



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2013-049
Expiration Date: DEC 13 2018
Installation ID: 229-0001
Project Number: 2011-07-063

Installation Name and Address

Hutchens Industries, Inc. Mansfield Facility
898 East Commercial
Mansfield, MO 65704
Wright County

Parent Company's Name and Address

Hutchens Industries, Inc. Mansfield Facility
P.O. Box 137
Mansfield, MO 65704

Installation Description:

Hutchens Industries, Inc. – Mansfield Facility fabricates truck trailer suspensions. Operations at this installation consist of welding and surface coating of metal parts. This installation has been in operation since approximately 1971. The facility previously operated under a Part 70 Operating Permit but is requesting VOC and HAP emissions limits below major levels to allow for the issuance of this Intermediate Operating Permit.

DEC 13 2018

Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Hutchens Industries, Inc. – Mansfield Facility fabricates truck trailer suspensions. Operations at this installation consist of welding and surface coating of metal parts. This installation has been in operation since approximately 1971. The facility previously operated under a Part 70 Operating Permit but is requesting VOC and HAP emissions limits below major levels to allow for the issuance of this Intermediate Operating Permit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2012	2011	2010	2009	2008
Particulate Matter ≤ Ten Microns (PM ₁₀)	1.68	2.39	0.62	0.43	0.76
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.02	0.04	0.03	0.02	0.04
Sulfur Oxides (SO _x)	0.004	0.008	0.006	0.005	0.007
Nitrogen Oxides (NO _x)	0.71	1.32	0.95	0.78	1.15
Volatile Organic Compounds(VOC)	19.59	21.28	12.96	5.56	12.06
Carbon Monoxide (CO)	0.22	0.51	0.30	0.25	0.29
Lead (Pb)	---	---	---	---	---
Hazardous Air Pollutants (HAPs)	---	---	---	---	---
Ammonia (NH ₃)	0.06	0.10	0.08	0.06	0.10

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>	
EU0090	Spray Paint Booth #1	(EP-013)
EU0100	Spray Paint Booth #2	(EP-013)
EU0110	Spray Paint Booth #3	(EP-013)
EU0160	Pyrolysis Furnace	(EP-019)
EU0170	Plasma Torch	(EP-026)
EU0180	Robotic Welding Booth 12A	(EP-012)
EU0190	Robotic Welding Booth 12B	(EP-012)
EU0200	Robotic Welding Booth 12C	(EP-012)
EU0210	Robotic Welding Booth 12D	(EP-012)
EU0330	Small part Dip Paint Operation	(EP-33)
EU0340A	12,000 gallon Alkaline Wash Tank	(EP-34A)
EU0340B	6000 gallon Iron Phosphate Heated Tank	(EP-34B)
EP0350	Paint Curing System	(EP-35)
EU0360	Pyrolysis Furnace	(EP-36)

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.

<u>Description of Emission Source</u>	
Space Heaters, natural gas heaters, <10 MMBtu/hr each	(EP-017)
Alkaline Wash, natural gas burner, <10 MMBtu/hr	(EP-029A)
Phosphate Wash, natural gas burner, <10 MMBtu/hr	(EP-029B)
Welding Machines	(EP-014, EP-023)
Dip Paint Operation #1	(EP-028)
Curing Oven	(EP-030)

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

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

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of monthly usage for each VOC emitting material, including amount received, amount shipped, and amount loaded for each material.
2. The permittee shall maintain supplier data demonstrating vapor pressure of all materials, such as MSDS, or analytical data.
3. The permittee shall utilize emissions calculation spreadsheets to adjust throughput accordingly based on material vapor pressure and to demonstrate annual VOC emissions do not exceed 100 tons per 12-month period combined for all emission units.
4. The permittee shall calculate their annual emission of volatile organic compounds by summing the monthly emissions from each VOC emitting material for the last twelve months. The annual emission will be calculated each month using the most recent twelve months' worth of monthly emission totals.
5. All records shall be kept for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation.

Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

1. The permittee shall emit less than ten (10) tons individually of any Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.

2. The permittee shall emit less than twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall record the amount of each HAP emitting material used each month.
2. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAPs.
3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all material used at the installation.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 10 tons individual or 25 tons combined should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

EU0090 through EU0110 Spray Paint Booth #1 Spray Paint Booth #2 Spray Paint Booth #3			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2012)
EU0090	Spray paint booth #1; painting of metal parts and products; MHDR 17.5 gal/hr; equipped with nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; installed pre-1996	In-house	EP-013
EU0100	Spray paint booth #2; painting of metal parts and products; MHDR 8.75 gal/hr; equipped with nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; installed pre-1996	In-house	EP-013
EU0110	Spray paint booth #3; painting of metal parts and products; MHDR 8.75 gal/hr; equipped with nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; installed pre-1996	In-house	EP-013

PERMIT CONDITION (EU0090-EU0110)-001 10 CSR 10-6.400 Control of Emissions of Particulate Matter From Industrial Processes

Emission Limit:

- 1) The permittee shall not emit particulate matter from EU0090 in a concentration in excess of 0.0625 grain per standard cubic feet of exhaust gases.
- 2) The permittee shall not emit particulate matter from EU0100 in a concentration in excess of 0.0716 grain per standard cubic feet of exhaust gases.
- 3) The permittee shall not emit particulate matter from EU0110 in a concentration in excess of 0.0787 grain per standard cubic feet of exhaust gases.
- 4) The emissions limitations area based on the concentrations specified in 10 CSR 10-6.400(3)(A)2. Table 1 for the given source gas volume.

Monitoring:

- 1) Booths operated with mat/panel filters (EU0090 through EU0110) shall not be operated without a filter in place.
- 2) The filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

- 1) The permittee shall maintain records of the inspections of fabric filters when they occur.
 - a) All inspections, corrective actions, and instrument calibrations shall be recorded.
 - b) Attachment C contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
- 2) All records shall be kept on-site for a minimum of five years and made available to Missouri Department of Natural Resources' personnel upon request.

Reporting:

Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION (EU0090-EU0110)-002

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

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units (EU0090 through EU0120) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-

- b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
- c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment C)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B)
- 4) Attachments A, B and C contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission units exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0160 Pyrolysis Furnace			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2012)
EU0160	Controlled pyrolysis cleaning furnace which cleans nonhazardous paint from paint line hooks; fired with pipeline grade natural gas; MHDR 0.3 MMBtu; installed 1993	Pollution Control Products/Model PTR-88	EP-019

PERMIT CONDITION EU0160-001
10 CSR 10-6.060 Construction Permits Required Construction Permit No. 0691-015, Issued June 28, 1991

Emission Limitation:

- 1) No plastic or teflon materials shall be processed in the EU0160, the controlled pyrolysis cleaning furnace. A permit modification shall be obtained from the Missouri Department of Natural Resources prior to any change in the type or quantities of materials processed in EU0160, the pyrolysis furnace, other than what is contained in the original construction permit application. [Special Condition 1]
- 2) Operating personnel must have adequate training and knowledge of the operation of EU0160, the pyrolysis furnace. Training shall include the manufacturer’s standard operating procedures. [Special Condition 2]
- 3) EU0160, the pyrolysis furnace, shall be operated in accordance with the manufacturer instruction and guidelines of operation. [Special Condition 3]
- 4) The manufacturer instructions and guidelines of operation shall be immediately available upon request by the Department of Natural Resources personnel. [Special Condition 4]

Recordkeeping:

A copy of Construction Permit #0691-015 shall be kept at the facility and shall be made available to Department of Natural Resources personnel upon request. [Special Condition 5]

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0170 Plasma Torch			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2012)
EU0170	Dry plasma metal cutting torch used to cut 0.375 inch thick sheets of cold rolled steel; MHDR 0.96 ton steel/hr; permitted 1997	N/A	EP-026

PERMIT CONDITION EU0170-001
10 CSR 10-6.400 Control of Emissions of Particulate Matter from Industrial Processes

Emissions Limitation:

- 1) Particulate matter shall not be emitted from EU0170 in excess of 3.98 lb/hr.
- 2) The emission rates were calculated using the following equation:
 - a) For process weight rates of 60,000 lb/hr or less:

$$E = 4.10(P)^{0.67}$$
 Where:
 E = rate of emission in lb/hr
 P = process weight rate in tons/hr
- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Monitoring/Recordkeeping:

- 1) The permittee shall retain the potential to emit calculations in Attachment D, which demonstrate that the above emission limitations will not be exceeded.
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records shall be kept for a period of five years.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION EU0170-002

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

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on Emission Unit EU0170 using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment C)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B)
- 4) Attachments A, B and C contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission units exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0180 through EU0210 Robotic Welding Booth 12A Robotic Welding Booth 12B Robotic Welding Booth 12C Robotic Welding Booth 12D			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2012)
EU0180	Robotic welding booth 12A; E70S electrode; 2 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	EP-012
EU0190	Robotic welding booth 12B; E70S electrode; 2 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	EP-012
EU0200	Robotic welding booth 12C; E70S electrode; 2 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	EP-012
EU0210	Robotic welding booth 12D; E70S electrode; 2 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	EP-012

PERMIT CONDITION (EU0180-EU0210)-001
10 CSR 10-6.400 Control of Emissions of Particulate Matter from Industrial Processes

Emissions Limitation:

- 1) The permittee shall not emit particulate matter from EU0180 in a concentration in excess of 0.100 grain per standard cubic feet of exhaust gases.
- 2) The permittee shall not emit particulate matter from EU0190 in a concentration in excess of 0.100 grain per standard cubic feet of exhaust gases.
- 3) The permittee shall not emit particulate matter from EU0200 in a concentration in excess of 0.100 grain per standard cubic feet of exhaust gases.
- 4) The permittee shall not emit particulate matter from EU0210 in a concentration in excess of 0.100 grain per standard cubic feet of exhaust gases.
- 5) The emissions limitations area based on the concentrations specified in 10 CSR 10-6.400(3)(A)2. Table 1 for the given source gas volume.

Monitoring/Recordkeeping:

- 1) The permittee shall retain the potential to emit calculations in Attachment E, which demonstrate that the above emission limitations will not be exceeded.
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records shall be kept for a period of five years.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION (EU0180-EU0210)-002

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

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on these emission units (EU0180 through EU0210) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:

- a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment C)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B)
- 4) Attachments A, B and C contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission units exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0330-EU0350 Dip Coating Operation			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2003)
EU0330	W/R Dip Paint System – 600 gallon non heated non chrome seal tank, one non heated air blow off system, one 2,500 gallon water reducible dip pant tank. MHDR = 5.32 gal/hr; Constructed 8/20/2009	In-house	EP-33
EU0340A	Alkaline wash is a 12,000 gallon heated tank with 1.269 MMBtu/hr burner and 600 gallon non heated rinse tank; Constructed 8/20/2009	In-house	EP-34A
EU0340B	Iron phosphate wash – 600 gallon heated tank with .706 MMBtu/hr burner and 6000 gallon non heated rinse tank; Constructed 8/20/2009	In-house	EP-34B

EU0350	Paint curing system – 14 natural gas burners at 0.05 MMBtu/hr each and one overhead conveyor with a line speed of 10-15 feet/minute	In-house	EP-35
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PERMIT CONDITION (EU0330-EU0350)-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 082009-009, Issued August 20, 2009

Emission Limitations:

- 1) Hutchens Industries, Inc., Mansfield Facility shall emit less than 40.0 tons of Volatile Organic Compounds (VOCs) from emission units EU0330, EU0340A, EU0340B and EU0350. [Special Condition 1.A]
- 2) When considering using an alternative material in the W/R Dip Tank (EU0330) that is different than the material listed in the Application for Authority to Construct, the permittee shall calculate the potential emissions of VOCs and each individual HAP in the alternative material. [Special Condition 2.1]
- 3) The permittee shall seek approval from the Air Pollution Control Program before using an alternative material in the following cases:
 - a) If the potential VOC emissions for the alternative material is equal to or greater than 40.0 tons per year for a paint coating or a reducer or wash chemical;
 - b) If the potential individual HAP emissions for the alternative material is equal to or greater than the Screening Model Action Levels (SMAL) for any compound listed in Attachment H, or found at http://www.dnr.mo.gov/forms/NSR_SUPPL_INFO_PACKAGE.pdf.

Monitoring/Recordkeeping:

- 1) Attachment F or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limitation. [Special Condition 1.B]
- 2) Attachment G or an equivalent form shall be used to show compliance with Condition 2 and 3 above.
- 3) The permittee shall maintain all records for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in this equipment. [Special Condition 1.B]

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate that the source exceeds the emission limitation. [Special Condition 1.C]

EU0360 Pyrolysis Furnace			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2003)
EU0360	300,000 btu/hr natural gas pyrolysis cleaning (burn-off) furnace; Installed July 21, 2011	In-house	EP-36

PERMIT CONDITION EU0360-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 102011-008, Issued October 17, 2011

Emission Limitation:

The cleaning oven (EU0360) shall have opacity of less than ten percent (10%) at all times. [Condition 1.E]

Operational Limitations:

- 1) The permittee shall use EU0360- Pyrolysis Furnace Cleaning Oven exclusively to remove non-chlorinated/non-hazardous coatings from metal parts. [Special Condition 1.A]
- 2) Natural Gas shall be the only fuel burned in this oven. [Special Condition 1.B]
- 3) The permittee shall use a direct flame afterburner to control emissions from the cleaning oven. The afterburner shall be operated at a temperature of at least 1,400 degrees Fahrenheit with more than a one-half (1/2) second residence time to ensure a minimum combustion efficiency of 99.9%. [Special Condition 1.C]
- 4) The oven shall be equipped with an electric controller, with digital readout, which is able to monitor and display the temperature in the second combustion chamber to an accuracy of plus or minus two percent (2%). [Special Condition 1.D]

Monitoring:

- 1) The permittee shall conduct opacity readings on Emission Unit EU0360 using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.

- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment C)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B)
- 4) Attachments A, B and C contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission units exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually, in the annual monitoring report and annual compliance certification, as required by Section IV of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Hutchens Industries, Inc. Mansfield Facility may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Hutchens Industries, Inc. Mansfield Facility fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
- a) Name and location of installation;
- b) Name and telephone number of person responsible for the installation;
- c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
- d) Identity of the equipment causing the excess emissions;
- e) Time and duration of the period of excess emissions;
- f) Cause of the excess emissions;
- g) Air pollutants involved;
- h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;

- i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
 - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under 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 submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

Emission Limitation:

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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the 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 recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the 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.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

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.

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

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

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

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in 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 semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Kevin Dobson, Director of Human Resources. 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 permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment B

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

ATTACHMENT D

This attachment demonstrates compliance determinations for 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* for the emission units listed.

PM Emission Rate Compliance

Emission Unit ID	Associated Equip.	Process Weight Rate (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor Reference	Potential Uncontrolled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0170	² Plasma Torch	0.96	1.99	Mass balance	1.90	3.98

Notes:

1. PM emission factors were not available in FIRE or AP-42, assumed emission factor for PM = 2 x emission factor for PM₁₀
2. Process weight rate and emission factor supplied by Gary Norell, Hutchens Environmental/Safety Director

Sample Calculation

Emission Rate Limit:

$$E = 4.10(P)^{0.67}$$

P is process weight rate in tons/hour

E is emission rate limit in lb/hour

$$E = 4.10(2.5)^{0.67} = 7.58 \frac{lb PM}{hour}$$

PM Concentration Compliance

Emission Unit ID	Associated Equip.	Potential Uncontrolled Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Emission Rate (gr/scf)	Emission Rate Limit (gr/scf)
				ACFM	SCFM		
EU0170	Plasma Torch	1.90	77	10,000	9,832	0.023	0.3

Sample Calculation

$$\text{Potential PM Concentration} = \frac{3.50 \text{ lb PM}}{hr} \times \frac{7000 \text{ gr}}{lb} \times \frac{\text{min}}{72,960 \text{ scf}} \times \frac{1 \text{ hr}}{60 \text{ min}} = 0.006 \frac{\text{gr PM}}{\text{scf}} < 0.30 \frac{\text{gr PM}}{\text{scf}}$$

ATTACHMENT E

This attachment demonstrates compliance determinations for 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* for the emission units listed.

PM Emission Rate Compliance

Emission Unit ID	Associated Equip.	Process Weight Rate (1000 lb/hr)	PM Emission Factor (lb/1000 lb)	Emission Factor Reference	Potential Uncontrolled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0180	Welding of Metal Parts	0.125	5.2	FIRE SCC# 30905254	0.65	0.64
EU0190	Welding of Metal Parts	0.125	5.2	FIRE SCC# 30905254	0.65	0.64
EU0200	Welding of Metal Parts	0.125	5.2	FIRE SCC# 30905254	0.65	0.64
EU0210	Welding of Metal Parts	0.125	5.2	FIRE SCC# 30905254	0.65	0.64

Notes:

- According to AP-42 Section 12.19, most of the PM produced by welding is submicron in size and is considered to be all PM₁₀

Sample Calculation

Emission Rate Limit:

$$E = 4.10(P)^{0.67}$$

P is process weight rate in tons/hour

E is emission rate limit in lb/hour

$$E = 4.10(0.63)^{0.67} = 0.64 \frac{\text{lb PM}}{\text{hour}}$$

PM Concentration Compliance

Emission Unit ID	Associated Equip.	Potential Uncontrolled Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Emission Rate (gr/scf)	Emission Rate Limit (gr/scf)
				ACFM	SCFM		
EU0180	Welding of Metal Parts	0.65	77	1,500	1,475	0.051	0.100
EU0190	Welding of Metal Parts	0.65	77	1,500	1,475	0.051	0.100
EU0200	Welding of Metal Parts	0.65	77	1,500	1,475	0.051	0.100
EU0210	Welding of Metal Parts	0.65	77	1,500	1,475	0.051	0.100

Sample Calculation

$$\text{Potential PM Concentration} = \frac{0.65 \text{ lb PM}}{\text{hr}} \times \frac{7000 \text{ gr}}{\text{lb}} \times \frac{\text{min}}{1,475 \text{ scf}} \times \frac{1 \text{ hr}}{60 \text{ min}} = 0.051 \frac{\text{gr PM}}{\text{scf}} < 0.100 \frac{\text{gr PM}}{\text{scf}}$$

ATTACHMENT H

Hazardous Air Pollutant (HAP) Threshold Levels

Chemical	CAS#	Emission Threshold Levels (tons/year)	Synonyms
Acetaldehyde	75-07-0	9	Acetic Aldehyde, Aldehyde, Ethanal, Ethyl Aldehyde
Acetamide	60-35-5	1	Acetic Acid Amide, Ethanamide
Acetonitrile	75-05-8	4	Methyl Cyanide, Ethanenitrile, Cyanomethane
Acetophenone	98-86-2	1	Acetylbenzene, Methyl Phenyl Ketone, Hypnone
Acetylamino fluorine, [2-]	53-96-3	0.005	N-2-Fluorenyl Acetamide, N-Fluorene-2-yl Acetamide, 2-Acetamideofluorene
Acrolein	107-02-8	0.04	Acrylaldehyde, Acrylic Aldehyde, Allyl Aldehyde, Propenal
Acrylamide	79-06-1	0.02	Propenamide, Acrylic Amide, Acrylamide Monomer, Ethylenecarboxamide
Acrylic Acid	79-10-7	0.6	Propenoic Acid, Ethylene Carboxylic Acid, Vinylformic Acid
Acrylonitrile	107-13-1	0.3	Vinyl Cyanide, Cyanoethylene, Propenenitrile
Allyl Chloride	107-05-1	1	1-Chloro-2-Propene, 3-Chloropropylene, Chloroallylene, Alpha-Propylene
Aminobiphenyl, [4-]	92-67-1	1	Biphenylene, P -Phenylaniline, Xenylamine, 4-Aminodiphenyl, 4-Biphenylamine
Aniline	62-53-3	1	Aminobenzene, Phenylamine, Aniline Oil, Aminophen, Arylamine
Anisidine, [Ortho-]	90-04-0	1	O-Methoxyaniline
Antimony Compounds (except those specifically listed)		5	Antimony (Pentachloride, Tribromide, Trichloride, Trifluoride)
Antimony Pentafluoride	7783-70-2	0.1	
Antimony Potassium Tartrate	28300-74-5	1	
Antimony Trioxide	1309-64-4	1	
Antimony Trisulfide	1345-04-6	0.1	
Arsenic and Inorganic Arsenic Compounds		0.005	Arsenic (Diethyl, Disulfide, Pentoxide, Trichloride, Trioxide, Trisulfide), Arsinine, Arsenous Oxide
Benz(a)Anthracene	56-55-3	0.01	
Benz(c)acridine	225-51-4	0.01	
Benzene	71-43-2	2	Benzol, Phenyl Hydride, Coal Naphtha, Phene, Benxole, Cyclohexatriene
Benzidine	92-87-5	0.0003	4,4'-Biphenyldiamine, P-Diaminodiphenyl, 4,4'-Diaminobiphenyl, Benzidine Base
Benzo(a)pyrene	50-32-8	0.01	
Benzo(b)fluoranthene	205-992	0.01	
Benzotrichloride	98-07-7	0.006	Benzoic Trichloride, Phenylchloroform, Trichloromethylbenzene
Benzyl Chloride	100-44-7	0.1	Alpha-Chlorotoluene, Toly Chloride
Beryllium Compounds (except Beryllium Salts)		0.008	Beryllium (Acetate, Carbonate, Chloride, Fluoride, Hydroxide, Nitrate, Oxide)
Beryllium Salts		0.00002	
Biphenyl*	92-52-4	10	
Bis(Chloroethyl)Ether	111-44-4	0.06	Dichloroethyl ether, Dichloroether, Dichloroethyl

			Oxide, BCEE
Bis(Chloromethyl)Ether	542-88-1	0.0003	BCME, Sym-Dichloromethyl ether, Dichloromethyl Ether, Oxybis-(Chloromethane)
Bromoform*	75-25-2	10	Tribromomethane
Butadiene, [1,3-]	106-99-0	0.07	Biethylene, Biviny, Butadiene Monomer, Divinyl Erythrene, Vinylethylene
Butylene Oxide, [1,2-]	106-88-7	1	1,2-Epoxybutane, 1-Butene Oxide, 1,2-Butene Oxide, Butylene Oxide, Ethylethylene
Cadmium Compounds		0.01	Cadmium (Dust, Fume, Acetate, Chlorate, Chloride, Fluoride, Oxide, Sulfate, Sulfide)
Calcium Cyanamide*	156-62-7	10	
Caprolactam*	105-60-2	10	
Captan*	133-06-2	10	
Carbaryl*	63-25-2	10	
Carbon Disulfide	75-15-0	1	Carbon Bisulfide, Dithiocarbonic Anhydride
Carbon Tetrachloride	56-23-5	1	Tetrachloromethane, Perchloromethane
Carbonyl Sulfide	463-58-1	5	Carbon Oxide Sulfide, Carbonoxysulfide
Catechol	120-80-9	5	Pyrocatechol, O-Dihydroxybenzene
Chloramben	133-90-4	1	3-Amino-2,5-Dichlorobenzoic Acid, Amben, Amiben*, Vegiben* (*Trademark)
Chlordane	57-74-9	0.01	ENT9932, Octachlor
Chlorine	7782-50-5	0.1	Bertholite
Chloroacetic Acid	79-11-8	0.1	Monochloroacetic Acid, Chloroethanoic Acid
Chlorobenzene	108-90-7	10	
Chloroacetophenone, [2-]	532-27-4	0.06	Phenacyl Chloride, Chloromethyl Phenyl Ketone, Tear Gas, Mace
Chlorobenzilate	510-15-6	0.4	Ethyl-4,4'-Dichlorobenzilate, Ethyl-4,4'-Dichlorophenyl Glycollate
Chloroform	67-66-3	0.9	Trichloromethane
Chloromethyl Methyl Ether	107-30-2	0.1	CMME, Methyl Chloromethyl Ether, Chloromethoxymethane, Monochloromethyl Ether
Chloroprene	126-99-8	1	2-Chloro-1,3-Butadiene, Chlorobutadiene, Neoprene Rubber Compound
Chromic Chloride	10025-73-7	0.1	
Chromium Compounds (except Hexavalent)		5	Chromium, Chromium(II) Compounds, Chromium (III) Compounds
Chromium Compounds, Hexavalent		0.002	Chromium (VI)
Chrysene	218-01-9	0.01	
Cobalt Carbonyl	12010-68-1	0.1	
Cobalt Metal (and compounds, except those specifically listed)		0.1	Cobalt (Bromide, Chloride, Diacetate, Formate, Nitrate, Oxide, Sulfamate)
Coke Oven Emissions	8007-45-2	0.03	Coal Tar, Coal Tar Pitch, Coal Tar Distillate
Cresol, [Meta-]	108-39-4	1	3-Cresol, M-Cresylic Acid, 1-Hydroxy-3-Methylbenzene, M-Hydroxytoluene
Cresol, [Ortho-]	95-48-7	1	2-Cresol, O-Cresylic Acid, 1-Hydroxy-2-Methylbenzene, 2-Methylphenol
Cresol, [Para-]	106-44-5	1	4-Cresol, P-Cresylic Acid, 1-Hydroxy-4-Methylbenzene, 4-Hydroxytoluene
Cresols/ Cresylic Acid (isomers and mixture)	1319-77-3	1	
Cumene	98-82-8	10	
Cyanide Compounds (except those specifically)	20-09-7	5	Cyanide (Barium, Chlorine, Free, Hydrogen, Potassium, Silver, Sodium, Zinc)

listed) ¹			
DDE (p,p'-Dichlorodiphenyl Dichloroethylene)	72-55-9	0.01	
Di(2-Ethylhexyl)Phthalate, (DEHP)	117-81-7	5	Bis(2-ethylhexyl)Phthalate, Di(2-Ethylhexyl)Phthalate, DOP, Di-Sec-Octyl Phthalate
Diaminotoluene, [2,4-]	95-80-7	0.02	2,4-Toluene Diamine, 3-Amino-Para-Toluidine, 5-Amino-Ortho-Toluidine
Diazomethane	334-88-3	1	Azimuthylene, Diazirine
Dibenz(a,h)anthracene	53-70-3		
Dibenzofuran	132-64-9	5	Diphenylene Oxide
Dibenzopyrene, [1,2:7,8]	189-55-9		
Dibutylphthalate*	84-74-2	10	
Dibromo-3-Chloropropane, [1,2-]	96-12-8	0.01	DBCP
Dibromomethane, [1,2-]	106-93-4	0.1	Ethylene Dibromide, Ethylene Bromide, Sym-Dibromoethane
Dichlorobenzene, [1,4-]	106-46-7	3	1,4-Dichloro-P-DCB, 1-4-DCB, PDB, PDCB
Dichlorobenzidine, [3,3-]	91-94-1	0.2	4,4'-Diamino-3,3'-Dichlorobiphenyl, 3,3'-Dichlorobiphenyl-4,4'-Diamine, DCB
Dichloroethane, [1,1-]	75-34-3	1	Ethylidene Dichloride, 1,1-Ethylidene Dichloride, Asymmetrical Dichloroethane
Dichloroethane, [1,2-]	107-06-2	0.8	Ethylene Dichloride, Glycol Dichloride, Ethylene Chloride
Dichloroethylene, [1,1-]	75-35-4	0.4	Vinylidene Chloride, DCE, VDC
Dichlorophenoxyacetic acid, [2,4], salt and esters*	94-75-7	10	
Dichloropropane, [1,2-]	78-87-5	1	Propylene Dichloride
Dichloropropene [1,3-]	542-75-6	1	1,3-Dichloropropylene, Alpha-Chlorallyl Chloride
Dichlorvos	62-73-7	0.2	DDVP, 2,2-Dichlorovinyl dimethylphosphate
Diethanolamine	11-42-2	5	Bis(2-Hydroxyethyl)Amine, 2,2'-Dihydroxydiethylamine, Di(2-Hydroxyethyl)Amine
Diethyl Sulfate	64-67-5	1	Diethyl Ester Sulfuric Acid, Ethyl Sulfate
Dimethoxybenzidine, [3,3-]	119-90-4	0.1	Fast Blue B Base, Dianisidine, O-Dianisidine
Dimethylbenz(a)anthracene, [7,12]	57-97-6	0.01	
Dimethyl Benzidine, [3,3-]	119-93-7	0.008	O-Tolidine, Bianisidine, 4,4'-Diamino-3,3'-Dimethylbiphenyl, Diaminoditoyl
Dimethyl Carbamoyl Chloride	79-44-7	0.02	DMCC, Chloroformic Acid Dimethyl Amide, Dimethyl Carbamyl Chloride
Dimethyl Formamide	68-12-2	1	DMF, Formyldimethylamine
Dimethyl Hydrazine, [1,1-]	57-14-7	0.008	Unsymmetrical Dimethylhydrazine, UDMH, Dimazine
Dimethyl Phthalate*	131-11-3	10	
Dimethyl Sulfate	77-78-1	0.1	Sulfuric Acid Dimethyl Ester, Methyl Sulfate
Dimethylaminoazobenzene, [4-]	60-11-7	1	N,N-Dimethyl-P-Phenylazo-Aniline, Benzeneazo Dimethylaniline
Dimethylaniline, [N,N-]	121-69-7	1	N,N-Diethyl Aniline, N,N-Dimethylphenylamine, DMA
Dinitro-O-Cresol, [4,6-] and salts	534-52-1	0.1	DNOC, 3,5-Dinitro-O-Cresol, 2-Methyl-4,6-Dinitrophenol
Dinitrophenol, [2,4-]	51-28-5	1	DNP
Dinitrotoluene, [2,4-]	121-14-2	0.02	Dinitrotoluol, DNT, 1-Methyl-2,4-Dinitrobenzene
Dioxane, [1,4-]	123-91-1	6	1,4-Diethyleneoxide, Diethylene Ether, P-Dioxane
Diphenylhydrazine, [1,2-]	122-66-7	0.09	Hydrazobenzene, N,N'-Diphenylhydrazine, N,N'-Bianiline, 1,1'-Hydrodibenzene
Diphenylmethane	101-68-8	0.1	Methylene Bis(Phenylisocyanate), Methylene

Diisocyanate, [4,4-]			Diphenyl Diisocyanate, MDI
Epichlorohydrin	106-89-8	2	1-Chloro-2,3-Epoxypropane, EPI, Chloropropylene Oxide, Chloromethyloxirane
Ethoxy Ethanol [2-]*	110-80-5	10	
Ethyl Acrylate	140-88-5	1	Ethyl Propenoate, Acrylic Acid Ethyl Ester
Ethyl Benzene*	100-41-4	10	
Ethyl Chloride*	75-00-3	10	
Ethylene Glycol*	107-21-1	10	
Ethylene Imine (Aziridine)	151-56-4	0.003	Azacyclopropane, Dimethyleneimine, Ethylenimine, Vinylamine, Azirane
Ethylene Oxide	75-21-8	0.1	1,2-Epoxyethane, Oxirane, Dimethylene Oxide, Anprolene
Ethylene Thiourea	96-45-7	0.6	2-Imidazolidinethione, ETU
Fluomine	62207-76-5	0.1	
Formaldehyde	50-00-0	2	Oxymethylene, Formic Aldehyde, Methanal, Methylene Oxide, Oxomethane
Glycol Ethers (except those specifically listed) ²		5	
Heptachlor	76-44-8	0.02	1,4,5,6,7,8,8A-Heptachloro-3A,4,7,7A-Tetrahydro-4,7-Methanoindiene
Hexachlorobenzene	118-74-1	0.01	Perchlorobenzene, HCB, Pentachlorophenyl Benzene, Phenyl Perchloryl
Hexachlorobutadiene	87-68-3	0.9	Perchlorobutadiene, 1,3-Hexachlorobutadiene, HCB
Hexachlorocyclopentadiene	77-47-4	0.1	HCCPD, HEX
Hexachloroethane	67-72-1	5	Perchloroethane, Carbon Hexachloride, HCE, 1,1,1,2,2,2-Hexachloroethane
Hexamethylene Diisocyanate, 1,6-	822-06-0	0.02	1,6-Diisocyanatohexane, 1,6-Hexanediol Diisocyanate
Hexamethylphosphoramide	680-31-9	0.01	Hexamethylphosphoric Triamide, HEMPA, Hexametapol, Hexamethylphosphoramide
Hydrazine	302-01-2	0.004	Methylhydrazine, Diamide, Diamine, Hydrazine Base
Hydrochloric Acid*	7647-01-0	10	
Hydrogen Fluoride	7664-39-3	0.1	Hydrofluoric Acid Gas, Fluorhydric Acid Gas, Anhydrous Hydrofluoric Acid
Hydrogen Selenide	7783-07-5	0.1	
Hydroquinone	123-31-9	1	Quinol, Hydroquinol, P-Diphenol, 1,4-Benzenediol, Hydrochinone, Arctuvin
Indeno(1,2,3-cd)Pyrene	193-39-5	0.01	
Isophorone*	78-59-1	10	
Lead and Compounds (except those specifically listed)	20-11-1	0.01	Lead (Acetate, Arsenate, Chloride, Fluoride, Iodide, Nitrate, Sulfate, Sulfide)
Lindane [Gamma-Hexachlorocyclohexane]	58-89-9	0.01	Benzene Hexachloride – Gamma Isomer
Maleic Anhydride	108-31-6	1	2,5-Furanediene, Cis-Butenedioic Anhydride, Toxicilic Anhydride
Manganese and Compounds (except those specifically listed)	20-12-2	0.8	Manganese (Acetate, Chloride, Dioxide, (II)-Oxide, (III)-Oxide, (II)-Sulfate
Mercury Compounds (except those specifically listed)	20-13-3	0.01	Mercury Compounds (Methyl-, Ethyl-, Phenyl-)
Mercury Compounds (Inorganic)	20-13-3	0.01	Mercury (Chloride, Cyanide, (I,II)-[Bromide, Iodide, Nitrate, Sulfate], Oxide)

Methanol*	67-56-1	10	
Methoxychlor*	72-43-5	10	
Methoxy Ethanol, [2-]*	108-86-4	10	
Methyl Bromide*	74-83-9	10	Bromomethane
Methyl Chloride*	74-87-3	10	Chloromethane
Methyl Chloroform*	71-55-6	10	1,1,1,-Trichloroethane
Methyl Hydrazine	60-34-4	0.06	Monomethylhydrazine, Hydrozomethane, 1-Methylhydrazine
Methyl Iodide	74-88-4	1	Idomethane
Methyl Isobutyl Ketone*	108-10-1	10	
Methyl Isocyanate	624-83-9	0.1	Isocyanatomethane, Isocyanic Acid, Methyl Ester
Methyl Methacrylate*	80-62-6	10	
Methyl Tert-Butyl Ether*	12108-13-3	10	
Methylcyclopentadienyl Manganese	12108-13-3	0.1	
Methylene Bis(2-Chloroaniline), [4,4-]	101-14-4	0.2	Curene, MOCA, 4,4'-Diamino-3,3'-Dichlorodiphenylmethane
Methylene Chloride*	75-09-2	10	Dichloromethane
Methylenedianiline, [4,4-]	101-77-9	1	4,4'-Diaminodipheylmethane, DDM, MDA, Bis(4-Aminophenyl)Methane, DAPM
Naphthanlene*	91-20-3	10	
Nickel Carbonyl	13463-39-3	0.1	
Nickel Compounds (except those specifically listed)		1	Nickel (Acetate, Ammonium Sulfate, Chloride, Hydroxide, Nitrate, Oxide, Sulfate)
Nickel Refinery Dust	12035-72-2	0.08	
Nickel Subsulfide		0.04	
Nitrobenzene	98-95-3	1	Nitrobenzoil, Oil of Mirbane, Oil of Bitter Almonds
Nitrobiphenyl, [4-]	92-93-3	1	4-Nitrodiphenyl, P-Nitrobiphenyl, P-Nitrophenyl, PNB
Nitrophenol, [4-]	100-02-7	5	4-Hydroxynitrobenzene, Para-Nitrophenol
Nitropropane, [2-]	79-46-9	1	Dimethylnitromethane, Sec-Nitropropane, Isonitropropane, Nitroisopropane
Nitroso-N-Methylurea, [N-]	684-93-5	0.0002	N-Methyl-N-Nitrosourea, N-Nitroso-N-Methylcarbamide
Nitrosodimethylamine, [N-]	62-75-9	0.001	Dimethylnitrosamine, DMN, DMNA
Nitrosomorpholine, [N-]	59-89-2	1	4-Nitrosomorpholine
Parathion	56-38-2	0.1	DNTP, Monothiophosphate, Diethyl-P-Nitrophenyl
PCB (Polychlorinated Biphenyls)	1336-36-3	0.009	Aroclors
Pentachloronitrobenzene	82-68-8	0.3	Quintobenzene, PCNB, Quiniozene
Pentachlorophenol	87-86-5	0.7	PCP, Penchlorol, Pentachlorophenate, 2,3,4,5,6-Pentachlorophenol
Phenol	108-95-2	0.1	Carbolic Acid, Phenic Acid, Phenylic Acid, Phenyl Hydrate, Hydroxybenzene
Phenyl Mercuric Acetate	62-38-4	0.01	
Phenylenediamine, [p-]*	106-50-3	10	
Phosgene	75-44-5	0.1	Carbonyl Chloride, Carbon Oxychloride, Carbonic Acid Dichloride
Phosphine	7803-51-2	5	Hydrogen Phosphide, Phosphoretted Hydrogen, Phosphorus Trihydride
Phosphorous (Yellow or White)	7723-14-0	0.1	
Phthalic Anhydride	85-44-9	5	Phthalic Acid Anhydride, Benzene-O-Dicarboxylic Acid Anhydride, Phthalandione
Polycyclic Organic Matter (except those specifically	TP15	0.01	POM, PAH, Polyaromatic Hydrocarbons,

listed)			
Potassium Cyanide	151508	0.1	
Propane Sultone, [1,3-]	1120-71-4	0.03	1,2-Oxathiolane-2,2-Dioxide, 3-Hydroxy-1-Propanesulphonic Acid Sultone
Propiolactone, [Beta-]	57-57-8	0.1	2-Oxeatanone, Propiolactone, BPL, 3-Hydroxy-B-Lactone-Propanoic Acid
Propionaldehyde	123-38-6	5	Propanal, Propyl Aldehyde, Propionic Aldehyde
Propoxur*	114-26-1	10	Baygone
Propylene Oxide	75-56-9	5	1,2-Epoxypropane, Methylethylene Oxide, Methyl Oxirane, Propene Oxide
Propyleneimine, [1,2-]	75-55-8	0.003	2-Methyl Aziridine, 2-Methylazacyclopropane, Methylethyleneimine
Quinoline	91-22-5	0.006	1-Azanaphthalene, 1-Benzazine, Benzo(B)Pyridine, Chinoline, Leucoline
Quinone	016-51-4	5	Benzoquinone, Chinone, P-Benzoquinone, 1,4-Benzoquinone
Selenium and Compounds (except those specifically listed)	7782-49-2	0.1	Selenium (Metal, Dioxide, Disulfide, Hexafluoride, Monosulfide)
Sodium Cyanide	143339	0.1	
Sodium Selenate	13410010	0.1	
Sodium Selenite	101020188	0.1	
Styrene	100-42-5	1	Cinnamene, Cinnamol, Phenethylene, Phenylethylene, Vinylbenzene
Styrene Oxide	96-09-3	1	Epoxyethylbenzene, Phenylethylene Oxide, Phenyl Oxirane, Epoxystyrene
Tetrachlorodibenzo-P-Dioxin	1746-01-6	6.00E-07	
Tetrachloroethane, [1,1,2,2-]	79-34-5	0.3	Sym-Tetachloroethane, Acetylene Tetrachloride, Ethane Tetrachloride
Tetrachloroethylene*	127-18-4	10	Perchloroethylene
Tetraethyl Lead	78-00-2	0.01	
Tetramethyl Lead	75-74-1	0.01	
Titanium Tetrachloride	7550-45-0	0.1	Titanium Chloride
Toluene*	108-88-3	10	
Toluene Diisocyanate, [2,4-]	584-84-9	0.1	TDI, Tolyene Diisocyanate, Diisocyanatoluene
Toluidine, [Ortho-]	95-53-4	4	Ortho-Aminotoluene, Ortho-Methylaniline, 1-Methyl-1,2-Aminobenzene
Toxaphene	8001-35-2	0.01	Chlorinated Camphene, Camphechlor, Polychlorcamphene
Trichlorobenzene*	120-82-1	10	
Trichloroethane, [1,1,2-]	79-00-5	1	Vinyl Trichloride, Beta-Trichloroethane
Trichloroethylene*	79-01-6	10	
Triethylamine*	121-44-8	10	
Trichlorophenol, [2,4,5-]	95-95-4	1	2,4,5-TCP
Trichlorophenol, [2,4,6-]	88-06-2	6	2,4,6-TCP
Trifluralin	1582-09-8	9	2,6-Dinitro-N-N-Dipropyl-4-(Trifluoromethyl)Benzeneamine
Trimethylpentane, [2,2,4-]	540-84-1	5	Isobutyltrimethylethane, Isoctane
Urethane [Ethyl Carbamate]	51-79-6	0.8	Ethyl Urethane, O-Ethylurethane, Leucothane, NSC 746, Urethan
Vinyl Acetate	108-05-4	1	Acetic Acid Vinyl Ester, Vinyl Acetate Monomer, Ethenyl Ethanoate
Vinyl Bromide	593-60-2	0.6	Bromoethylene, Bromoethene

Xylenes (isomers and mixtures)*	1330-20-7	10	
Xylene, m-*	108-38-3	10	
Xylene, o-*	95-47-6	10	
Xylene, p-*	106-42-3	10	

¹X'CN where X'H' or any other group where a formal dissociation may occur, for example, KCN or Ca(CN)₂

²Includes mono- and diethers of ethylene glycol, diethylene glycol and triethylene glycol R-(OCH₂CH₂)_n-OR' where n = 1, 2, or; R=Alkyl or aryl groups; R' R, H or groups which, when removed, yield glycol ethers with the structure R-(OCH₂CH₂)_n-OH. Polymers and ethylene glycol monobutyl ether are excluded from the glycol category.

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 July 25, 2011;
- 2) 2012 Emissions Inventory Questionnaire, received March 4, 2013; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit 0691-015, Issued June 28, 1991;
- 5) Construction Permit 0596-008, Issued May 3, 1996;
- 6) Construction Permit 0996-006, Issued September 10, 1996;
- 7) Construction Permit 1197-002, Issued October 14, 1997;
- 8) Construction Permit 0298-006, Issued January 20, 1998;
- 9) Construction Permit 062003-007, Issued May 5, 2003;
- 10) Construction Permit 122003-005, Issued November 14, 2003;
- 11) Construction Permit 062007-013, Issued June 28, 2007;
- 12) Construction Permit 082009-009, Issued August 20, 2009;
- 13) Construction Permit 102011-008, Issued October 17, 2011.

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 10-6.100, Alternate Emission Limits

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

- 1) Air Pollution Control Program Construction Permit #0691-015
This construction permit authorized the installation of four spray paint booths and two pyrolysis furnaces. The four spray paint booths were not installed. Therefore, Special Conditions #6 through #8 are not included in the Operating Permit. In addition, only one of the two authorized pyrolysis furnaces was installed. Special Conditions #1 through #3 were reworded to reference only one pyrolysis furnace.
- 2) Air Pollution Control Program Construction Permit #0596-008
This construction permit authorized the conversion of two existing solvent-based primer spray booths to water-based systems, the installation of a liquefied petroleum gas (LPG) 0.8 MMBtu/hr burner, and the installation of a fifth spray booth and associated equipment. According to Gary Norell, Hutchens Industries' Environmental/Safety Director, the LPG burner and spray booth were not installed. In addition, the solvent-based primer spray booths were not converted to water-based systems. Therefore, the equipment and Special Conditions associated with this construction permit were not included in the Operating Permit.
- 3) Air Pollution Control Program Construction Permit #0996-006
This construction permit authorized the modification of sawdust handling equipment and the installation of a propane-fired lumber drying kiln and a robotic welding line. In a December 31, 2003, David Gray of Hutchens Industries notified the Missouri Department of Natural Resources that the facility discontinued the lumber mill operations and sold the related equipment. In addition, according to Gary Norell, Hutchens Industries' Environmental/Safety Director, the robotic welding line was removed from the installation.
- 4) Air Pollution Control Program Construction Permit #1197-002
This construction permit authorized the installation of a plasma metal cutting torch (EU0170). The calculations shown in the construction permit to determine the particulate matter emission rate contained errors. The correct emission factor is 1.99 lb PM/ton steel. The correct MHDR is 0.96 ton/hr. These values were used in determining compliance with 10 CSR 10-6.400.
- 5) Air Pollution Control Program Construction Permit #082009-009
This construction permit authorized the installation of a dip coating operation which includes Emission Units EU0330, EU0340A, EU0340B and EU0350. Special Condition 3 of this permit required the permittee to submit within 120 days of permit issuance the potential to emit calculations for the entire installation, including fugitive sources, volume sources, area and point sources. The permittee has fulfilled this requirement so it was not rested in the operating permit.

New Source Performance Standards (NSPS) Applicability

None.

Maximum Achievable Control Technology (MACT) Applicability

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

40 CFR Part 63, Subpart M, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Production*

The facility was previously subject to this regulation and it was included in the previous operating permit. However, because the permittee requested the plant-wide emission limits for VOC and HAPs below major levels, this facility is no longer subject to this rule and it was not included in this operating permit renewal.

40 CFR Part 63, Subpart JJJJJJ, *National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources*

This regulation does not apply to the process heaters at this facility because they are less than 10.0 MMBtu/hr and burn only natural gas.

40 CFR Part 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

This regulation does not apply to this facility because it does not have paint stripping operations that involve the use of chemical strippers than contain methylene chloride and does not apply coatings containing compounds of chromium, lead, manganese, nickel or cadmium.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	5.73
CO ₂ e	16,309
HAP	Less than 10 (Individual) and Less than 25 (total)
NO _x	19.74
PM ₁₀	39.61
PM ₂₅	39.61
SO _x	0.12
VOC	Less than 100

Potential to Emit for CO, NO_x, and SO_x was taken from the most recent construction permit, Construction Permit No. 102011-008. Potential Emissions for PM₁₀ and PM_{2.5} were provided by the facility with the operating permit renewal. Potential to emit for HAP and VOC are limited by Plant-Wide Permit Condition PW001 to below major levels. Potential to Emit for CO₂e was calculated using information from the permit application and the latest EIQ data.

Other Regulatory Determinations

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

Combustion units that use exclusively pipeline grade natural gas, as defined in 40 CFR 72.2, are exempt from this rule. Therefore, the Curing Oven (EP-030) and the Pyrolysis Furnaces (EU0160 and EU0360) are not subject to this rule.

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

This rule applies to the Paint Spray Booths (EU0090 through EU0110). As an alternative to the PM emission rate limitations established by 10 CSR 10-6.400(3)(A)1., the permittee has demonstrated compliance to a PM concentration limit, based on source gas volume, as specified in 10 CSR 10-6.400(3)(A)2., Table I.

PM Emission Rate Compliance

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

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

Emission Unit ID	Assoc. Equip.	MHDR (gal/hr)	Density (lb/gal)	MHDR (ton/hr)	% solids	Overall Control Efficiency (%)	Transfer (%)	Potential Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)
EU0090	Booth #1	17.5	11.488	0.10	65.96	79.81	65	9.37	0.88
EU0100	Booth #2	8.75	11.488	0.05	65.96	79.81	65	4.69	0.55
EU0110	Booth #3	8.75	11.488	0.05	65.96	79.81	65	4.69	0.55

PM Concentration Compliance

$$\text{Emission rate (gr/dscf)} = \text{Emission Rate (lb/hr)} * 7000 \text{ (grains/lb)} / \text{Stack flow rate (SCFM)} / 60 \text{ (min/hr)}$$

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

Emission Unit ID	Assoc. Equip.	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
				ACFM	SCFM		
EU0090	Booth #1	9.37	77	30,000	29,497	0.0371	0.0625
EU0100	Booth #2	4.69	77	20,000	19,665	0.0278	0.0716
EU0110	Booth #3	4.69	77	16,000	15,732	0.0347	0.0787

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

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

10 CSR 10-6.400 was not applied to the Pyrolysis Furnace (EU0160) since the unit has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter and is therefore exempt according to §(1)(B)11. 10 CSR 10-6.220 was not applied since it is highly unlikely that equipment that has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter would ever exceed the 20% opacity threshold required by this rule.

Emission Unit ID	Associated Equip.	Process Weight Rate	PM Emission Factor	Emission Factor Reference	Potential Uncontrolled Emission Rate (lb/hr)
EU0160	Pyrolysis Furnace	0.3 MMBtu/hr	0.12 ton/8760 hr	Performance Test	0.03

Notes:

1. PM emission factor from Performance Test reported in Construction Permit #0691-015

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

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

The Curing Oven (EP-030) may emit air contaminants from the associated operation in addition to the products of combustion. However, it is highly unlikely that emissions will result in an exceedance of 10 CSR 10-6.220 or 10 CSR 10-6.400. Therefore, these rules were not applied to this unit.

The Dip Paint Operations (EU0130 and EU0330) are highly unlikely to exceed the limits of 10-6.220 or 10-6.400. Therefore, these rules were not applied to these units.

Welding Machines

In 2003, Hutchens Industries was issued Construction Permit #122003-005 which authorized the installation of a new welding assembly area. In Permit #122003-005, the facility reported that there will be a total of 360 welding machines installed at the facility. These machines are located in 3 buildings and are moved from building to building, as needed, for production. With the exception of the four welding booths EU0180 through EU0210, the welding machines exhaust into the buildings. Their exhaust then exits through the buildings' ventilation system. Therefore, with the exception of EU0180 through EU0210, the welding machines are considered fugitive sources. And as fugitive sources, the machines are exempt from 10 CSR 10-6.400 by §(1)(B)(7). In addition, the welding machines do not have the potential to exceed the limitation of 10 CSR 10-6.220. These units were classified as emission units without limitations.

10 CSR 10-6.065, Operating Permits

The following units are fueled by natural gas and do not have the potential to exceed the limitation of 10 CSR 10-6.220, 10 CSR 10-6.260 and 10 CSR 10-6.400, therefore these units were classified as emission units without limitations.

Space Heaters, natural gas heaters, <10 MMBtu/hr each	(EP-017)
Alkaline Wash	(EP-29A)
Phosphate Wash	(EP-029B)
Alkaline Wash	(EU0340A)
Iron Phosphate Wash	(EU0340B)
Paint Curing System	(EU0350)

In a letter received by the Air Pollution Control Program on July 23, 2007, Hutchens Industries confirms that they have removed their steel foundry, as well as welding operations and surface coating of metal parts. Consequently, all permit conditions, emission limitations, reporting requirements, recordkeeping, and monitoring requirements relating to the foundry operation no longer apply.

In a letter received by the Air Pollution Control Program on July 25, 2011, along with the Operating Permit Renewal application, Hutchens Industries confirms that they have removed the following equipment:

EP-001 Ladle and Lid Curing Burners, 6 natural gas burners
EP-003 Core machine
EP-004A Pouring of Molten Metal
EP-008 Steel Annealing Furnace
EP-027 Spray Paint Booth #4
EU0140 Dip Paint Operation #2

Consequently, all permit conditions, emission limitations, reporting requirements, recordkeeping, and monitoring requirements relating these pieces of equipment no longer apply.

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:

Jill Wade, P.E.
Environmental Engineer

Mr. Kevin Dobson
Hutchens Industries, Inc. Mansfield Facility
P.O. Box 137
Mansfield, MO 65704

Re: Hutchens Industries, Inc. Mansfield Facility, 229-0001
Permit Number: **OP2013-049**

Dear Mr. Dobson:

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/jwk

Enclosures

c: Southwest Regional Office
PAMS File: 2011-07-063

Kevin Dobson
Director of Human Resources
Hutchens Industries, Inc.
Mansfield, MO 65704

RE: Intermediate Operating Permit, Project: 2011-07-063
Response to Comments

Dear Mr. Dobson:

The Missouri Air Pollution Control Program (APCP) has received no comments submitted during the public comment period on the draft Intermediate Operating Permit for Hutchens Industries, Inc. in Mansfield, MO. The operating permit is being issued, and a copy will be sent to you under separate cover.

If you have any questions or additional comments, please contact me at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Jill Wade, P.E.
Environmental Engineer

Enclosure: Proposed Final Title V Operating Permit
Response to Public Comments

c: PAMS File2011-07-063
Southwest Regional Office

MEMORANDUM

DATE: July 16, 2013
TO: Kevin Dobson – Hutchens Industries, Inc.
FROM: Jill Wade, Environmental Engineer
SUBJECT: Response to Public Comments

No comments were received.

JW/kjc