no longer used for curing the rubber on Extrusion Line 3.

Response to Comment: Corrected

Comment 4, 5, 6, 7: The control device for E4-CB1, E4-CB2, E4-FB, E5-FB, E5-CB has listed the Regenerative Thermal Oxidizer. The Regenerative Thermal Oxidizer was never installed. The control device for E4-CB1, E4-CB2 is a panel filter. The PVC Line 8 Hot air curing oven has also been dismantled and E8-X is a TPV extruder.

Response to Comment: Corrected

Comment 8: Under 10 CSR 10-6.170 there is a monitoring requirement that was not present in the 2007 Operating Permit, the referenced attachment does not match the requirements.

Response to Comment: Since the facility only utilizes natural gas in the ovens, the coating booths have control equipment for particulate matter and the rubber and TPV extruders are not expected to have visible emissions during the extruding process, there are no visible emissions expected. No recordkeeping, monitoring or reporting is required, the requirements were removed.

Comment 9: The responsible official is no longer Jim Eichelberger. The new responsible official is Stacy Hymer, Plant Manager.

Response to Comment: Corrected

Comment 10: Attachment E, Opacity Emission Observation does not seem to be necessary as there is no monitoring required for visible air contaminants.

Response to Comment: Attachment was removed.

Comment 11: The installation description states PVC extrusion takes place. This process has been replaced by TPV extrusion. Also note the corrections on the list of dismantled and removed equipment.

Response to Comment: Corrected

Public Notice Email to Applicant

Use the following text for the body of the public notice email. Include a pdf of the draft permit. The subject line should read –

Draft Intermediate Operating Permit for Henniges Automotive, Project No. 2011-10-021

The Air Pollution Control Program (APCP) has completed the preliminary review of your Intermediate operating permit. We are placing a public notice draft permit on the Department's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notice.htm>. The public notice period will start on **November 25, 2014**, and will last for 30 calendar days.

We will accept comments regarding the draft permit postmarked on or before the closing date. It is very important that you read and understand this legal document. It is your responsibility to comply with this document. Please address comments or recommendations for changes to Michael Stansfield, P.E., Operating Permits Unit, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

We are sending a copy of this draft to the U.S. EPA's Region VII office in Lenexa, Kansas, for their review. Your Intermediate State Operating Permit will become a part of the Missouri State Implementation Plan, and as such, federally enforceable. We may hold a public hearing if the public requests one.

Should you have any questions, or wish clarification on any items in this draft permit, please contact Michael Stansfield at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention.

Public Notice Email to Affected States and Indian Tribes

Use the following text for the body of the public notice email. The subject line should read –

Affected States Review for Henniges Automotive

In accordance with Missouri State Rule 10 CSR 10-6.065(6)(F)2. and the Clean Air Act this email is to notify you of public notice of the preliminary draft and request for comments for:

Henniges Automotive, located in New Haven, MO 63068

Project Number – 2011-10-021

A public notice draft permit will be available on the Department's web page no later than **November 25, 2014**, at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>. The public notice period will start on **November 25, 2014**, and will last for 30 calendar days.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits by no later than **December 26, 2014**, to the attention of Michael J. Stansfield, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Comments may be emailed to apcppermitpn@dnr.mo.gov

Should you require further information or documentation on this matter, please contact the Operating Permits Unit 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. Thank you for your time and attention.



Jeremiah W. (Jay) Nixon, Governor • Harry D. Bozoian, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

DEC 15 2016

Ms. Stacy Hymer
Henniges Automotive
101 Danny Scott Drive
New Haven, MO 63068

Re: Henniges Automotive, 071-0173
Permit Number: OP2016-043

Dear Ms. Hymer:

Enclosed with this letter is your intermediate 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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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/kbj

Enclosures

c: PAMS File: 2011-10-021

