



## 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:** OP2009-033  
**Expiration Date:** DEC 01 2014  
**Installation ID:** 071-0131  
**Project Number:** 2008-02-016

**Installation Name and Address**

Huggins Metal Finishing, Inc. D/B/A Sullivan Precision Metal Finishing  
995 N. Service Rd. West  
Sullivan, MO 63080  
Franklin County

**Parent Company's Name and Address**

Huggins Metal Finishing, Inc. D/B/A Sullivan Precision Metal Finishing  
995 N. Service Rd. West  
Sullivan, MO 63080  
Franklin County

**Installation Description:**

Sullivan Precision Metal Finishing, located in Sullivan, Missouri, has been processing aluminum parts for the aerospace industry since 1978. Pre-fabricated aluminum parts are received from manufacturers. These parts, consisting mostly of helicopter and aircraft pieces, are treated at the facility. Some of the pieces are anodized and others are painted. The finished pieces are then shipped out to assembly plants.

DEC 02 2009

Effective Date

  
Director or Designee  
Department of Natural Resources

---

---

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>3</b>
INSTALLATION DESCRIPTION .....	3
EMISSION UNITS WITH LIMITATIONS .....	3
EMISSION UNITS WITHOUT LIMITATIONS.....	3
DOCUMENTS INCORPORATED BY REFERENCE.....	4
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>5</b>
PERMIT CONDITION PW001 .....	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s) .....	5
PERMIT CONDITION PW002 .....	6
Construction Permit 1297-022, Issued January 27,1998.....	6
PERMIT CONDITION PW003 .....	6
Construction Permit 122001-009, Issued November 29, 2001 .....	6
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>7</b>
EU0010 AND EU0020 – BOILERS .....	7
PERMIT CONDITION (EU0010, EU0020)-001.....	7
10 CSR 10-5.030 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating .....	7
EU0030 AND EU0040 – CHROMIC ACID ANODIZING TANKS .....	7
PERMIT CONDITION (EU0030, EU0040)-001.....	8
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations .....	8
40 CFR Part 63, Subpart N, National Emission Standards for Hazardous Air Pollutants for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks .....	8
EU0050, EU0060, EU0070, EU0080, AND EU0090 – PAINT BOOTHS.....	16
PERMIT CONDITION (EU0050, EU0060, EU0070, EU0080, EU0090) - 001.....	16
10 CSR 10-5.295 Control of Emissions From Aerospace Manufacture and Rework Facilities .....	16
Construction Permit 122001-009, Issued November 29, 2001 .....	16
Construction Permit 052005-028, Issued May 27, 2005 .....	16
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>21</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>27</b>
<b>VI. ATTACHMENTS .....</b>	<b>31</b>
ATTACHMENT A.....	32
ATTACHMENT B .....	33
ATTACHMENT C .....	34
ATTACHMENT D.....	35

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Sullivan Precision Metal Finishing, located in Sullivan, Missouri, has been processing aluminum parts for the aerospace industry since 1978. Pre-fabricated aluminum parts are received from manufacturers. These parts, consisting mostly of helicopter and aircraft pieces, are treated at the facility. Some of the pieces are anodized and others are painted. The finished pieces are then shipped out to assembly plants.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	---	---	---	18.10	---	---	0.4789
2007	0.023	---	0.408	6.44	0.072	---	1.8168
2006	0.092	---	1.577	23.37	0.266	---	2.1624
2005	0.090	---	1.580	0.31	0.270	---	8.7955
2004	0.001	---	0.014	19.39	0.012	---	--

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	0.5 MMBTU/hr Propane Boiler SCC 10201002 (EP05)
EU0020	0.5 MMBTU/hr Natural Gas Boiler SCC 10200603 (EP05)
EU0030	16-foot Chromic Acid Anodizing Tanks (EP06)
EU0040	32-foot Chromic Acid Anodizing Tanks (EP06)
EU0050	Paint Booth 1 (EP07)
EU0060	Paint Booth 2 (EP07)
EU0070	Paint Booth 3 (EP07)
EU0080	Paint Booth 4 (EP07)
EU0090	Paint Booth 5 (EP07)

### 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.

None.

---

---

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

1. Construction Permit 1297-022
2. Missouri Department of Natural Resources Air Pollution Control Program Revision Letter for Construction Permit 1297-022 Dated January 6, 1998
3. Air Pollution Control Program Revision Letter for Construction Permit 1297-022 Dated January 27, 1998
4. Construction Permit 122001-009
5. Construction Permit 102004-003
6. Construction Permit 052005-028
7. O&M Plan required by 40 CFR Part 63, Subpart N

---

---

## 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 as of the date that this permit is issued.

<p style="text-align: center;"><b>PERMIT CONDITION PW001</b></p>
--

<p style="text-align: center;">10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)</p>
--

**Emission Limitation:**

1. The permittee shall emit less than 100 tons of volatile organic compounds (VOC) from this installation in any consecutive 12-month period.
2. The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) from this installation in any consecutive 12-month period.
3. The permittee shall emit less than 25 tons of combined hazardous air pollutants from this installation in any consecutive 12-month period.

**Monitoring:**

1. The permittee shall monitor the monthly amount of VOC containing materials used at the installation.
2. The permittee shall monitor the monthly amount and type of HAP containing materials used at the installation.

**Recordkeeping:**

1. The permittee shall record the monthly total of VOC emissions and the sum of the most recent consecutive 12-month totals in tons from this installation. (See Attachment A)
2. The permittee shall record the monthly total of individual and combined HAP emissions from this installation and the sum of the most recent consecutive 12-month totals in tons. (See Attachments B and C)
3. All records shall be kept on-site for a minimum of five years and made available to the Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

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

---

---

**PERMIT CONDITION PW002**

Construction Permit 1297-022, Issued January 27, 1998  
Revision Letter for Construction Permit 1297-022 Dated January 6, 1998  
Revision Letter for Construction Permit 1297-022 Dated January 27, 1998

**Reporting:**

Sullivan Precision Metal Finishing will report annually or as part of their annual operating permit certification, the results of their research for methods (e.g. pollution prevention, material substitution, process change, economical control, etc.) to reduce the off-property concentrations of HAPs indicated to be above the acceptable ambient levels shown in Table 2: Screen3 Results of Air Construction Permit 1297-022.

---

---

**PERMIT CONDITION PW003**

Construction Permit 122001-009, Issued November 29, 2001

**Work Practice Standard:**

Sullivan Precision Metal Finishing shall keep all coatings, primers, topcoats and solvents in sealed containers whenever the materials are not in use. Sullivan Precision Metal Finishing shall provide and maintain suitable, easily read, permanent markings on all coating, primer, topcoat and solvent containers used with this equipment.

**Reporting:**

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

### 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 as of the date that this permit is issued.

<b>EU0010 AND EU0020 – BOILERS</b>			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0010	0.5 MMBTU/hr Propane Boiler SCC 10201002	Model # U45518A 01-076 B26-30 RM7800L M35FM	EP05
EU0020	0.5 MMBTU/hr Natural Gas Boiler SCC 10200603	Model # U30656A B26304P170-M20-R1	EP05

<b>PERMIT CONDITION (EU0010, EU0020)-001</b>
10 CSR 10-5.030 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

**Emission Limitation:**

The permittee shall not emit particulate matter in excess of 0.40 pounds per million BTU of heat input.

**Operational Limitation/Equipment Specifications:**

EU0010 and EU0020 shall be limited to burning propane (liquefied petroleum gas) and pipeline grade natural gas.

**Monitoring/Record Keeping:**

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment D).
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

**Reporting:**

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

<b>EU0030 AND EU0040 – CHROMIC ACID ANODIZING TANKS</b>			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0030	16 ft. Chromic Acid Anodizing Tank	N/A	EP06
EU0040	32 ft. Chromic Acid Anodizing Tank	N/A	EP06

**PERMIT CONDITION (EU0030, EU0040)-001**

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations  
40 CFR Part 63, Subpart N, National Emission Standards for Hazardous Air Pollutants for Chromium  
Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

The following conditions apply to decorative chromium electroplating tanks using a chromic acid bath and chromium anodizing tanks located at a minor facility that uses an add-on air pollution control device/control technique.

**Emission Limitation:**

- 1) The emission limitations in this section apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for affected sources subject to this subpart. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by paragraph §63.342(f) must be followed during malfunctions. (§63.342(b)(1))
- 2) **If a chemical fume suppressant containing a wetting agent is used:** During tank operation, each owner or operator of an existing, new, or reconstructed affected source shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the surface tension of the electroplating or anodizing bath contained within the affected source to exceed 45 dynes per centimeter (dynes per centimeter) ( $3.1 \times 10^{-3}$  pound-force per foot [lbf/ft]) as measured by a stalagmometer or 35 dynes per centimeter (dynes per centimeter) ( $2.4 \times 10^{-3}$  pound-force per foot [lbf/ft]) as measured by a tensiometer at any time during operation of the tank. (§63.342(d)(2))
- 3) The standards in this section that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent. (§63.342(g))

**Work Practice Standards**

- 1) The work practice standards of this section address operation and maintenance practices. All owners or operators subject to the standards in paragraphs §63.342(d) of this section are subject to these work practice standards. (§63.342(f))
  - A) At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by paragraph (f)(3) of this section. (§63.342(f)(1)(i))
  - B) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by paragraph (f)(3) of this section. (§63.342(f)(1)(ii))
  - C) Operation and maintenance requirements established pursuant to Section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards. (§63.342(f)(1)(iii))
- 2) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source. (§63.342(f)(2)(i))
- 3) Based on the results of a determination made under paragraph (f)(2)(i) of this section, the Administrator may require that an owner or operator of an affected source make changes to the operation and maintenance plan required by paragraph (f)(3) of this section for that source. Revisions may be required if the Administrator finds that the plan: (§63.342(f)(2)(ii))

- 
- A) Does not address a malfunction that has occurred; (§63.342(f)(2)(ii)(A))
  - B) Fails to provide for the operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or (§63.342(f)(2)(ii)(B))
  - C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable. (§63.342(f)(2)(ii)(C))
- 4) *Operation and maintenance plan.* The owner or operator of an affected source subject to the work practices of paragraph §63.342(f) of this section shall prepare an operation and maintenance plan to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's title V permit, if and when a title V permit is required. The plan shall include the following elements: (§63.342(f)(3)(i))
- A) The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment; (§63.342(f)(3)(i)(A))
  - B) For sources using an add-on air pollution control device or monitoring equipment to comply with this subpart, the plan shall incorporate the work practice standards for that device or monitoring equipment, as identified in Table 1 of this section, if the specific equipment used is identified in Table 1 of this section; (§63.342(f)(3)(i)(B))
  - C) If the specific equipment used is not identified in Table 1 of this section, the plan shall incorporate proposed work practice standards. These proposed work practice standards shall be submitted to the Administrator for approval as part of the submittal required under §63.343(d); (§63.342(f)(3)(i)(C))
  - D) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and (§63.342(f)(3)(i)(D))
  - E) The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions. (§63.342(f)(3)(i)(E))
- 5) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. (§63.342(f)(3)(ii))
- 6) Recordkeeping associated with the operation and maintenance plan is identified in §63.346(b). Reporting associated with the operation and maintenance plan is identified in §63.347(g) and (h) and paragraph (f)(3)(iv) of this section. (§63.342(f)(3)(iii))

- 
- 7) If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by paragraph (f)(3)(i) of this section, the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator. (§63.342(f)(3)(iv))
  - 8) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for a period of 5 years after each revision to the plan. (§63.342(f)(3)(v))
  - 9) To satisfy the requirements of paragraph (f)(3) of this section, the owner or operator may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section. (§63.342(f)(3)(vi))

**Monitoring and Testing Requirements:**

- 1) *Performance test requirements.* Performance tests shall be conducted using the test methods and procedures in this section and §63.7. Performance test results shall be documented in complete test reports that contain the information required by paragraphs (a)(1) through (a)(9) of this section. The test plan to be followed shall be made available to the Administrator prior to the testing, if requested. (§63.344(a))
  - A) A brief process description; (§63.344(a)(1))
  - B) Sampling location description(s); (§63.344(a)(2))
  - C) A description of sampling and analytical procedures and any modifications to standard procedures; (§63.344(a)(3))
  - D) Test results; (§63.344(a)(4))
  - E) Quality assurance procedures and results; (§63.344(a)(5))
  - F) Records of operating conditions during the test, preparation of standards, and calibration procedures; (§63.344(a)(6))
  - G) Raw data sheets for field sampling and field and laboratory analyses; (§63.344(a)(7))
  - H) Documentation of calculations; (§63.344(a)(8))
  - I) Any other information required by the test method. (§63.344(a)(9))
- 2) *Establishing site-specific operating parameter values.* All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. (§63.344(d)(2))
- 3) *Monitoring to demonstrate continuous compliance.* The owner or operator of an affected source subject to the emission limitations of this subpart shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The monitoring

---

required to demonstrate continuous compliance with the emission limitations is identified in this section for the air pollution control techniques expected to be used by the owners or operators of affected sources. (§63.343(c))

- 4) During the initial performance test, the owner or operator of an affected source complying with the emission limitations in §63.342 through the use of a wetting agent in the electroplating or anodizing bath shall determine the outlet chromium concentration using the procedures in §63.344(c). The owner or operator shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B, appendix A of this part, setting the maximum value that corresponds to compliance with the applicable emission limitation. In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes per centimeter as measured by a stalagmometer or 35 dynes per centimeter as measured by a tensiometer as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. However, the owner or operator is exempt from conducting a performance test only if the criteria of paragraph (b)(2) of this section are met. (§63.343(c)(5)(i))
- 5) On and after the date on which the initial performance test is required to be completed under §63.7, except for hard chromium electroplaters and chromium anodizing operations in California which have until January 25, 1998, the owner or operator of an affected source shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected source at a surface tension greater than the value established during the performance test, or greater than 45 dynes per centimeter as measured by a stalagmometer or 35 dynes per centimeter as measured by a tensiometer if the owner or operator is using this value in accordance with paragraph (c)(5)(i) of this section, shall constitute noncompliance with the standards. The surface tension shall be monitored according to the following schedule: (§63.343(c)(5)(ii))
  - A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part. (§63.343(c)(5)(ii)(A))
  - B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation. (§63.343(c)(5)(ii)(B))
  - C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (c)(5)(ii)(B) of this section. For example, if an owner or operator had been monitoring an affected source once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation. (§63.343(c)(5)(ii)(C))

- 
- 6) Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of paragraphs (c)(5)(ii) (B) and (C) of this section. (§63.343(c)(5)(iii))
  - 7) The surface tension of electroplating and anodizing baths shall be measured using Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks used at Decorative Chromium Electroplating and Anodizing Facilities," appendix A of this part. This method should also be followed when wetting agent type or combination wetting agent/foam blanket type fume suppressants are used to control chromium emissions from a hard chromium electroplating tank and surface tension measurement is conducted to demonstrate continuous compliance. (§63.344(d)(3))

**Recordkeeping:**

- 1) All records shall be maintained for a period of 5 years in accordance with §63.10(b)(1). (§63.346(c))
- 2) The owner or operator of an affected source subject to the provisions of this subpart shall maintain the following records for such source: (§63.346(b))
  - A) Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of § 63.342(f) and Table 1 of § 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. (§63.346(b)(1))
  - B) Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; (§63.346(b)(2))
  - C) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; (§63.346(b)(3))
  - D) Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; (§63.346(b)(4))
  - E) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by § 63.342(f)(3); (§63.346(b)(5))
  - F) Test reports documenting results of all performance tests; (§63.346(b)(6))
- 3) Records of monitoring data required by § 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; (§63.346(b)(8))
- 4) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; (§63.346(b)(9))
- 5) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; (§63.346(b)(10))
- 6) The total process operating time of the affected source during the reporting period; (§63.346(b)(11))
- 7) Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under §63.10(f); and (§63.346(b)(15))

- 
- 
- 8) All documentation supporting the notifications and reports required by §63.9, §63.10, and §63.347. (§63.346(b)(16))
  - 9) For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing bath. (§63.346(b)(13))

**Reporting:**

- 1) The owner or operator of each affected source subject to these standards shall fulfill all reporting requirements outlined in this section and in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A as identified in Table 1 of this subpart. These reports shall be made to the Administrator at the appropriate address as identified in §63.13 or to the delegated State authority. (§63.347(a))
  - A) Reports required by subpart A of this part and this section may be sent by U.S. mail, fax, or by another courier. (§63.347(a)(1))
    - i) Submittals sent by U.S. mail shall be postmarked on or before the specified date. (§63.347(a)(1)(i))
    - ii) Submittals sent by other methods shall be received by the Administrator on or before the specified date. (§63.347(a)(1)(ii))
  - B) If acceptable to both the Administrator and the owner or operator of an affected source, reports may be submitted on electronic media. (§63.347(a)(2))
- 2) *Initial notifications.* The owner or operator of an affected source that has an initial startup before January 25, 1995, shall notify the Administrator in writing that the source is subject to this subpart. The notification shall be submitted no later than 180 calendar days after January 25, 1995, and shall contain the following information: (§63.347(c)(1))
  - A) The name, title, and address of the owner or operator; (§63.347(c)(1)(i))
  - B) The address (i.e., physical location) of each affected source; (§63.347(c)(1)(ii))
  - C) A statement that subpart N of this part is the basis for this notification; (§63.347(c)(1)(iii))
  - D) Identification of the applicable emission limitation and compliance date for each affected source; (§63.347(c)(1)(iv))
  - E) A brief description of each affected source, including the type of process operation performed; (§63.347(c)(1)(v))
  - F) For sources performing hard chromium electroplating, the maximum potential cumulative potential rectifier capacity; (§63.347(c)(1)(vi))
  - G) For sources performing hard chromium electroplating, a statement of whether the affected source(s) is located at a small or a large, hard chromium electroplating facility and whether this will be demonstrated through actual or maximum potential cumulative rectifier capacity; (§63.347(c)(1)(vii))
  - H) For sources performing hard chromium electroplating tanks, a statement of whether the owner or operator of an affected source(s) will limit the maximum potential cumulative rectifier capacity in accordance with §63.342(c)(2) such that the hard chromium electroplating facility is considered small; (§63.347(c)(1)(viii))
  - I) A statement of whether the affected source is located at a major source or an area source as defined in §63.2. (§63.347(c)(1)(ix))
- 3) *Notification of performance test.* The owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Administrator to have an observer present

---

during the test. Observation of the performance test by the Administrator is optional.  
(§63.347(d)(1))

- 4) In the event the owner or operator is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) apply. (§63.347(d)(2))
- 5) *Notification of compliance status.* (1) A notification of compliance status is required each time that an affected source becomes subject to the requirements of this subpart. (§63.347(e)(1))
- 6) If the State in which the source is located has not been delegated the authority to implement the rule, each time a notification of compliance status is required under this part, the owner or operator of an affected source shall submit to the Administrator a notification of compliance status, signed by the responsible official (as defined in §63.2) who shall certify its accuracy, attesting to whether the affected source has complied with this subpart. If the State has been delegated the authority, the notification of compliance status shall be submitted to the appropriate authority. The notification shall list for each affected source: (§63.347(e)(2))
  - A) The applicable emission limitation and the methods that were used to determine compliance with this limitation; (§63.347(e)(2)(i))
  - B) If a performance test is required by this subpart, the test report documenting the results of the performance test, which contains the elements required by §63.344(a), including measurements and calculations to support the special compliance provisions of §63.344(e) if these are being followed; (§63.347(e)(2)(ii))
  - C) The type and quantity of hazardous air pollutants emitted by the source reported in mg/dscm or mg/hr if the source is using the special provisions of §63.344(e) to comply with the standards. (If the owner or operator is subject to the construction and reconstruction provisions of §63.345 and had previously submitted emission estimates, the owner or operator shall state that this report corrects or verifies the previous estimate.) For sources not required to conduct a performance test in accordance with § 63.343(b), the surface tension measurement may fulfill this requirement; (§63.347(e)(2)(iii))
  - D) For each monitored parameter for which a compliant value is to be established under § 63.343(c), the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit; (§63.347(e)(2)(iv))
  - E) The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements, if methods differ from those identified in this subpart; (§63.347(e)(2)(v))
  - F) A description of the air pollution control technique for each emission point; (§63.347(e)(2)(vi))
  - G) A statement that the owner or operator has completed and has on file the operation and maintenance plan as required by the work practice standards in §63.342(f); (§63.347(e)(2)(vii))
  - H) If the owner or operator is determining facility size based on actual cumulative rectifier capacity in accordance with §63.342(c)(2), records to support that the facility is small. For existing sources, records from any 12-month period preceding the compliance date shall be used or a description of how operations will change to meet a small designation shall be provided. For new sources, records of projected rectifier capacity for the first 12-month period of tank operation shall be used; (§63.347(e)(2)(viii))
  - I) A statement by the owner or operator of the affected source as to whether the source has complied with the provisions of this subpart. (§63.347(e)(2)(ix))

- 
- 7) For sources required to conduct a performance test by §63.343(b), the notification of compliance status shall be submitted to the Administrator no later than 90 calendar days following completion of the compliance demonstration required by §63.7 and §63.343(b). (§63.347(e)(3))
  - 8) For sources that are not required to complete a performance test in accordance with §63.343(b), the notification of compliance status shall be submitted to the Administrator no later than 30 days after the compliance date specified in §63.343(a), except the date on which sources in California shall monitor the surface tension of the anodizing bath is extended to January 25, 1998. (§63.347(e)(4))
  - 9) *Reports of performance test results.* (1) If the State in which the source is located has not been delegated the authority to implement the rule, the owner or operator of an affected source shall report to the Administrator the results of any performance test conducted as required by §63.7 or §63.343(b). If the State has been delegated the authority, the owner or operator of an affected source should report performance test results to the appropriate authority. (§63.347(f)(1))
  - 10) Reports of performance test results shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status required by paragraph (e) of this section. (§63.347(f)(2))
  - 11) *Ongoing compliance status reports for area sources.* The requirements of this paragraph do not alleviate affected area sources from complying with the requirements of State or Federal operating permit programs under 40 CFR Part 71. (§63.347(h))
    - A) The owner or operator of an affected source that is located at an area source site shall prepare a summary report to document the ongoing compliance status of the affected source. The report shall contain the information identified in paragraph (g)(3) of this section, shall be completed annually and retained on site, and made available to the Administrator upon request. The report shall be completed annually except as provided in paragraph (h)(2) of this section. (§63.347(h)(1))
      - i) *Reports of exceedances.* If both of the following conditions are met, semiannual reports shall be prepared and submitted to the Administrator: (§63.347(h)(2)(i))
        - a) The total duration of excess emissions (as indicated by the monitoring data collected by the owner or operator of the affected source in accordance with §63.343(c)) is 1 percent or greater of the total operating time for the reporting period; and (§63.347(h)(2)(i)(A))
        - b) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent or greater of the total operating time. (§63.347(h)(2)(i)(B))
      - ii) Once an owner or operator of an affected source reports an exceedance as defined in paragraph (h)(2)(i) of this section, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under paragraph (h)(3) of this section is approved. (§63.347(h)(2)(ii))
      - iii) The Administrator may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source. (§63.347(h)(2)(iii))
  - 12) *Request to reduce frequency of ongoing compliance status reports for area sources.* An owner or operator who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce

the frequency of reporting to annual and/or be allowed to maintain the annual report onsite if all of the following conditions are met: (§63.347(h)(3)(i))

- A) For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit; (§63.347(h)(3)(i)(A))
  - B) The owner or operator continues to comply with all applicable recordkeeping and monitoring requirements of subpart A of this part and this subpart; and (§63.347(h)(3)(i)(B))
  - C) The Administrator does not object to a reduced reporting frequency for the affected source, as provided in paragraphs (h)(3) (ii) and (iii) of this section. (§63.347(h)(3)(i)(C))
- 13) The frequency of submitting ongoing compliance status reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change, and the Administrator does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the Administrator may review information concerning the source's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the source's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of an owner or operator's conformance with emission limitations and work practice standards. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce reporting frequency, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. (§63.347(h)(3)(ii))
- 14) As soon as the monitoring data required by § 63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the owner shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the owner or operator may again request approval from the Administrator to reduce the reporting frequency as allowed by paragraph (h)(3) of this section. (§63.347(h)(3)(iii)).

<b>EU0050, EU0060, EU0070, EU0080, AND EU0090 – PAINT BOOTHS</b>			
Emission Unit	Description	Manufacturer/Model #	2007 EIQ Reference #
EU0050	Paint Booth #1	N/A	EP07
EU0060	Paint Booth #2	N/A	EP07
EU0070	Paint Booth #3	N/A	EP07
EU0080	Paint Booth #4	N/A	EP07
EU0090	Paint Booth #5	N/A	EP07

**PERMIT CONDITION (EU0050, EU0060, EU0070, EU0080, EU0090) - 001**  
 10 CSR 10-5.295 Control of Emissions From Aerospace Manufacture and Rework Facilities  
 Construction Permit 122001-009, Issued November 29, 2001  
 Construction Permit 052005-028, Issued May 27, 2005

---

---

**Emission Limitation:**

- 1) The permittee shall not cause, permit or allow the emissions of volatile organic compounds (VOC) from the coating of aerospace vehicles or components to exceed:
  - A) 2.9 pounds per gallon (350 grams per liter) of coating, excluding water and exempt solvents, delivered to a coating applicator that applies primers. For general aviation rework facilities the VOC limitation shall be 4.5 pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator that applies primers;
  - B) 3.5 pounds per gallon (420 grams per liter) of coating, excluding water and exempt solvents, delivered to a coating applicator that applies topcoats (including self-priming topcoats). For general aviation rework facilities, the VOC limit shall be 4.5 pounds per gallon (540 grams per liter) of coating, excluding water and exempt solvents, delivered to a coating applicator that applies topcoats including self-priming topcoats);
  - C) The VOC content limits listed in Table I of 10 CSR 10-5.295, expressed in pounds per gallon of coating, excluding water and exempt solvents, delivered to a coating applicator that applies specialty coatings;
- 2) The requirements for primers, topcoats, specialty coatings, and chemical milling maskants specified in 10 CSR 10-5.295(3)(A) do not apply to the use of low-volume coatings in these categories for which the rolling 12-month total of each separate formulation used at an installation does not exceed 50 gallons, and the combined rolling 12-month total of all such primers, topcoats, specialty coatings and chemical milling maskants used does not exceed 200 gallons. Coatings exempted under 10 CSR 10-5.295(3)(I) are not included in the 50 and 200 gallon limits.

**Operational Limitation/Equipment Specifications:**

- 1) The emission limitations in 10 CSR 10-5.295(3)(A)1. shall be achieved by –
  - A) The application of low solvent coating technology where each and every coating meets the specified applicable limitation expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents stated in 10 CSR 10-5.295(3)(A);
  - B) The application of low solvent coating technology where the monthly volume-weighted average VOC content of each specified coating type meets the specified applicable limitation expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, stated in 10 CSR 10-5.295(3)(A); averaging is not allowed for specialty coatings and averaging is not allowed between primers, topcoats (including self-priming topcoats), Type I milling maskants, and Type II milling maskants or any combination of the above coating categories; or
  - C) Control equipment, including but not limited to incineration, carbon adsorption and condensation, with a capture system approved by the Director, provided that the permittee demonstrates, in accordance with 10 CSR 10-5.295(5)(C), that the control system has a VOC reduction efficiency of 81% or greater.
- 2) Each permittee shall apply all non-exempt primers and topcoats using one or more of the application techniques specified below –
  - A) Flow/curtain application;
  - B) Dip coat application;
  - C) Roll coating;
  - D) Brush coating;
  - E) Cotton-tipped swab application;
  - F) Electrodeposition (dip) coating;

- 
- 
- G) High volume low pressure (HVLP) spraying;
  - H) Electrostatic spray application; or
  - D) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined by the Director.
- 3) The permittee shall ensure that all application devices used to apply primers and topcoats (including self-priming topcoats) are operated according to company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times. Equipment modified by the permittee shall maintain a transfer efficiency equivalent to HVLP or electrostatic spray application techniques.
- 4) The permittee shall comply with the following housekeeping requirements for any affected cleaning operation, unless the cleaning solvent used is an aqueous cleaning solvent, low vapor pressure hydrocarbon-based cleaning solvent, or contains less than 1% VOC by weight:
- A) Solvent-laden cloth, paper, or any other absorbent applicators used for cleaning shall be placed in bags or other closed containers upon completing their use. These bags and containers must be kept closed at all times except when depositing or removing these materials from the container. The bags and containers used must be of such a design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement;
  - B) All fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations shall be stored in closed containers; and
  - C) The handling and transfer of cleaning solvent to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh spent cleaning solvents shall be conducted in such a manner that spills are minimized.
- 5) Hand-Wipe Cleaning - The permittee shall comply with one of the following:
- A) Utilize cleaning solvent solutions that are classified as an aqueous cleaning solvent and/or a low vapor pressure hydrocarbon based cleaning solvent; or
  - B) Utilize cleaning solvent solutions that have a composite vapor pressure of 45 mmHg or less at 20 degrees Celsius (°C)
- 6) The permittee shall clean all spray guns used in the application of primers, topcoats (including self-priming topcoats), and specialty coatings utilizing one or more of the following techniques:
- A) Enclosed systems. Spray guns shall be cleaned in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing cleaning solvent through the gun. If leaks in the system are found, repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15<sup>th</sup> day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued;
  - B) Nonatomized cleaning. Spray guns shall be cleaned by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The cleaning solvent from the spray gun shall be directed into a vat, drum, or other waste container that is closed when not in use;
  - C) Disassembly spray gun cleaning. Spray guns shall be cleaned by disassembling and cleaning the components by hand in a vat, which shall remain closed during the soaking period and when not inserting or removing components; and

- 
- 
- D) Atomizing cleaning. Spray guns shall be cleaned by forcing the cleaning solvent through the gun and directing the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.
- 7) Flush Cleaning Operation – The permittee shall empty the used cleaning solvents each time aerospace parts or assemblies, or components of a coating unit with the exception of spray guns are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control approved by the Director. Aqueous, semi-aqueous, and low vapor pressure hydrocarbon based solvent materials are exempt from these requirements.

**Test Methods:**

- 1) The permittee shall determine compliance for coatings which are not waterborne (water-reducible), determine the VOC content of each formulation less water and less exempt solvents as applied using manufacturer's supplied data or Method 24 of 40 CFR Part 60, Appendix A. If there is a discrepancy between the manufacturer's formulation data and the results of the Method 24 analysis, compliance shall be based on the results from the Method 24 analysis. For waterborne (water reducible) coatings, manufacturer's supplied data alone can be used to determine the VOC content of each formulation.
- 2) The permittee shall determine compliance for cleaning solvents using the following:
  - A) For aqueous and semi-aqueous cleaning solvents manufacturers' supplied data shall be used to determine the water content; or
  - B) For hand-wipe cleaning solvents required in 10 CSR 10-5.295(3)(F), manufacturers' supplied data or standard engineering reference text or other equivalent methods shall be used to determine the vapor pressure or VOC composite vapor pressure for blended cleaning solvents.
- 3) The permittee electing to demonstrate compliance with 10 CSR 10-5.295 by use of a control equipment meeting the requirements of 10 CSR 10-5.295(3)(B)3., shall demonstrate the required capture efficiency in accordance with EPA Methods 18, 25, and/or 25A in 40 CFR 60, Appendix A.

**Record Keeping:**

- 1) Coatings: The permittee shall –
  - A) Maintain a current list of coatings in use with category and VOC content as applied;
  - B) Record each coating volume usage on a monthly basis; and
  - C) Maintain records of monthly volume-weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating averaging under 10 CSR 10-5.295(3)(B)2.
- 2) Cleaning Solvents: The permittee shall –
  - A) Maintain a list of materials with corresponding water contents for aqueous and semi-aqueous hand-wipe cleaning solvents;
  - B) Maintain a current list of cleaning solvents in use with their respective vapor pressure or, for blended solvents, VOC composite vapor pressure for all vapor pressure compliant hand-wipe cleaning solvents. This list shall include the monthly amount of each applicable solvent used; and
  - C) Maintain a current list of exempt hand-wipe cleaning process for all cleaning solvents with a vapor pressure greater than 45 mmHg used in exempt hand-wipe cleaning operations. This list shall include the monthly amount of each applicable solvent used.

- 
- 3) All records must be kept on-site for a period of five years and made available to the Department upon request.

**Reporting:**

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

---

---

#### 4) **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 as of the date that this permit is issued.

<b>10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions</b>
--

- 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 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. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(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. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

**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 Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
    - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
    - b) Paving or frequent cleaning of roads, driveways and parking lots;
    - c) Application of dust-free surfaces;
    - d) Application of water; and
    - e) Planting and maintenance of vegetative ground cover.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

#### **10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)**

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

#### **10 CSR 10-5.070 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the Director. The request shall include the following:

- a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the Director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Sullivan/Huggins Precision Metal Finishing from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the Director approving the open burning operation and previous Department of Natural Resources' inspection reports.

#### **10 CSR 10-5.160 Control of Odors in the Ambient Air**

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with twenty (20) or more volumes of odor-free air; or
- 3) Premises other than those in 1 and 2 above when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed. **This requirement is not federally enforceable.**

#### **10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

#### **10 CSR 10-6.100 Alternate Emission Limits**

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

---

---

**10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

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

- 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 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 record keeping 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 motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified 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.

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*

#### **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 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.

<b>10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration</b>
---

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.

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

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program'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, record keeping, 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 paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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 40 CFR Section 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:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) 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 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'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 record keeping 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, 901 North 5th Street, Kansas City, KS 66101, 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 Mr. Don Scowden, Senior 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.

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

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

This record keeping sheet or an equivalent sheet may be used to meet the record keeping requirements for Permit Condition (EU001, EU0020)-001.

Equipment	Heat Input (mmBtu/hr)
Boiler SCC 10201002, EU0010	0.5
Boiler SCC 10200603, EU0020	0.5
Total Heat Input (Q)	1.0

The following table demonstrates compliance with the emission limit:

$$\text{Potential Emission Rate (lb/mmBtu)} = \text{MHDR} * \text{PM Emission Factor} / \text{Heat Capacity}$$

Emission Unit	Heat Capacity	Maximum Hourly Design Rate*	PM Emission Factor	Emission Factor Reference	Potential Emission Rate (lb/mmBtu)	Emission Rate Limit (lb/mmBtu)**
EU0010	0.5 mmBtu/hr	0.0053191 1000 gal/hr	1.106 lb/1000 gal	FIRE	0.012	0.40
EU0020	0.5 mmBtu/hr	0.0053191 1000 gal/hr	1.106 lb/1000 gal	FIRE	0.012	0.40

\* Maximum Hourly Design Rate from 2007 EIQ, based upon worst case scenario of both boilers operating on propane.

\*\* The emission rate limit of 0.40 lb/mmBtu was determined from 10 CSR 10-5.030 (3)(B)1. which states, "The maximum allowable particulate ER for new sources in an installation of indirect heating sources with a heat input rate of less than ten (10) million BTUs per hour shall be 0.40 pounds per million BTUs of heat input."

---

---

# STATEMENT OF BASIS

## **Voluntary Limitations**

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

## **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 February 4, 2008
- 2) 2007 Emissions Inventory Questionnaire, received January 22, 2008; and
- 3) 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.

None.

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

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

### *10 CSR 10-6.070 New Source Performance Standards*

This rule is not applicable because no New Source Performance Standards apply to this facility

### *10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds*

This rule is not applicable because the installation uses exclusively pipeline grade natural gas and liquefied petroleum gas (referred to as propane in the permit narrative) in their combustion equipment.

### *10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes*

This rule does not apply to the boilers because they burn fuel used for indirect heating which is exempted from this regulation per 10-6.400(1)(B)6. The paint booths are exempt per 10 CSR 10-6.400 (1)(B)14, because the paint booths have fabric filter control that is assumed to be at least ninety-five (95%) efficient at controlling particulate overspray. According to Construction Permit

---

---

052005-028, the PM<sub>10</sub> PTE from the installation of the two (2) chromic acid anodizing tanks is 0.017 tons per year or 0.0039 lbs/hr PM<sub>10</sub>. Therefore the chromic acid anodizing tanks are exempt per 10 CSR 10-6.400(1)(B)12.

40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*:

EU0010, EU0020 are not subject to the requirements of Subpart Db because their respective capacities are less than 100 MMBtu/hr.

40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*:

EU0010, EU0020 are not subject to the requirements of Subpart Dc because their respective capacities are less than 10 MMBtu/hr.

### **Construction Permit Revisions**

Construction Permit 1297-022, Special Condition 1. Odors:

Special Condition 1 in the original issued permit has been superseded by Special Condition 1. Odors in the amendment letter from the Missouri Department of Natural Resources Air Pollution Control Program, dated January 6, 1998, addressed to Mr. William Huggins. Specifically, the amendment letter corrects a reference to a CSR odor regulation. The correct reference pertaining to odors for Sullivan Precision Metal Finishing per the amendment letter is 10 CSR 10-5.160.

Construction Permit 1297-022, pages 5-8:

Pages 5 through 8 of the original permit have been superseded by pages 5 through 8 in the Missouri Department of Natural Resources Air Pollution Control Program letter dated January 27, 1998, addressed to Mr. William Huggins.

Construction Permit 1297-022, Applicable Requirements I.C. Fugitive Particulate Matter:

Permit amendment letter dated January 27, 1998, lists Restriction of Emission of Visible Air Contaminants, 10 CSR 10-5.090 as the applicable requirement for fugitive particulate matter. 10 CSR 10-5.090 was rescinded May 30, 2000, and therefore no longer applicable. Fugitive particulate matter for this facility is addressed per 10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin.

Construction Permit 1297-022, Applicable Requirements II.A.1. Control of Emissions from Industrial Surface Coating Operations, 10 CSR 10-5.330:

10 CSR 10-5.330 is no longer applicable to this facility. As described in Construction Permit 122001-009, Sullivan Precision Metal Finishing has been treating and surface coating aerospace assembly components and was subject to 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*. This regulation limits primers to 6.0 lbs./gal VOCs and topcoat to 5.0 lbs./gal VOCs. However, this regulation was amended on December 31, 2000. This amendment removed the restriction on aerospace surface coating operations. The rule file indicates that surface coatings of aerospace components are covered under 10 CSR 10-5.295 *Control of Emissions from Aerospace Manufacturing and Rework Facilities*. 10 CSR 10-5.295 has been incorporated into this permit as PERMIT CONDITION (EU0050, EU0060, EU0070, EU0080, EU0090) – 001.

---

---

Construction Permit 122001-009, Applicable Requirements I.B.1 Restriction of Emission of Odors, 10 CSR 10-3.090:

Construction Permit 122001-009 incorrectly lists 10 CSR 10-3.090 as the applicable rule for Sullivan Precision Metal Finishing. 10 CSR 10-3.090 applies to facilities located in the outstate area of Missouri. Since Sullivan Precision Metal Finishing is located in Franklin County the correct rule restricting the emission of odors from their facility is 10 CSR 10-5.160 *Control of Odors in the Ambient Air*.

Construction Permit 102004-003:

This construction permit was issued to allow Sullivan Precision Metal Finishing to construct a new paint booth. According to their Application for Authority to Operate, Form OP-D01, the owner states that the paint booth referenced by permit 102004-003 was not constructed, therefore, this construction permit and its requirements are not applicable.

Construction Permit 052005-028, GENERAL REQUIREMENTS, Restriction of Emission of Odors, 10 CSR 10-3.090:

Construction Permit 052005-028 incorrectly lists 10 CSR 10-3.090 as the applicable rule for Sullivan Precision Metal Finishing. 10 CSR 10-3.090 applies to facilities located in the outstate area of Missouri. Since Sullivan Precision Metal Finishing is located in Franklin County the correct rule restricting the emission of odors from their facility is 10 CSR 10-5.160 *Control of Odors in the Ambient Air*.

Construction Permit 052005-028, SPECIFIC REQUIREMENTS, Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400:

As stated in Other Air Regulations Determined Not to Apply to the Operating Permit section above, 10 CSR 10-6.400 is not applicable to this facility.

Construction Permit 052005-028, REVIEW SUMMARY, Emission Points:

In construction permit 052005-028, the 16-foot and 32-foot chromic acid anodizing tanks are identified as EP-01 and EP-06 respectively. Based upon the 2007 EIQ, the owner has identified these emission points as a single emission point, EP-06. In order to maintain the continuity of the 2007 EIQ, future EIQs and this operating permit, the emission point of the 16-foot and 32-foot chromic acid anodizing tanks (EU0030 and EU0040 respectively) is designated as EP-06 in the operating permit

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

None.

### **Maximum Available Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart N, *National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*:

The Subpart N MACT standard applies to each chromium electroplating or chromium anodizing tank at facilities performing hard chromium electroplating, decorative chromium electroplating, or chromium anodizing. Sullivan Precision Metal Finishing operates two (2) chromium anodizing tanks (one 16 ft. and one 32 ft. tank) for anodizing aluminum aircraft parts, therefore Subpart N is applicable to both the 16 and 32 ft. chromium anodizing tanks.

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

None.

### **Other Regulatory Determinations**

Permit Condition (EU0010, EU0020) – 001, *10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants*:

EU0010 and EU0020 are dual fuel boilers capable of combusting natural gas and liquefied petroleum gas (propane). This regulation was not applied to EU0010 and EU0020 as it is highly unlikely that these units would ever exceed the opacity requirements listed in the regulation.

### **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:

---

Don Murphy  
Environmental Engineer