



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

OCT 06 2017

Mr. Kevin Dobson  
HR Director  
Hutchens Industries, Inc.  
898 East Commercial  
Mansfield, MO 65704

RE: Intermediate Operating Permit Modification - Permit Number: OP2013-049A  
Project Number: 2017-04-027; Installation Number: 229-0001

Dear Mr. Dobson:

Your Intermediate Operating Permit OP2013-049 is being modified in response to your April 07, 2017 request. The request was for incorporation of Construction Permit #012017-011 and associated emission units into the current operating permit. This amendment also includes the reactivation request that was submitted March 03, 2015 for Spray Paint Booth #4.

Your operating permit has been revised by removing Permit Conditions PW001 and PW002, and adding Permit Conditions PW003, (EU0400-0410)-001, (EU0400-0410)-002, and EU0410-003. Permit Conditions PW001 and PW002 are being combined and replaced by Permit Condition PW003 in order to incorporate the new equipment into the plant wide limitations. Permit Condition (EU0400-0410)-001 and (EU0400-0410)-002 have been added to the operating permit to include the proper state regulations for the new and reactivated emission units. Permit Condition EU0410-003 has been added to the permit in order to incorporate the new special conditions from the construction permit and to include the control device requirements for the new emission unit.

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



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Mr. Dobson  
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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 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

Please add this letter and attached amendments to the end of Intermediate Operating Permit OP2013-049. A copy of this letter and attached amendments should be kept with the operating permit and made available to Department of Natural Resources' personnel upon request.

If you have any questions regarding this modification, please do not hesitate to contact me, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:dbj

Enclosures

c: Southwest Regional Office  
PAMS File: 2017-04-027



## INTERMEDIATE PERMIT TO OPERATE

**Operating Permit Number:** OP2013-049B  
**Installation Name:** Hutchens Industries, Inc.  
**Installation ID:** 229-0001  
**Project Number:** 2017-04-027

### **Description of Intermediate Modification:**

Hutchens Industries, Inc. submitted a request dated April 07, 2017 for incorporation of Construction Permit #012017-011 and associated emission units into the current operating permit. The following permit conditions have been added to Intermediate Operating Permit OP2013-049:

### **PERMIT CONDITION PW003**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit #012017-011, Issued January 18, 2017  
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation

### **Emission Limitations:**

- 1) The permittee shall emit less than 100.0 tons of Volatile Organic Compounds (VOCs) in any consecutive 12-month period from the entire installation. [Voluntary Limitation]
- 2) The permittee shall emit less than 10.0 tons individually and 25.0 combined of HAPs in any consecutive 12-month period from the entire installation. [Special Condition 1.B.]

### **Monitoring/Recordkeeping:**

- 1) The permittee shall develop and use forms to demonstrate compliance with the VOC and HAPs emission limitations. The forms shall contain, at a minimum, the following information: [Special Condition 1.C.]
  - a) Installation name and ID Number
  - b) Permit Number
  - c) Current month and 12-month date range
  - d) Monthly throughput for each emission unit that emits VOCs/HAPs in the current month
  - e) Emission factors for each applicable emission unit
  - f) Monthly emissions for each applicable emission unit
  - g) Total monthly emissions for each applicable emission unit
  - h) 12-month rolling total for VOCs/HAPs that includes the sum of all startup, shutdown, and malfunction emissions, as reported to the Air Pollution Control Program's Compliance/Enforcement Section
  - i) Indication of compliance with the emission limitations
- 2) The permittee shall maintain all records required by this permit condition for not less than five years and shall make them available immediately available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used. [Special Condition 5.A.]

**Reporting:**

- 1) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO, 65102, no later than 10 days after the end of the month during which any record shows an exceedance of the limitations of this permit condition. [Special Condition 5.B.]

<b>PERMIT CONDITION (EU0400-EU0410)-001</b>			
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants			
<b>Emission Unit #</b>	<b>General Description</b>	<b>Manufacturer/ Model #</b>	<b>EQ Reference #</b>
EU0400	Spray Paint Booth #4; Painting of metal parts and products; MHDR 2.45 gal/hr; equipped with nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; installed 1998	In-house	EP-27
EU0410	Spray Paint Booth #5: Installed 01/31/2017; Controlled by Mat Fabric Filters; Control Efficiency 80%; Capture Efficiency 98.67%	In-house	EP-13D

**Emission Limitations:**

- 1) The permittee shall not 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: The permittee 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 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. 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 Compliance/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) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

<b>PERMIT CONDITION (EU0400-0410)-002</b>			
<b>10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes</b>			
<b>Emission Unit #</b>	<b>General Description</b>	<b>Manufacturer/ Model #</b>	<b>EIQ Reference #</b>
EU0400	Spray Paint Booth #4; Painting of metal parts and products; MHDR 2.45 gal/hr; equipped with nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; installed 1998	In-house	EP-27
EU0410	Spray Paint Booth #5: Installed 01/31/2017; Controlled by Mat Fabric Filters; Control Efficiency 80%; Capture Efficiency 98.67%	In-house	EP-13D

**Emission Limit:**

- 1) The permittee shall not emit particulate matter from EU0400 in a concentration in excess of 0.0875 grain per standard cubic feet of exhaust gases.
- 2) The permittee shall not emit particulate matter from EU0410 in a concentration in excess of 0.0235 grain per standard cubic feet of exhaust gases.
- 3) 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 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:**

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

<b>PERMIT CONDITION EU0410-003</b>			
10 CSR 10-6.060 Construction Permits Required Construction Permit #012017-011, Issued January 18, 2017			
<b>Emission Unit #</b>	<b>General Description</b>	<b>Manufacturer/Model #</b>	<b>EIQ Reference #</b>
EU0410	Spray Paint Booth #5: Installed 01/31/2017; Controlled by Mat Fabric Filters; Control Efficiency 80%; Capture Efficiency 98.67%	In-house	EP-13D

**Operational Limitations:**

The permittee shall use no more than two (2) paint guns at a time in EU0410. [Special Condition 2]

**Capture Device Requirements:**

- 1) The permittee shall capture emissions from the paint booth by operating according to the manufacturer's specifications. [Special Condition 3.A.]
- 2) The permittee shall ensure all doorways into the booth are closed during operation, and all fresh air vents are equipped with visual indicators, such as streamers, that show air flow into the booth. Such indicators are not required at the conveyor entry/exit. [Special Condition 3.B.]

**Control Device Requirements:**

- 1) The permittee shall control emissions from the paint booth using fabric filters. [Special Condition 4.A.]
- 2) The permittee shall operate and maintain the filters in accordance with the manufacturer's specifications. [Special Condition 4.B.]
- 3) The permittee shall keep replacement filters on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, abrasion resistance). [Special Conditions 4.C.]
- 4) The permittee shall keep a copy of the filter manufacturer's performance warranty on site. [Special Condition 4.D.]

**Recordkeeping:**

- 1) The permittee shall maintain an operating and maintenance log for the paint booth, which shall include the following. [Permit Condition 4.E.]
  - a) Incidents of Malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

- 2) The permittee shall maintain all records required by this permit condition for not less than five years and shall make them available immediately available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used. [Special Condition 5.A.]

**Reporting:**

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