

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **052013-005**

Project Number: 2012-12-020  
Installation Number: 047-0178

Parent Company: Holland 1916

Parent Company Address: 1340 Burlington Street, North Kansas City, MO 64116

Installation Name: Holland 1916

Installation Address: 1340 Burlington Street, North Kansas City, MO 64116

Location Information: Clay County, S23, T50N, R33W

Application for Authority to Construct was made for:

The removal of the current VOC annual emission limit and the ability to use two paint guns per paint booth. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

MAY 13 2013

EFFECTIVE DATE

Handwritten signature of Kyna L Moore in cursive script.

DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

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

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

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

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

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

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

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

Page No.	3
Permit No.	
Project No.	2012-12-020

**SPECIAL CONDITIONS:**

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

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

Holland 1916  
Clay County, S23, T50N, R33W

1. **Superseding Condition**  
The conditions of this permit supersede the following special conditions found in the previously issued construction permit 072012-009 issued by the Air Pollution Control Program.
  - A. Special Condition 2.
  - B. Special Condition 5.
2. **VOC Emission Limitations**
  - A. Holland 1916 shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation (see Table 1).
  - B. Holland 1916 shall emit less than ten (10.0) tons individually of Hazardous Air Pollutants (HAPs) in any consecutive 12-month period from the entire installation (see Table 1).
  - C. Holland 1916 shall emit less than five (5.0) tons of Glycol Ether in any consecutive 12-month period from the entire installation (see Table 1).
  - D. Holland 1916 shall emit less than twenty-five (25.0) tons combined of Hazardous Air Pollutants (HAPs) in any consecutive 12-month period from the entire installation (see Table 1).

Table 1: All Emission Points Reported at Holland 1916

Emission Point Number:	Description:
EP-01	Natural Gas Curing Oven
EP-02	Metal Solvent Cleaning
EP-03	No Longer Designated to an Emission Unit
EP-04	Existing Paint Booth
EP-05	New Paint Booth

Page No.	4
Permit No.	
Project No.	2012-12-020

**SPECIAL CONDITIONS:**

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

- E. Attachment A, B and C or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.
3. Record Keeping and Reporting Requirements
- A. Holland 1916 shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.
  - B. Holland 1916 shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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

Project Number: 2012-12-020  
Installation ID Number: 047-0178  
Permit Number:

Holland 1916  
1340 Burlington Street  
North Kansas City, MO 64116

Complete: December 12, 2013

Parent Company:  
Holland 1916  
1340 Burlington Street  
North Kansas City, MO 64116

Clay County, S23, T50N, R33W

REVIEW SUMMARY

- Holland 1916 has applied for authority to remove their current VOC annual emission limit and obtain the ability to use two paint guns per paint booth.
- HAP emissions are expected from the installation. HAPs of concern from this process are Xylene in the forms of Xylol and Dimethylbenzene (CAS# 95-47-6 and 1330-20-7), Cumene (CAS# 98-82-8), Ethyl Benzene (CAS# 100-41-4), and Toluene (CAS# 108-88-3).
- None of the New Source Performance Standards (NSPS) apply to the installation.
- 40 CFR 63 Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* does not apply to this installation as they do not emit any of target HAPs listed in this subpart. Subpart MMMM *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, does not apply because the installation is not a major source of HAPs. Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* does not apply to this installation as they do not emit any of target HAPs listed in this subpart.
- Panel filters are being used to control the PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the paint booths at this installation.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are above de minimis levels and conditioned below the major source level of 250.0 tons per year.
- This installation is located in Clay County, a maintenance area for ozone and an attainment area for all other criteria pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- Emissions testing is not required for the equipment.
- A Part 70 or Intermediate Operating Permit application is required for this installation. If a Part 70 Operating Permit is desired the application must be received within one year of issuance of this permit. If an Intermediate Operating Permit is desired the application must be received within 90 days of issuance of this permit.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

Holland 1916 produces metal nameplates and control panels for industrial application. This installation is located at 1340 N. Burlington Street in North Kansas City, Missouri. Holland 1916 has requested to be conditioned below the major source levels from the entire installation in this application.

Since Holland 1916 is located in Clay County and their potential to emit is greater than 2.7 tons of VOC, the installation is applicable to the requirement of Missouri State Rule 10 CSR 10-2.230 *Control of Emissions From Industrial Surface Coating Operations*. This rule requires all surface coating materials to have a VOC content of less than or equal to 3.5 pounds per gallon. Based on the application, Holland 1916 is expected to be in compliance with this rule.

The following New Source Review permits have been issued to Holland 1916 from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
102002-007	Plant moved to North Kansas City
072012-009	New Paint Booth

### PROJECT DESCRIPTION

Holland 1916 in their most recent construction permit took an installation wide VOC limit to the de minimis level of 40 tons per year. Since then Holland 1916 has determined that the current VOC limit hinders their production and they would like to remove the VOC limit to increase production. Holland 1916 also requested that it be able to use more than one paint gun in each paint booth to improve production. With the removal of the de minimis level limit and increased paint gun usage, the installation has the potential to emit VOC in excess of the major source levels of 250 tons per year. The increased paint gun usage does not debottleneck any other processes within this facility. This construction permit addresses the removal of the VOC de minimis limit and applies a new limit for the entire installation to below major source levels for construction permits of 250 tons of VOC per year to avoid PSD review. The de minimis

VOC limit was removed by this permit and will result in an increase in potential emissions from this facility. The HAP limits found in construction permit 072012-009 were also superseded and restated in this permit to be sure that the new paint guns are included in the installation wide limit. Holland 1916 must continue to comply with requirements found in construction permit 072012-009 that were not superseded by this permit.

Holland 1916 will need to obtain a Part 70 or Intermediate operating permit as a result of this construction permit. If a Part 70 Operating Permit is desired the application must be received within one year of issuance of this permit. If an Intermediate Operating Permit is desired the application must be received within 90 days of issuance of this permit.

### EMISSIONS/CONTROLS EVALUATION

The following table provides an emissions summary for this project. Existing potential emissions were taken from construction permit 072012-009. Existing actual emissions were taken from the installation's 2011 EIQ. Potential emissions of the application represent the potential of the entire installation, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2011 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	9.71	N/D	9.71	9.71
PM <sub>10</sub>	15.0	9.71	N/D	9.71	9.71
PM <sub>2.5</sub>	10.0	9.71	N/D	9.71	9.71
SO <sub>x</sub>	40.0	0.01	N/D	0.01	0.01
NO <sub>x</sub>	40.0	0.86	0.068	0.86	0.86
VOC	40.0	<40.0	3.54	>282.29	<250.0
CO	100.0	0.72	N/D	N/A	0.72
HAPs	25.0	<25.0	N/D	<25.0	<25.0
Glycol Ether <sup>1</sup>	5.0 <sup>5</sup>	<5.0	N/A	<5.0	<5.0
DGBE <sup>2</sup>	5.0 <sup>5</sup>	<10.0	N/A	<10.0	<10.0
EGME <sup>3</sup>	N/A	N/A	N/A	N/A	N/A
Toluene	10.0 <sup>5</sup>	<10.0	N/A	<10.0	<10.0
Xylene <sup>4</sup>	10.0 <sup>5</sup>	<10.0	N/A	<10.0	<10.0
Cumene	10.0 <sup>5</sup>	<10.0	N/A	<10.0	<10.0
Ethyl Benzene	10.0 <sup>5</sup>	<10.0	N/A	<10.0	<10.0

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

<sup>1</sup> Glycol Ether has a SMAL of 5.0 ton per year and was not modeled against its Risk Assessment Level (RAL) via SCREEN3 in permit # 102002-007 therefore in permit 072012-009 they were limited to 5.0 tons per year of Glycol Ether.

<sup>2</sup> DGBE = diethelene glycol monobutyl ether. In permit # 102002-007 DGBE was modeled using SCREEN3 and was found to in compliance with the 24 hour RAL of 4500.0 ug/m<sup>3</sup> therefore DGBE was limited in permit 072012-009 to the individual HAP limit of 10.0 tons per year.

<sup>3</sup> EGME = ethylene glycol monobutyl ether. This HAP has been delisted since the issuance of permit # 102002-007 therefore it is no longer needed to be tracked.

<sup>4</sup> Xylene includes potential emissions as Xylol and Dimethylbenzene

<sup>5</sup> SMAL = Screen Modeling Action Level

## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are above de minimis levels and conditioned below the major source level of 250.0 ton per year.

## APPLICABLE REQUIREMENTS

Holland 1916 shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165
- 10 CSR 10-2.230 *Control of Emissions From Industrial Surface Coating Operations*

## STAFF RECOMMENDATION

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

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Gerad Fox  
New Source Review Unit

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Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated December 7, 2013, received December 12, 2013, designating Holland 1916 as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.







## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....	percent	<b>m/s</b> .....	meters per second
<b>°F</b> .....	degrees Fahrenheit	<b>Mgal</b> .....	1,000 gallons
<b>acfm</b> .....	actual cubic feet per minute	<b>MW</b> .....	megawatt
<b>BACT</b> .....	Best Available Control Technology	<b>MHDR</b> .....	maximum hourly design rate
<b>BMPs</b> .....	Best Management Practices	<b>MMBtu</b> ....	Million British thermal units
<b>Btu</b> .....	British thermal unit	<b>MMCF</b> .....	million cubic feet
<b>CAM</b> .....	Compliance Assurance Monitoring	<b>MSDS</b> .....	Material Safety Data Sheet
<b>CAS</b> .....	Chemical Abstracts Service	<b>NAAQS</b> ...	National Ambient Air Quality Standards
<b>CEMS</b> .....	Continuous Emission Monitor System	<b>NESHAPs</b>	..... National Emissions Standards for Hazardous Air Pollutants
<b>CFR</b> .....	Code of Federal Regulations	<b>NO<sub>x</sub></b> .....	nitrogen oxides
<b>CO</b> .....	carbon monoxide	<b>NSPS</b> .....	New Source Performance Standards
<b>CO<sub>2</sub></b> .....	carbon dioxide	<b>NSR</b> .....	New Source Review
<b>CO<sub>2e</sub></b> .....	carbon dioxide equivalent	<b>PM</b> .....	particulate matter
<b>COMS</b> .....	Continuous Opacity Monitoring System	<b>PM<sub>2.5</sub></b> .....	particulate matter less than 2.5 microns in aerodynamic diameter
<b>CSR</b> .....	Code of State Regulations	<b>PM<sub>10</sub></b> .....	particulate matter less than 10 microns in aerodynamic diameter
<b>dscf</b> .....	dry standard cubic feet	<b>ppm</b> .....	parts per million
<b>EQ</b> .....	Emission Inventory Questionnaire	<b>PSD</b> .....	Prevention of Significant Deterioration
<b>EP</b> .....	Emission Point	<b>PTE</b> .....	potential to emit
<b>EPA</b> .....	Environmental Protection Agency	<b>RACT</b> .....	Reasonable Available Control Technology
<b>EU</b> .....	Emission Unit	<b>RAL</b> .....	Risk Assessment Level
<b>fps</b> .....	feet per second	<b>SCC</b> .....	Source Classification Code
<b>ft</b> .....	feet	<b>scfm</b> .....	standard cubic feet per minute
<b>GACT</b> .....	Generally Available Control Technology	<b>SIC</b> .....	Standard Industrial Classification
<b>GHG</b> .....	Greenhouse Gas	<b>SIP</b> .....	State Implementation Plan
<b>gpm</b> .....	gallons per minute	<b>SMAL</b> .....	Screening Model Action Levels
<b>gr</b> .....	grains	<b>SO<sub>x</sub></b> .....	sulfur oxides
<b>GWP</b> .....	Global Warming Potential	<b>SO<sub>2</sub></b> .....	sulfur dioxide
<b>HAP</b> .....	Hazardous Air Pollutant	<b>tph</b> .....	tons per hour
<b>hr</b> .....	hour	<b>tpy</b> .....	tons per year
<b>hp</b> .....	horsepower	<b>VMT</b> .....	vehicle miles traveled
<b>lb</b> .....	pound	<b>VOC</b> .....	Volatile Organic Compound
<b>lbs/hr</b> .....	pounds per hour		
<b>MACT</b> .....	Maximum Achievable Control Technology		
<b>µg/m<sup>3</sup></b> .....	micrograms per cubic meter		

Mr. Adam Barksdale  
President  
Holland 1916  
1340 Burlington Street  
North Kansas City, MO 64116

RE: New Source Review Permit - Project Number: 2012-12-020

Dear Mr. Barksdale:

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:gfk

Enclosures

c: Kansas City Regional Office  
PAMS File: 2012-12-020

Permit Number: