

Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

APR 18 2019

Mr. Kevin Mudge  
Holland 1916  
1340 Burlington Street  
North Kansas City, MO 64116

Re: Holland 1916, 047-0178  
Permit Number: OP2019-012

Dear Mr. Mudge

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

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:lsj

Enclosures

c: PAMS File: 2018-08-037



Recycled paper

# INTERMEDIATE STATE PERMIT TO OPERATE

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

**Intermediate Operating Permit Number:** OP2019-012  
**Expiration Date:** APR 18 2024  
**Installation ID:** 047-0178  
**Project Number:** 2018-08-037

**Installation Name and Address**

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

**Parent Company's Name and Address**

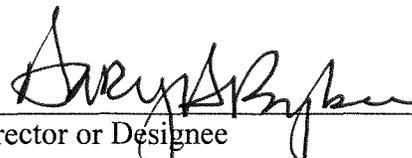
Holland 1916  
1300 N. Burlington Street  
North Kansas City, MO 64116

**Installation Description:**

Holland 1916 is a metal surface coating operation that produces metal nameplates and control panels for industrial application. The installation is located in Clay County, MO, an attainment/unclassifiable area for all criteria pollutants. Holland 1916 is a synthetic minor source of Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), Xylene (CAS No. 1330-20-7), Toluene (CAS No. 108-88-3), Ethylbenzene (CAS No. 100-41-4), Naphthalene (CAS No. 91-20-3), Cumene (CAS No. 98-82-8), and Methanol (CAS No. 67-56-1). The installation is not on the list of named installations found in 10 CSR 10-6.020(3)(B), Table 2. Fugitive emissions are not counted toward major source applicability.

APR 18 2019

Effective Date



Director or Designee  
Department of Natural Resources

## Table of Contents

<b>I. INSTALLATION EQUIPMENT LISTING .....</b>	<b>3</b>
EMISSION UNITS WITH LIMITATIONS .....	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS .....	3
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>4</b>
PERMIT CONDITION PW001.....	4
10 CSR 10-6.020(2)(1)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s) .....	4
PERMIT CONDITION PW002.....	5
10 CSR 10-6.060 Construction Permits Required.....	5
Construction Permit 052013-005, Issued May 13, 2013 .....	5
PERMIT CONDITION PW003.....	5
10 CSR 10-6.060 Construction Permits Required.....	5
Construction Permit 072012-009, Issued July 23, 2012.....	5
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>6</b>
PERMIT CONDITION 001.....	6
10 CSR 10-6.060 Construction Permits Required.....	6
Construction Permit 072012-009, Issued July 23, 2013.....	6
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants .....	6
PERMIT CONDITION 002.....	7
10 CSR 10-6.065 Voluntary Conditions .....	7
PERMIT CONDITION 003.....	8
10 CSR 10-6.060 Construction Permits Required.....	8
Construction Permit 072012-009, Issued July 23, 2013.....	8
PERMIT CONDITION 004.....	9
10 CSR 10-2.210 Control of Emissions From Solvent Metal Cleaning .....	9
PERMIT CONDITION 005.....	11
10 CSR 10-2.230 Control of Emissions From Industrial Surface Coating Operations.....	11
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>14</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>20</b>
<b>VI. ATTACHMENTS .....</b>	<b>24</b>
ATTACHMENT A.....	25
Plantwide VOC Emissions Tracking Sheet.....	25
ATTACHMENT B.....	26
Plantwide HAP Emissions Tracking Sheet .....	26
ATTACHMENT B (CONTINUED) .....	27
ATTACHMENT C.....	28
Inspection/Maintenance/Repair/Malfunction Log.....	28
ATTACHMENT D.....	29
Fugitive Emission Observations .....	29
ATTACHMENT E .....	30
Method 22 Visible Emissions Observations.....	30
ATTACHMENT F .....	31
Method 9 Opacity Observations.....	31
ATTACHMENT F (CONTINUED).....	32
ATTACHMENT G.....	33
Alternative Coating Potential-To-Emit (PTE) Worksheet .....	33

---

## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP02	Solvent Metal Cleaning
EP04	Paint Booth No.1 and Two Spray Guns [8 gallons per hour (gal/hr) each]

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

<u>Description of Emission Source</u>	
EP01A	Natural Gas Curing Oven, 0.5 million Btu per hour (mmBtu/hr)
EP01B	Natural Gas Bake Oven, 0.3 mmBtu/hr
EP01C	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 Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

### PERMIT CONDITION PW001

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

#### **Emission Limitation:**

The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) in any consecutive 12-month period from the entire installation.

#### **Monitoring, Reporting and Recordkeeping Requirements:**

1. The permittee shall maintain records of the installation's monthly and consecutive 12-month rolling total VOC emissions using the calculation methodology approved within Attachment A.
2. The permittee shall retain Safety Data Sheets (SDSs) or product specification sheets for each material used.
3. The permittee shall maintain all records required by this permit condition for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
4. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten (10) days after the end of the month during which records indicate an exceedance of the emission limitation.
5. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual 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. The permittee shall emit less than 10.0 tons of any individual Hazardous Air Pollutant (HAP) in any consecutive 12-month period from the entire installation. [Special Condition 2.B]
2. The permittee shall emit less than 5.0 tons of Glycol Ethers in any consecutive 12-month period from the entire installation. [Special Condition 2.C]
3. The permittee shall emit less than 25.0 tons of combined HAPs in any consecutive 12-month period from the entire installation. [Special Condition 2.D]

**Monitoring, Reporting and Recordkeeping Requirements:**

1. The permittee shall maintain records of the installation's monthly and consecutive 12-month rolling total individual HAP emissions using the calculation methodology approved within Attachment B. [Special Condition 2.E]
2. The permittee shall maintain records of the installation's monthly and consecutive 12-month rolling total Glycol Ether emissions using the calculation methodology approved within Attachment B. [Special Condition 2.E]
3. The permittee shall maintain records of the installation's monthly and consecutive 12-month rolling total combined HAP emissions using the calculation methodology approved within Attachment B. [Special Condition 2.E]
4. The permittee shall maintain all records required for 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 SDS or manufacturer specification sheets for each material used. [Special Condition 3.A]
5. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of the month during which records indicate an exceedance of the emissions limitation. [Special Condition 3.B]
6. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual 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:**

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. [Special Condition 4]

**Reporting Requirement:**

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

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect 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 No.1 and Two Spray Guns (8 gal/hr each)

**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)(1)]
2. Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)(2)]
3. Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

**Control Device Requirement:**

1. The permittee shall control Particulate Matter (PM) emissions from EP04 Paint Booth No.1 using particulate filters. The filters shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 3.A]
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. Replacement particulate filters for EP04 Paint Booth No.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). [Special Condition 3.B]

**Control Device Monitoring Requirements:**

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.

**Opacity Monitoring Requirements:**

1. Monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:

- i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
  - ii) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
2. If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
  3. Observations are only required when the emission units are operating and when the weather conditions allow.
  4. Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
  5. The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
  6. For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

**Reporting and Recordkeeping Requirements:**

1. The permittee shall maintain an operating and maintenance log for the filters using Attachment C which shall include the following: [Special Condition 3.C]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. The permittee shall maintain records of all observation results for each emission unit using Attachments E and F.
3. The permittee shall maintain all records required for this permit condition for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
4. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
5. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-6.065 Voluntary Conditions	
<b>Emission Unit</b>	<b>Description</b>
EP04	Paint Booth No.1 and Two Spray Guns (8 gal/hr each)

**Operational Limitations:**

1. The permittee shall operate the paint booth with all doorways into the booth closed during operation.
2. The permittee shall demonstrate airflow into the booth during operation at all fresh air vents using visual indicators.

**Monitoring Requirements:**

The permittee shall observe the visual indicators once per shift when the paint booth is operational, and shall maintain the visual indicators in proper working condition. Visual indicators shall include streamers, powder puff, smoke, or equivalent.

**Reporting and Recordkeeping Requirements:**

1. The permittee shall maintain an operating and maintenance log for permanently installed physical visual indicators (streamers or equivalent), which shall include the following information:
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. The permittee shall maintain all records required for this permit condition for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
3. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after a violation of the requirements and limitations of this permit condition.
4. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 072012-009, Issued July 23, 2013	
<b>Emission Unit</b>	<b>Description</b>
EP04	Paint Booth No.1 and Two Spray Guns (8 gal/hr each)

**Alternative Coatings:**

1. 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. [Special Condition 6A]
2. The permittee shall obtain the individual HAP content of the alternative material from the material's SDS or a product specification sheet for the material. The permittee shall retain a copy of the SDS or product specification sheet.
3. 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 Screening Model Action Limit (SMAL) for the respective HAP. [Special Condition 6.B]
4. A current list of SMALs is available at: <https://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>.
5. The permittee shall use the calculation methodology approved within Attachment G to perform the Potential-To-Emit (PTE) calculations for each individual HAP.

**Reporting and Recordkeeping Requirements:**

1. The permittee shall maintain all records required for this permit condition 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 SDSs and/or product specification sheets for all materials used.
2. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after a violation of the requirements of this permit condition.
3. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 004</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)I.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) I .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)I.A and B. This alternate methods be approved by the Director and EPA. [§2.210(3)(A) I .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)I.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)I.E]
  - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8°C(100°F); [§2.210(3)(A)I .E(I)]
  - b) The solvent is agitated; or [§2.210(3)(A)I.E(II)]
  - c) The solvent is heated. [§2.210(3)(A)I.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)I.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)I.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)I.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)l.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)l.J]
  - a) A freeboard ratio of at least 0.75; [§2.210(3)(A)l.J(n)]
  - b) Water cover (solvent must be insoluble in and heavier than water); or [§2.210(3)(A)l.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)l.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)l.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)l.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)l.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)l.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)l.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)l.E(I)]
  - b) Stored in closed containers for transfer to- [§2.210(3)(B)l.E(II)]
    - i) A contract reclamation service; or [§2.210(3)(B)l.E(II)(a)]
    - ii) A disposal facility approved by the Director and EPA. [§2.210(3)(B)l.E(II)(b)]
6. Waste solvent shall be stored in closed containers only. [§2.210(3)(B)l.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]

**Reporting and Recordkeeping Requirements:**

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 mm.Hg 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 to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after a violation of the requirements of this permit condition
  7. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 005</b>	
10 CSR 10-2.230 Control of Emissions From Industrial Surface Coating Operations	
<b>Emission Unit</b>	<b>Description</b>
EP02	Solvent Metal Cleaning

*Note: This regulation was amended by the State of Missouri on March 30, 2019 to include rule-specific definitions from other locations in the CSR and to organize the rule contents in a new standard format. The applicable emission limitations and requirements to this installation were not changed.*

**General Provisions:**

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

<b>Metal Parts Surface Coating Operation</b>	<b>VOC Emission Limit in Pounds Per Gallon (lb/gal) Coating (minus water and non-VOC)</b>
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. [§2.230(3) and (4)]

**Compliance Requirements:**

1. Compliance with this regulation shall be determined by the following methods as applicable and appropriate: [§2.230(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:

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

Where:

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

B = pounds (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 [§2.230(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 Pounds Per Gallon (lb/gal) Coating (minus water and non-VOC)</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 (1)-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. [§2.230(5)(B)2]

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

**Reporting and Recordkeeping Requirements:**

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include: [§2.230(6)(A)]
  - a) The type and the quantity of coatings used daily; [§2.230(6)(A)1]
  - b) The coating manufacturer's formulation data for each coating on forms provided or approved by the Director; [§2.230(6)(A)2] ,

- c) The type and quantity of solvents for coating, thinning, purging, and equipment cleaning used daily; [§2.230(6)(A)3]
  - d) All test results to determine capture and control efficiencies, transfer efficiencies, and coating makeup; [§2.230(6)(A)4]
  - e) The type and quantity of waste solvents reclaimed or discarded daily; [§2.230(6)(A)5]
  - f) The quantity of pieces or materials coated daily; and [§2.230(6)(A)6]
  - g) Any additional information pertinent to determine compliance. [§2.230(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. [§2.230(6)(B)]
  3. The permittee shall maintain all records required for this permit condition for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
  4. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after a violation of the requirements of this permit condition.
  5. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and annual 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 Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

### 10 CSR 10-6.045 Open Burning Requirements

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

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

1. In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

4. Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5. Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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

1. The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2. Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
3. The permittee shall submit full EIQ's per the schedule in the rule. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
4. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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

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

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

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

### **10 CSR 10-6.165 Restriction of Emission of Odors**

**This is a State Only permit requirement.**

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

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

#### **Emission Limitation:**

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

#### **Monitoring:**

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.

The permittee shall maintain the following monitoring schedule:

1. The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
2. Should no violation of this regulation be observed during this period then-
  - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
  - b) If a violation is noted, monitoring reverts to weekly.
  - c) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once per month.

- ii) If a violation is noted, monitoring reverts to weekly.
3. If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

1. Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2. Whether equipment malfunctions contributed to an exceedance.
3. 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 10-6.250 Asbestos Abatement Projects**

**Certification, Accreditation, and Business Exemption Requirements**

**This is a State Only permit requirement.**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
  - a) Monitoring methods outlined in 40 CFR Part 64;

- b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; 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.

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

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
- a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air

conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

## V. General Permit Requirements

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

### Permit Duration

#### 10 CSR 10-6.065, §(4)(C)1, §(5)(C)1.B, §(4)(E)2.C

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### General Record Keeping and Reporting Requirements

#### 10 CSR 10-6.065, §(4)(C)1 and §(5)(C)1.C

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (5)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of

emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit.
- 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.

#### **Risk Management Plan Under Section 112(r)**

##### **10 CSR 10-6.065 §(4)(C)1 and §(5)(C)1.D**

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

#### **General Requirements**

##### **10 CSR 10-6.065(4)(C)1.A**

- 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(5) and enforcement action for operating without a valid part 70 operating permit.

**Reasonably Anticipated Operating Scenarios**  
**10 CSR 10-6.065(4)(C)1.C**

There are no reasonably anticipated operating scenarios.

**Compliance Requirements**

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

## **Emergency Provisions**

### **10 CSR 10-6.065, §(4)(C)1 and §(5)(C)7**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

## **Off-Permit Changes**

### **10 CSR 10-6.065(4)(C)5**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

## **Responsible Official**

### **10 CSR 10-6.020(2)(R)34**

The application utilized in the preparation of this permit was signed by Kevin Mudge, Vice 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 owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the

change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

### **Reopening-Permit for Cause**

#### **10 CSR 10-6.065 §(4)(E)4 and §(5)(E)6.A(III)(a)-(c)**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;  
or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

### **Statement of Basis**

#### **10 CSR 10-6.065 §(4)(E)1.A and §(5)(E)1.C**

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 B**

Plantwide HAP Emissions Tracking Sheet

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

Material Used in EP02 or EP04 <sup>1</sup> (Name, Product No.)	Amount Used (gal)	Density <sup>2</sup> (lb/gal)	Individual HAP: (CAS No. _____)		Glycol Ethers		Hexane (CAS No. 110-54-3)		Combined HAP Content (%) <sup>3</sup>	Combined HAP Emissions (tons) <sup>4</sup>
			Content (%) <sup>3</sup>	Emissions (tons) <sup>4</sup>	Content (%) <sup>3</sup>	Emissions (tons) <sup>4</sup>	Content (%) <sup>3</sup>	Emissions (tons) <sup>4</sup>		

Natural Gas Combustion HAP Emissions (tons) <sup>5</sup> = (1.8 lb Hexane/MMscf or 1.885 lb Combined HAP/MMscf) x Current Monthly Natural Gas Usage (MMscf): _____ x 0.0005 (ton/lb)			
--	--	--	--

Previous Month's Consecutive 12-Month Rolling Total HAP Emissions (tons):						
Previous Year's Current Monthly HAP Emissions (tons):						
Current Monthly HAP Emissions (tons):						
Current Consecutive 12-Month Rolling Total HAP Emissions (tons) <sup>6</sup> :						

**Attachment B (continued)**

1. The permittee shall compare the list of chemicals within the material being used as obtained from the SDS to the list of HAPs at: <https://dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>. If the chemical is a HAP, the permittee must calculate its emissions on this attachment.
2. Obtained from the SDS for the material. If the specific gravity is provided instead, the density can be calculated using the following equation: Density (lb/gal) = Specific Gravity x 8.33 (lb/gal).
3. All percents are by weight. Obtained from the SDS for the material. If a range of values is provided, use the highest value in the range to demonstrate compliance. If the HAP content is provided in (lb/gal), the HAP content (% w/w) can be calculated using the following equation: HAP Content (% w/w) = HAP Content (lb/gal) / Density (lb/gal).
4. Gallons of Material Used x Density (lb/gal) x [Content (% w/w) / 100%] x 0.0005 (ton/lb) = Emissions (tons). If the HAP is also particulate matter, the permittee may include a transfer efficiency of 60% (w/w) and an overall capture and control of 95% (w/w).
5. Natural gas emission factors obtained from AP-42 Section 1.4 "Natural Gas Combustion" (July 1998)]. Individual HAPs from natural gas combustion other than hexane are not considered in this attachment. The current monthly natural gas usage includes usage from EP01A, EP01B, and EP01C.
6. Current Consecutive 12-Month Rolling Total HAP Emissions (tons) = Previous Month's Consecutive 12-Month Rolling Total HAP Emissions (tons) - Previous Year's Current Monthly HAP Emissions (tons) + Current Monthly HAP Emissions (tons)

\*The permittee shall include emissions from all Start-up, Shutdown and Malfunction conditions as reported under 10 CSR 10-6.050. Current Consecutive 12-Month Rolling Total HAP emissions of less than five (5.0) tons of Glycol Ethers, 10.0 tons of each individual HAP, and 25.0 tons of combined HAPs indicates compliance with Permit Condition PW002.

\*\*"gal" relates to gallons, "lb/gal" relates to pounds per gallon, "ton/lb" relates to tons per pound, "lb Hexane/MMscf" relates to pounds of hexane per million standard cubic feet and "lb Combined HAP/MMscf" relates to pounds of combined HAP per million standard cubic feet.





**Attachment E**

Method 22 Visible Emissions Observations					
Installation Name			Observer Name		
Location			Date		
Sky Conditions			Wind Direction		
Precipitation			Wind Speed		
Time			Emission unit		
Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.					
Minute	Seconds				Comments
	0	15	30	45	
Visible Emissions Yes (Y) or No (N)					
0					
1					
2					
3					
4					
5					
6					

\*If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.

**Attachment F**

Method 9 Opacity Observations		
Installation Name:	Sketch of the observer's position relative to the emission unit	
Emission Point:		
Emission Unit:		
Observer Name and Affiliation:		
Observer Certification Date:		
Method 9 Observation Date:		
Height of Emission Point:		
Time:	Start of observations	End of observations
Distance of Observer from Emission Point:		
Observer Direction from Emission Point:		
Approximate Wind Direction:		
Estimated Wind Speed:		
Ambient Temperature:		
Description of Sky Conditions (Presence and color of clouds):		
Plume Color:		
Approximate Distance Plume is Visible from Emission Point:		

**Attachment F (continued)**

Minute	Seconds				1-Minute Avg. % Opacity <sup>1</sup>	6-Minute Avg. % Opacity <sup>2</sup>	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Reading (% Opacity) <sup>3</sup>								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									

- 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
- 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
- Each 15-second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

Was the emission unit in compliance at the time of evaluation (yes or no)?

\_\_\_\_\_  
 Signature of Observer



## STATEMENT OF BASIS

### **Installation Description:**

Holland 1916 uses two High Volume Low Pressure (HVLP) paint guns on flat metal surfaces within a totally enclosed paint booth. The guns have a Maximum Hourly Design Rate (MHDR) of eight (8) gallons per hour (gal/hr) each and a particulate transfer efficiency of sixty 60% (w/w). The paint booth is equipped with fabric panel filters. The control system for spray-applied surface coating operations consisting of the paint booth and fabric panel filters achieves a nominal 95% (w/w) control efficiency. Additional operations to the spray-applied surface coating operation include solvent metal cleaning [MHDR one (1) (gal/hr)], one (1) natural gas fired baking oven (0.3 million Btu per hour, MMBtu/hr), one (1) natural gas fired curing oven (0.5 MMBtu/hr), and natural gas fired space heaters (1.14 MMBtu/hr). The installation has not been issued any construction permits since issuance of the last operating permit (OP2014-003). However, since issuance of OP2014-003, the need for additional operational limitations and monitoring requirements associated with the total enclosure were identified.

### **Voluntary Emission 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 becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

### **Addition of Voluntary Operational Limitations:**

In addition to voluntary emission limitations, the permittee has accepted voluntary operational limitations to ensure exemption to 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, under §6.400(1)(B)15. These voluntary operational limitations have been made federally enforceable for the first time with this operating permit under Permit Condition 002. Permit Condition 002 defines operational limitations, monitoring requirements and reporting/recordkeeping requirements to demonstrate that the capture system for Paint Booth No.1 captures 100% (w/w) of particulate overspray. Permit Condition 001 defines requirements for the captured emissions to be controlled by fabric filters. The capture and control system provides at least 95% (w/w) overall control of particulates.

### **Potential-To-Emit (PTE):**

In addition to the aforementioned information, emissions calculations were performed considering a percent cutting agent-to-paint of 50% (w/w), along with acetone as the cutting agent (exempt VOC), from information provided via phone by the installation. Emission factors for natural gas combustion were obtained from AP-42 Chapter 1.4, and data for materials used was supplied by the installation in the permit application. The supplied material information is presented in Table SB-1. In Table SB-1, all percents are by weight. In addition, material A-1005 (Barsol Solvent) is listed as a material used in EP02 only, a contradiction to the permit application. The installation informed the Air Pollution Control Program (APCP) after the application submittal that Material A-1005 is primarily used in EP02, and less than one cup per year is used in EP04 (for spray gun maintenance). As shown in Table SB-1, no Glycol Ethers are present in any material.



The PTE calculations are dependent on the information supplied in the permit application and is subject to change due to the allowed use of alternative materials in Permit Condition 003. That said, potential emissions of nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), and carbon monoxide (CO) equal the combined NO<sub>x</sub>, SO<sub>x</sub>, and CO emissions from EP01A, EP01B, and EP01C, respectively, under 8760 hours of operation per year. The PTE given for VOCs equals the conditioned PTE for VOCs.

In the case of particulate emissions, the only sources from the installation are EP01A (Natural Gas Curing Oven), EP01B (Natural Gas Bake Oven), EP01C (Natural Gas Space Heaters), and EP04 (Paint Booth No.1 and Two Spray Guns). In the case of EP04, no materials used contain HAPs. Therefore, particulate emissions are limited by either the maximum hours of operation in one year (8760 hours) or the 100 ton-per-year VOC limitation. The worst-case particulate emissions from EP04 occur when material WB-762 (Safety Gloss Safety Yellow) is exclusively used. Such worst-case particulate emissions are limited by the maximum hours of operation in one year. The amount of allowable VOC emissions remaining after EP04 is operated spraying exclusively WB-762 for 8760 hours is greater than the combined amount of VOCs emitted by EP01A, EP01B, and EP01C when operated 8760 hours per year. Therefore, the plantwide particulate PTE equals the sum of all unit-specific PTE for particulates.

In the case of individual HAP emissions, the individual HAP emissions from EP02 are many orders of magnitude greater than the individual HAP emissions from EP01A (Natural Gas Curing Oven), EP01B (Natural Gas Bake Oven), and EP01C (Natural Gas Space Heaters). Therefore, EP02 (Solvent Metal Cleaning) was only considered in calculations related to individual HAP emissions. The individual HAPs present in the materials used in EP02 include Xylene (CAS No. 1330-20-7), Toluene (CAS No. 108-88-3), Ethylbenzene (CAS No. 100-41-4), Naphthalene (CAS No. 91-20-3), Cumene (CAS No. 98-82-8), and Methanol (CAS No. 67-56-1). The worst-case scenario for Xylene emission occurs when material A5285 (Soak (Digital Resist)) is exclusively used, and its emission is limited by the 10 ton per year individual HAP limit. The worst-case scenario for Toluene emission occurs when A-1005 (Barsol Solvent) is exclusively used, and its emission is limited by the 10 ton per year individual HAP limit. The worst-case scenario for Ethylbenzene emission occurs when material A5285 [Soak (Digital Resist)] is exclusively used, and its emission is limited by the 10 ton per year individual HAP limit reached by another individual HAP within the same material (Xylene). The worst-case scenario for Naphthalene emission occurs when material A-5314 (Barsol A-5314) is exclusively used, and its emission is limited by the maximum number of hours of operation in one year. The worst-case scenario for Cumene emission occurs when material A5257 (A-5257 Soak) is exclusively used, and its emission is limited by the maximum number of hours of operation in one year. The worst-case scenario for Methanol emission occurs when material S-560 (S-560 Degreaser) is exclusively used, and its emission is limited by the maximum number of hours of operation in one year.

In the case of combined HAP emissions, the worst-case scenario from EP02 occurs when a combination of materials are used. Material A5285 [Soak (Digital Resist)] emits the highest amount of combined HAPs per hour (Xylene and Ethylbenzene). Since its use is limited to 5102 hours per year due to the individual HAP limit being reached for Xylene, another material can be used for the remaining hours in the year. The material with the second highest combined HAP emissions per hour is material A-1005 (Barsol Solvent). When material A5285 is used for 5102 hours and material A-1005 is used for 3658 hours, a total of 20.1 tons of combined HAPs are emitted per year. Since the worst-case combined HAP emissions from EP02 are well below the 25 ton per year limit, and the remaining combined HAP emissions allowed plantwide is less than the summation of combined HAP PTE for EP01A, EP01B, and EP1C, plantwide combined HAP PTE equals the sum of all unit-specific combined HAP PTE.

**Updated Air Pollutant Emissions for the Installation, tons per year**

Pollutants	Controlled PTE With Limiting Conditions	Reported Emissions				
		2017 <sup>1,2,3</sup>	2016	2015	2014	2013 <sup>1,4</sup>
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	4.68	1.76	0.0912	0.0754	0.0923	0.118
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	4.68	1.76	0.0912	0.0754	0.0923	0.118
Sulfur Oxides (SO <sub>x</sub> )	0.00500	0.000600	0.000900	0.000800	0.00130	0.00
Nitrogen Oxides (NO <sub>x</sub> )	0.833	0.0931	0.139	0.131	0.211	0.00
Volatile Organic Compounds (VOC)	<100.	17.2	23.3	26.5	31.1	29.1
Carbon Monoxide (CO)	0.700	0.0396	0.0590	0.0556	0.0898	0.00
Hazardous Air Pollutants (HAPs)	20.1	0.00190	2.42	4.02	5.53	6.91
Xylene (CAS No. 1330-20-7)	<10.0	0.00	0.00	0.00	0.00	0.468
Toluene (CAS No. 108-88-3)	<10.0	2.31	1.76	3.17	4.46	5.66
Ethylbenzene (CAS No. 100-41-4)	2.41	0.00	0.00	0.00	0.00	0.0307
Naphthalene (CAS No. 91-20-3)	2.50	0.674	0.658	0.846	1.07	0.0701
Cumene (CAS No. 98-82-8)	1.25	0.00	0.00	0.00	0.00	0.00
Methanol (CAS No. 67-56-1)	0.0388	0.00	0.00	0.00	0.00	0.0709

1. Reported individual HAPs were not always associated with EP02, which is inconsistent with the information supplied in the permit application.
2. Individual HAPs reported as VOCs
3. Inconsistent particulate emissions in comparison to previous four years
4. Isopropyl benzene, methyl isobutyl ketone, phenol, and styrene also reported (from now dismantled paint booth)

### **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 17, 2018;
- 2) 2017 Emissions Inventory Questionnaire, received April 20, 2018;
- 3) 2016 Emissions Inventory Questionnaire, received April 10, 2017;
- 4) 2015 Emissions Inventory Questionnaire, received March 31, 2016;
- 5) 2014 Emissions Inventory Questionnaire, received April 22, 2015;
- 6) 2013 Emissions Inventory Questionnaire, received April 01, 2014;
- 7) Intermediate State Permit To Operate (OP2014-003), issued February 21, 2014;
- 8) Construction Permit No. 052013-005, issued May 13, 2013;
- 9) Construction Permit No. 072012-009, issued July 23, 2012; and
- 10) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

10 CSR 10-6.065, *Voluntary Conditions* is applicable to the installation to ensure exemption to 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*, under §6.400(1)(B)15. The permittee accepts voluntary operational, monitoring, and reporting/recordkeeping requirements to demonstrate that the capture and control system for Paint Booth No.1 controls at least 95% of particulate overspray provided the requirements within Permit Conditions 001 and 002 are met.

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

The APCP 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* was rescinded by the State of Missouri on November 30, 2015. The regulation remains in Missouri's State Implementation Plan (SIP) and remains an applicable federal requirement. This is a federal only requirement. This regulation is not applicable to the installation and has not been applied within this permit. The installation exclusively combusts pipeline grade natural gas.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* 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 by exemption under §6.400(1)(B)15. EP04 Paint Booth No.1 is required by Permit Condition 002 to use visual indicators to ensure negative pressure within the paint booth and by Permit Condition 003 to operate a particulate filter which achieves a nominal overall 95% capture and control of particulate matter.

10 CSR 10-6.405, *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is not applicable to the installation because the installation exclusively combusts pipeline grade natural gas.

### **Construction Permit History**

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 ton/yr VOC (see Permit Condition PW001)

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

- ◆ This Section (5) NSR permit allowed the installation to construct EP05 Paint Booth No.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.

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

- ◆ This Section (5) NSR permit is for the initial construction of this installation and encompassed the construction of: EP01 (Natural Gas Curing Oven), EP02 (Solvent Metal Cleaning), and EP04 (Paint Booth No.1).

### **New Source Performance Standards (NSPS) Applicability**

None.

### **Maximum Achievable Control Technology (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.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None.

**Greenhouse Gas Emissions**

There are no currently issued Greenhouse Gas regulations applicable to this installation. Missouri regulations do not require the installation to report CO<sub>2</sub>e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub>e emissions were not included within this permit.

**Other Regulatory Determinations**

None.

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

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

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

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

## **Response to Public Comments**

The draft Intermediate Operating Permit for Holland 1916 (047-0178) was placed on public notice as of March 6, 2019 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>.

No comments were received.