



## 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 here in.

Intermediate Operating Permit Number: OP2014-003  
Expiration Date: FEB 20 2019  
Installation ID: 047-0178  
Project Number: 2013-08-028

**Installation Name and Address**

Holland 1916  
1300 N. Burlington Street  
North Kansas City, MO 64116  
Clay County

**Parent Company's Name and Address**

Holland 1916  
1300 N. Burlington Street  
North Kansas City, MO 64116

**Installation Description:**

Holland 1916 produces metal nameplates and control panels for industrial application in North Kansas City, MO. The installation is a synthetic minor source of VOC, HAP, Glycol Ethers (20-10-0), Diethylene Glycol Monobutyl Ether (112-34-5), and Toluene (108-88-3).

FEB 21 2014

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Holland 1916 produces metal nameplates and control panels for industrial application in Clay county. Clay count is a maintenance area for ozone and an attainment area for all other criteria pollutants. The installation is a synthetic minor source of VOC, HAP, Glycol Ethers (20-10-0), Diethylene Glycol Monobutyl Ether (112-34-5), and Toluene (108-88-3).

This is an initial intermediate operating permit. The installation did not require an operating permit until they received NSR Permit 052013-005.

This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2; therefore, fugitive emissions are not counted toward major source applicability.

Reported Air Pollutant Emissions (tpy)					
Pollutants	2012	2011	2010	2009	2008
PM CON	0.06	-	-	-	-
PM <sub>10</sub>	0.06	-	-	-	-
PM <sub>2.5</sub>	0.06	-	-	-	-
SO <sub>x</sub>	-	-	-	-	-
NO <sub>x</sub>	-	0.07	0.07	-	-
VOC	36.03	3.54	3.54	-	-
CO	-	-	-	-	-
HAP	7.96	3.38	3.38	-	-
Toluene (108-88-3)	6.68	3.38	3.38	-	-
Isopropylbenzene (98-82-8)	0.77	-	-	-	-
Xylene (1330-20-7)	0.45	-	-	-	-
Methyl Isobutyl Ketone (108-10-1)	0.03	-	-	-	-
Ethylbenzene (100-41-4)	0.01	-	-	-	-
Naphthalene (91-20-3)	0.01	-	-	-	-
Phenol (108-95-2)	0.002	-	-	-	-
Styrene (100-42-5)	0.001	-	-	-	-

### 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 emission sources are also subject to the plantwide emission limitations.

Emission Source	Description	Applicable Requirements
EP02	Solvent Metal Cleaning	10 CSR 10-2.210
EP04	Paint Booth #1, two spray guns, 8 gal/hr each	072012-009, 10 CSR 10-6.220, 10 CSR 10-2.230

**EMISSION UNITS WITHOUT LIMITATIONS**

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. These emission sources are subject to the plantwide emission limitations.

<b>Emission Source</b>	<b>Description</b>
EP01	Natural Gas Curing Oven, 0.5 MMBtu/hr
	Natural Gas Bake Oven, 0.3 MMBtu/hr
	Natural Gas Space Heaters, 1.14 MMBtu/hr

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR and 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 PW001

10 CSR 10-6.020(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)

#### Emission Limitation:

The permittee shall emit less than 100.0 tons of VOC in any consecutive 12-month period from the entire installation as listed in Table 1.

**Table 1: Installation Equipment List**

Emission Source	Description
EP01	Natural Gas Curing Oven, 0.5 MMBtu/hr
	Natural Gas Bake Oven, 0.3 MMBtu/hr
	Natural Gas Space Heaters, 1.14 MMBtu/hr
EP02	Solvent Metal Cleaning
EP04	Paint Booth #1, two spray guns, 8 gal/hr each

#### Monitoring/Recordkeeping:

1. The permittee shall maintain records of the installation's monthly and 12-month rolling total VOC emissions using the calculation methodology approved within Attachment A.
2. The permittee shall retain MSDS or product specification sheets for each material used.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

#### Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the emission limitation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

### PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 052013-005, Issued May 13, 2013

#### Emission Limitations:

1. Special Condition 2.B: The permittee shall emit less than 10.0 tons individually of HAP in any consecutive 12-month period from the entire installation as listed in Table 1.
2. Special Condition 2.C: The permittee shall emit less than 5.0 tons of Glycol Ethers (20-10-0) in any consecutive 12-month period from the entire installation as listed in Table 1.

3. Special Condition 2.D: The permittee shall emit less than 25.0 tons of combined HAP in any consecutive 12-month period from the entire installation as listed in Table 1.

**Table 1: Installation Equipment List**

<b>Emission Source</b>	<b>Description</b>
EP01	Natural Gas Curing Oven, 0.5 MMBtu/hr
	Natural Gas Bake Oven, 0.3 MMBtu/hr
	Natural Gas Space Heaters, 1.14 MMBtu/hr
EP02	Solvent Metal Cleaning
EP04	Paint Booth #1, two spray guns, 8 gal/hr each

**Monitoring/Recordkeeping:**

1. Special Condition 2.E:
  - a) The permittee shall maintain records of the installation's monthly and 12-month rolling total individual HAP emissions using the calculation methodology approved within Attachments B and C.
  - b) The permittee shall maintain records of the installation's monthly and 12-month rolling total Glycol Ether (20-10-0) emissions using the calculation methodology approved within Attachments B and C.
  - c) The permittee shall maintain records of the installation's monthly and 12-month rolling total combined HAP emissions using the calculation methodology approved within Attachments B and C.
2. Special Condition 3.A: The permittee 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 or product specification sheets for each material used.

**Reporting:**

1. Special Condition 3.B: The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of any of the emission limitations.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

**PERMIT CONDITION PW003**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 072012-009, Issued July 23, 2012

**Operational Limitation:**

Special Condition 4: The permittee shall keep all solvents, coatings, and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent, coating, and cleaning solution containers.

**Reporting:**

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

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR and 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.

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 072012-009, Issued July 23, 2013 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
<b>Emission Unit</b>	<b>Description</b>
EP04	Paint Booth #1, two spray guns, 8 gal/hr each

**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from EP04 Paint Booth #1 any visible emissions with an opacity greater than 20 percent. [§6.220(3)(A)]
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent. [§6.220(3)(B)]

**Control Device Requirement:**

1. Special Condition 3.A: The permittee shall control PM emissions from EP04 Paint Booth #1 using particulate filters as specified in the permit application. The filters shall be operated and maintained in accordance with the manufacturer's specifications.
2. The particulate filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' personnel may easily observe them.
3. Special Condition 3.B: Replacement particulate filters for EP04 Paint Booth #1 shall be kept on hand at all times. The particulate filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
4. The permittee shall monitor and record the operating pressure drop across the particulate filters at least once every 24 hours of operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance specifications.
5. Special Condition 3.C: The permittee shall maintain an operating and maintenance log for the filters using Attachment D which shall include the following:
  - 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.

**Alternative Coatings:**

1. Special Condition 6.A: When considering the use of an alternative coating that is different than the material listed in the Application for Authority to Construct for NSR Permit 072012-009, the permittee shall calculate the potential emissions of each individual HAP contained within the alternative material.
2. The permittee shall obtain the individual HAP content of the alternative material from the material's MSDS or a product specification sheet for the material. The permittee shall retain a copy of the MSDS or product specification sheet.

3. Special Condition 6.B: The permittee shall seek approval from the Air Pollution Control Program prior to using an alternative material when calculations demonstrate the alternative material has potential individual HAP emission greater than the SMAL for the respective HAP.
4. A current list of SMALs is available at: <http://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>.
5. Special Condition 6.C: The permittee shall use Attachment E to perform the potential to emit calculations for each individual HAP.

**Recordkeeping and Reporting:**

1. Special Condition 7.A: The permittee 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 and/or production specification sheets for all materials used.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-2.210 Control of Emissions From Solvent Metal Cleaning	
Emission Unit	Description
EP02	Solvent Metal Cleaning

**Equipment Specifications:**

1. The permittee shall not use, sell, or offer for sale for use within Clay, Jackson and Platte Counties a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at 20°C (68°F) unless used for carburetor cleaning. [§2.210(3)(A)1.A]
2. The permittee shall not use, sell, or offer for sale for use within Clay, Jackson and Platte Counties a cold cleaning solvent for the purpose of carburetor cleaning with a vapor pressure greater than 5.0 mmHg (0.097 psi) at 20°C (68°F). [§2.210(3)(A)1.B]
3. The permittee may use an alternate method for reducing cold cleaning emissions if the permittee shows the level of emission control is equivalent to or greater than the requirements of §2.210(3)(A)1.A and B. This alternate method s be approved by the director and EPA. [§2.210(3)(A)1.C]
4. Each cold cleaner shall have a cover which prevents the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [§2.210(3)(A)1.D]
5. When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than 10 ft<sup>2</sup>, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems): [§2.210(3)(A)1.E]
  - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8°C (100°F); [§2.210(3)(A)1.E(I)]
  - b) The solvent is agitated; or [§2.210(3)(A)1.E(II)]
  - c) The solvent is heated. [§2.210(3)(A)1.E(III)]
6. Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [§2.210(3)(A)1.F]
7. If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [§2.210(3)(A)1.G]

8. Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [§2.210(3)(A)1.H]
9. A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [§2.210(3)(A)1.I]
10. Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or heated above 48.9°C (120°F) shall use one of the following control devices: [§2.210(3)(A)1.J]
  - a) A freeboard ratio of at least 0.75; [§2.210(3)(A)1.J(I)]
  - b) Water cover (solvent must be insoluble in and heavier than water); or [§2.210(3)(A)1.J(II)]
  - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems must receive approval from the director and EPA prior to their use. [§2.210(3)(A)1.J(III)]

**Operating Procedures:**

1. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [§2.210(3)(B)1.A]
2. Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back into the cold cleaner. [§2.210(3)(B)1.B]
3. Whenever a cold cleaner fails to perform within the operating procedures, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the operating procedures. [§2.210(3)(B)1.C]
4. Solvent leaks shall be repaired immediately or the cold cleaner shall be shut down until the leaks are repaired. [§2.210(3)(B)1.D]
5. Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the director and EPA: [§2.210(3)(B)1.E]
  - a) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or [§2.210(3)(B)1.E(I)]
  - b) Stored in closed containers for transfer to— [§2.210(3)(B)1.E(II)]
    - i) A contract reclamation service; or [§2.210(3)(B)1.E(II)(a)]
    - ii) A disposal facility approved by the director and EPA. [§2.210(3)(B)1.E(II)(b)]
6. Waste solvent shall be stored in closed containers only. [§2.210(3)(B)1.F]

**Operator and Supervisor Training:**

1. Only persons trained in at least the operational and equipment requirements specified in 10 CSR 10-2.210 for their particular solvent metal cleaning process shall be permitted to operate the equipment. [§2.210(3)(C)1]
2. The person who supervises any person who operates solvent cleaning equipment regulated by 10 CSR 10-2.210 shall receive equal or greater operational training than the operator. [§2.210(3)(C)2]
3. A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months. [§2.210(3)(C)3]
4. Training records shall be maintained per §2.210(4)(D) and (E). [§2.210(3)(C)4]

**Recordkeeping and Reporting:**

1. The permittee shall keep records of all types and amounts of solvent containing waste material from cleaning or degreasing operations transferred to either a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance. [§2.210(4)(A)]
2. All persons that use any solvent subject to the requirements of §2.210(3)(A)1.A or B shall maintain records which include for each purchase of cold cleaning solvent: [§2.210(4)(B)]
  - a) The name and address of the solvent supplier; [§2.210(4)(B)1]
  - b) The date of purchase; [§2.210(4)(B)2]
  - c) The type of solvent; and [§2.210(4)(B)3]
  - d) The vapor pressure of the solvent in mmHg at 20°C (68°F). [§2.210(4)(B)4]
3. All persons that sell or offer for sale any solvent subject to the requirements of §2.210(3)(A)1.A or B shall maintain records which include for each sale of cold cleaning solvent: [§2.210(4)(C)]
  - a) The name and address of the solvent purchaser; [§2.210(4)(C)1]
  - b) The date of sale; [§2.210(4)(C)2]
  - c) The type of solvent; [§2.210(4)(C)3]
  - d) The unit volume of solvent; [§2.210(4)(C)4]
  - e) The total volume of solvent; and [§2.210(4)(C)5]
  - f) The vapor pressure of the solvent measured in mmHg at 20°C (68°F). [§2.210(4)(C)6]
4. A record shall be kept of solvent metal cleaning training required by §2.210(3)(C). [§2.210(4)(D)]
5. All records required under §2.210(4)(A), (B), (C) and (D) shall be retained for five years and shall be made available to the director upon request. [§2.210(4)(E)]
6. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>	
10 CSR 10-2.230 Control of Emissions From Industrial Surface Coating Operations	
<b>Emission Unit</b>	<b>Description</b>
EP04	Paint Booth #1, two spray guns, 8 gal/hr each

**General Provisions:**

The permittee shall not emit into the atmosphere any VOC from any surface coating operation in excess of the following amounts:

Metal Parts Surface Coating Operation	VOC Emission Limit in lb/gal Coating (minus water and non-VOC)
Clear Coat	4.3
Extreme Performance Coat and Air-Dried Coating	3.5
Other Coatings	3.0

The VOC emission limit applies across all application areas, flash-off areas, and ovens used in an affected coating operation. [§2.210(3) and (4)]

**Compliance Requirements:**

1. Compliance with this regulation shall be determined by the following methods as applicable and appropriate: [§2.210(5)]
  - a) Compliance with VOC emission limits in lb/gal Coating (minus water and non-VOC) may be demonstrated using the method referenced in 10 CSR 10-6.030(14)(C) using the one-hour bake. Emission performance shall be on the basis of a daily volume-weighted average of all coatings used in each surface coating operation as delivered to the coating applicator(s) on a coating line. The daily volume-weighted average (DAVG<sub>VW</sub>) is calculated by the following formula:

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

Where:

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

B = lb VOC/gal coating (minus water and exempt solvents).

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

n = number of all coating used in a surface coating operation; or [§2.210(5)(B)1]

- b) Compliance with the emission limits may be demonstrated on pounds of VOC per gallon of coating solids basis. The VOC emission limits for the surface coating operation would then be:

<b>Metal Parts Surface Coating Operation</b>	<b>VOC Emission Limit in lb/gal Coating Solids</b>
Clear Coat	10.3
Extreme Performance Coat and Air-Dried Coating	6.6
Other Coatings	5.0

The VOC per gallon of coating solids for each coating used is then determined using the method referenced in 10 CSR 10-6.030(14)(C) using the one-hour bake. The composite daily volume-weighted average of pounds of VOC per gallon of coating solids as tested for in the actual coatings used is compared to the new compliance figure. Source operations on a coating line using coatings with a composite actual daily volume-weighted average value less than or equal to the VOC emission limits in lb/gal Coating Solids are in compliance with this regulation. [§2.210(5)(B)2]

- c) Alternatively the permittee may demonstrate compliance by documenting that each coating used is below the VOC emission limits.

**Recordkeeping:**

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include: [§2.210(6)(A)]
  - a) The type and the quantity of coatings used daily; [§2.210(6)(A)1]
  - b) The coating manufacturer's formulation data for each coating on forms provided or approved by the director; [§2.210(6)(A)2]
  - c) The type and quantity of solvents for coating, thinning, purging, and equipment cleaning used daily; [§2.210(6)(A)3]
  - d) All test results to determine capture and control efficiencies, transfer efficiencies, and coating makeup; [§2.210(6)(A)4]
  - e) The type and quantity of waste solvents reclaimed or discarded daily; [§2.210(6)(A)5]

- f) The quantity of pieces or materials coated daily; and [§2.210(6)(A)6]
- g) Any additional information pertinent to determine compliance. [§2.210(6)(A)7]
- 2. Records, such as daily production rates, may be substituted for actual daily coating use measurement provided the permittee submits a demonstration approvable by the director that these records are adequate for the purposes of this regulation. This will apply for all surface coating industries until the EPA issues national daily emissions recordkeeping protocols for specific industrial classifications. [§2.210(6)(B)]
- 3. The permittee 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.

**Reporting:**

- 1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the daily records indicate an exceedance of any of the VOC emission limitations.
- 2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR, 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 is only an excerpt from the regulation or code, and is 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. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exception:
    - i) The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality.
  - b) Yard waste, with the following exception:
    - i) The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit.
3. 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 permittee fails to comply with the conditions or any provisions of the permit.
4. Holland 1916 may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Holland 1916 fails to comply with the provisions or any condition of the open burning permit.
  - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)11, the director shall not issue an open burning permit unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Recordkeeping. NSPS CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of 40 CFR Part 60, Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with §60.2245 - §60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.

6. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by NSPS Appendix A – Test Methods, Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of NSPS Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

#### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

1. In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under §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 §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 §§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 18 months.

[§6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [§6.065(5)(C)(1) and (6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request.

[§6.065(5)(C)(1) and (6)(C)3.B]

### **10 CSR 10-6.080 Emission Standards for HAP and 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos**

1. The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M - *National Emission Standard for Asbestos*.
2. The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

1. The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on 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. The permittee may be required by the director to file additional reports.
3. 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.
4. The permittee shall submit a full EIQ for the 2014, 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.
5. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060(5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
6. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
7. The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.

8. The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
9. The permittee shall collect, record, and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

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

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

#### **10 CSR 10-6.170 Restriction of PM 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 PM emissions to go beyond the premises of origin in quantities that the PM may be found on surfaces beyond the property line of origin. The nature or origin of the PM 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 PM 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.

##### **Monitoring:**

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
2. The permittee shall maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
  - b) Should no violation of this regulation be observed during this period then:
    - i) The permittee may observe once every two weeks for a period of eight weeks.

- ii) If a violation is noted, monitoring reverts to weekly.
- iii) Should no violation of this regulation be observed during this period then-
  - (1) The permittee may observe once per month.
  - (2) If a violation is noted, monitoring reverts to weekly.
- c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

1. The permittee shall document all readings on Attachment G, or its equivalent, noting the following:
  - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
  - b) Whether equipment malfunctions contributed to an exceedance.
  - c) Any violations and any corrective actions undertaken to correct the violation.

**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 10-6.165 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 10-6.250 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 Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

**This requirement is only federally enforceable.**

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in 40 CFR Part 82, Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A - Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B - Servicing of MVACs. The term "motor vehicle" as used in 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, 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 promulgated pursuant to 40 CFR Part 82, Subpart G - Significant New Alternatives Policy Program.

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

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:

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

## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR and 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 Recordkeeping and Reporting Requirements**

1. Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2. Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program's 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, recordkeeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in 10 CSR 10-6.065(6)(C)7 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 §112(r)**

1. The permittee shall comply with the requirements of 40 CFR Part 68 - *Accidental Release Prevention Requirements*. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by §68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:
  - a) June 21, 1999;
  - b) Three years after the date on which a regulated substance is first listed under §68.130; or
  - c) The date on which a regulated substance is first present above a threshold quantity in a process.

**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 semi-annually (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's 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**

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 recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. 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)12 Responsible Official**

The application utilized in the preparation of this permit was signed by Adam Barksdale, President. 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 permittee 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 permittee 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**

1. This permit may be reopened for cause if:
  - a) The Missouri Department of Natural Resources 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,
  - b) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
    - i) The permit has a remaining term of less than three years;
    - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
    - iii) 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,
  - c) The Missouri Department of Natural Resources 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 F contains a list of abbreviations and acronyms used throughout this permit.





**Attachment C**  
 Plantwide 12-Monthly Rolling Total HAP Emissions Track Sheet

12-Month Rolling Total Emissions (ton/yr) = The sum of the most recent 12 months emissions (ton/month)

Date		12-Month Rolling Total Emissions (tpy) <sup>1</sup>				
Month	Year	Glycol Ethers (20-10-0)	Ind. HAP: CAS No.:	Ind. HAP: CAS No.:	Ind. HAP: CAS No.:	Combined HAP
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						

<sup>1</sup>12-Month Rolling Total Emissions = the sum of the most recent 12-month's Monthly Emissions. The permittee is in compliance with Permit Condition PW001 if 12-month rolling total emission of Glycol Ethers are less than 5.0 tpy, 12-month rolling total emissions of all other individual HAPs are less than 10.0 tpy, and 12-month rolling total emissions of Combined HAP are less than 25.0 tpy.





**Attachment F**  
Abbreviations and Acronyms

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



# 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 18 months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

## **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 August 9, 2013
2. 2012, 2011, and 2010 EIQs
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
4. FIRE: <http://cfpub.epa.gov/webfire/index.cfm?action=fire.SearchEmissionFactors>
5. Construction Permit 052013-005, Issued May 13, 2013
6. Construction Permit 072012-009, Issued July 23, 2012
7. Construction Permit 102002-007, Issued October 3, 2002

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

The Air Pollution Control Program has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable because the installation is in an ozone attainment area.

10 CSR 10-2.215 *Control of Emissions from Solvent Cleanup Operations* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-2.215(1)(B) states that the provisions of this rule do not apply to stationary sources at which cleaning solvent VOCs are emitted at less than 500 lb/day.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been applied within this permit. The installation exclusively combusts pipeline grade natural gas.

10 CSR 10-6.400 *Restriction of Emission of PM From Industrial Processes* is not applicable to the installation and has not been applied within this permit. EP04 Paint Booth #1 is required by Permit Condition 001 to operate a particulate filter which achieves greater than 90 percent PM control.

### Construction Permits

Construction Permit 052013-005, Issued May 13, 2013:

- ◆ This Section (6) NSR permit allows the installation to use two spray guns in a paint booth and increases the installation's VOC emission limit.
- ◆ Special Condition 1 states that the conditions of this NSR permit supersede Special Conditions 2 and 5 of NSR Permit 072012-009.
- ◆ Special Condition 2.A limits the installation to 250.0 tpy of VOC; however, in order to obtain this Intermediate Operating Permit, the installation has accepted a more restrictive limit of 100.0 tpy VOC (see Permit Condition PW001). If the installation wishes to emit more than 100.0 tpy of VOC the installation must apply for and receive a Part 70 Operating Permit.
- ◆ Special Conditions 2.B – E and 3 were included in this permit (see Permit Condition PW002).

Construction Permit 072012-009, Issued July 23, 2012:

- ◆ This Section (5) NSR permit allowed the installation to construct EP05 Paint Booth #2.
- ◆ EP05 Paint Booth #2 was used for about a year before the installation decided to dismantle and remove it from the installation.
- ◆ Special Condition 1 states that the conditions of this NSR permit supersede the special conditions of NSR Permit 102002-007.
- ◆ Special Conditions 2 and 5 were superseded by NSR Permit 052013-005.
- ◆ Special Conditions 3, 6, and 7 have been included within this permit (see Permit Condition 001).
- ◆ Special Condition 4 has been included within this permit (see Permit Condition PW003).

Construction Permit 102002-007, Issued October 3, 2002:

- ◆ This Section (5) NSR permit is for the initial construction of this installation and consisting of: EP01 Natural Gas Curing Oven and Bake Oven, EP02 Metal Solvent Cleaning, and EP04 Paint Booth #1.
- ◆ The special conditions of this NSR permit were superseded by NSR Permit 072012-009.

### NSPS Applicability

None.

### MACT Applicability

The installation is an area source of HAPs.

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. The installation does not use any solvent containing methylene chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5), or chloroform (67-66-3).

40 CFR Part 63, Subpart MMMM – *National Emission Standards for HAPs for Surface Coating of Miscellaneous Metal Parts and Products* is not applicable to the installation and has not been applied within this permit. The installation is not a major source of HAP.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for HAPs: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation and has not been applied within this permit. The installation does not use any materials containing compounds of chromium, lead, manganese, nickel, or cadmium.

**NESHAP Applicability**

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

**Other Regulatory Determinations**

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Condition 001). The proper operation of the control device demonstrates compliance with the opacity limits for the paint booth. The following emissions sources are also subject to this regulation, but they emit less than 0.5 pounds of particulate per hour and are deemed to be in compliance; therefore, no conditions were included within the permit for these sources: EP01 Natural Gas Curing Oven, Natural Gas Bake Oven, and Natural Gas Space Heaters.

10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is applicable to the installation but has not been applied within this permit. The installation exclusively combusts pipeline grade natural gas as is deemed in compliance with this regulation.

**Installation PTE**

Pollutant	Major Source Threshold (tpy)	Unconditioned PTE (tpy)	Conditioned PTE (tpy)
CO <sub>2</sub> e	100,000	994.19	n/a
VOC	100.0	327.82	<100.0
PM	n/a	3.67	n/a
PM <sub>10</sub>	100.0	3.71	n/a
PM <sub>2.5</sub>	100.0	3.71	n/a
NO <sub>x</sub>	100.0	0.83	n/a
CO	100.0	0.38	n/a
SO <sub>x</sub>	100.0	0.005	n/a
HAP	25.0	82.69	<25.0
Glycol Ethers	10.0	49.14	<5.0
Diethylene Glycol Monobutyl Ether (112-34-5)	10.0	31.89	<5.0
Toluene (108-88-3)	10.0	28.59	<10.0
Isopropylbenzene (98-82-8)	10.0	3.29	<10.0
Xylene (1330-20-7)	10.0	1.64	<10.0
Hexane (110-54-3)	10.0	0.01	<10.0

The installation’s unconditioned PTE is based upon 8,760 hours of annual operation.

EP04 Paint Booth #1 is the only emission source using a control device. The paint booth uses a particulate filter which was given a control efficiency of 95 percent in NSR Permit 102002-007.

Although the installation reported emissions of methyl isobutyl ketone, ethylbenzene, naphthalene, phenol, or styrene in their 2012 EIQ, these pollutants are no longer emitted by the installation and; therefore, do not appear in the installation’s PTE. The installation obtained NSR Permit 072012-009 to

operate EP05 Paint Booth #2. EP05 was installed and operated for approximately one year. The permittee dismantled EP05 in 2013 and has since removed the paint booth from the installation.

**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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

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Alana L. Rugen, P.E.  
Environmental Engineer III

Mr. Adam Barksdale  
Holland 1916  
1300 N. Burlington Street  
North Kansas City, MO 64116

Re: Holland 1916, 047-0178  
Permit Number: **OP2014-003**

Dear Mr. Barksdale:

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.

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 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 do not hesitate to contact David Buttig 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 time and attention to this matter.

Sincerely,

**AIR POLLUTION CONTROL PROGRAM**

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

MJS/ark

Enclosures

c: Kansas City Regional Office  
PAMS File: 2013-08-028