

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

MAR 12 2019

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

Re: Hutchens Industries, Inc., 229-0001
Permit Number: OP2019-011

Dear Mr. Dobson:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:nwj

Enclosures

c: PAMS File: 2018-06-023





PART 70

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.

Operating Permit Number: OP2019-011

Expiration Date: MAR 12 2024

Installation ID: 229-0001

Project Number: 2018-06-023

Installation Name and Address

Hutchens Industries, Inc.
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

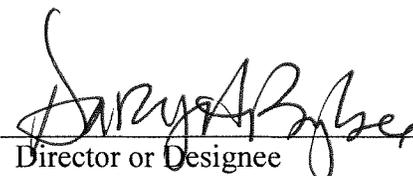
Installation Description:

Hutchens Industries, Inc. operates an installation in Mansfield, Missouri that manufactures truck trailer suspensions. Operations at the installation include welding and surface coating of metal parts. The installation is a synthetic minor NSR source, a synthetic area HAP source, and a Title V major source of VOC. The installation is not a named source, therefore fugitive emissions are not counted towards major source applicability.

The installation is subject to 40 CFR part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and 40 CFR part 63 Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.

MAR 12 2019

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Equipment Listing

Emission Units With Limitations

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

Emission Point #	Description
EP-012A	Robotic Welding Booth #1
EP-012B	Robotic Welding Booth #2
EP-012C	Robotic Welding Booth #3
EP-012D	Robotic Welding Booth #4
EP-012E	Robotic Welding Booth #5
EP-012F	Robotic Welding Booth #6
EP-012G	Robotic Welding Booth #7
EP-012H	Robotic Welding Booth #8
EP-013A	Spray Booth #1
EP-013B	Spray Booth #2
EP-013D	Spray Booth #5
EP-019	Pyrolysis Furnace #1
EP-026	Plasma Torch
EP-027	Spray Booth #4
EP-032	Combined Welding
EP-033	Dip Tank
EP-034A	Alkaline Wash #2
EP-034B	Phosphate Wash #2
EP-035	Curing Oven #2
EP-036	Pyrolysis Furnace #2
EP-037	Gasoline Storage Tank

Emission Units Without Specific Limitations

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

Emission Point #	Description
EP-013E	Curing Oven #3
EP-017	Space Heaters, Natural Gas
EP-028	Dip Paint Operation #1
EP-029A	Alkaline Wash
EP-029B	Phosphate Wash
EP-030	Curing Oven #1
EP-031	Dip Paint Operation #2 Haul Roads

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. This section applies to regulations that apply on an entire-installation wide basis.

Permit Condition 012017-011 Plant Wide
10 CSR 10-6.060, Construction Permits Required
Construction Permit #012017-011, Issued January 18, 2017

Emission Limitation:

1. The permittee shall emit less than 250.0 tons of Volatile Organic Compounds (VOCs) in any consecutive 12 month period from the entire installation. [Special Condition #1.A.]
2. The permittee shall emit less than 10.0 tons individually and 25.0 tons combined Hazardous Air Pollutants (HAPs) in any consecutive 12 month period from the entire installation. [Special Condition #1.B.]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the plant wide emissions of VOCs on a monthly and consecutive 12 month basis. The permittee shall use Attachment Plant Wide VOCs, or equivalent, to demonstrate compliance.
2. The permittee shall monitor and record the plant wide individual and combined HAPs on a monthly and consecutive 12 month basis. The permittee shall use Attachment Plant Wide Individual HAPs and Attachment Plant Wide Combined HAPs, or equivalents, to demonstrate compliance.
3. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

Reporting:

1. The permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than ten days following the end of the month.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

III. Emission Unit Specific Emission Limitations

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

Permit Condition MACT HHHHHH		
40 CFR part 63 Subpart A, General Provisions		
40 CFR part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources		
EP #	Description	Manufacturer/ Model
EP-013A	Spray Booth #1; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house
EP-013B	Spray Booth #2; painting of metal parts and products; MHDR 8.75 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house
EP-013D	Spray Booth #5; painting of metal parts and products; with conveyor system and two paint guns; MHDR 4.95 gal/hr; controlled by fabric mat filter with 98.67% capture efficiency and 80% control efficiency, constructed 1/31/2017.	In house
EP-027	Spray Booth #4; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house

Applicability:

The following conditions apply until the exemption is granted by the Administrator. Upon receipt of the exemption, this permit condition shall no longer apply.

Operational Limitations:

1. The permittee must meet the requirements in §63.11173(e)(1) through (e)(5). [§63.11173(e)]
 - a. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in §63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in §63.11173(f). The requirements of §63.11173(e)(1) do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of §63.11173(e)(1). [§63.11173(e)(1)]
 - b. All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of §63.11173(e)(2)(i) and either §63.11173(e)(2)(ii), (e)(2)(iii), or (e)(2)(iv). [§63.11173(e)(2)]
 - i. All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the

American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of 40 CFR part 63, Subpart A). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of §63.11173(e)(2)(i) do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications. [§63.11173(e)(2)(i)]

- ii. Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure. [§63.11173(e)(2)(ii)]
 - iii. Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process. [§63.11173(e)(2)(iii)]
 - iv. Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray. [§63.11173(e)(2)(iv)]
- c. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of 40 CFR part 63 Subpart A). [§63.11173(e)(3)]
- d. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [§63.11173(e)(4)]

- e. As provided in §63.6(g), the Administrator may choose to grant the permittee permission to use an alternative to the emission standards in this section after the permittee has requested approval to do so according to §63.6(g)(2). [§63.11173(e)(5)]
2. The permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by §63.11173(e)(1). The training program must include, at a minimum, the items listed in §63.11173(f)(1) through (f)(3). [§63.11173(f)]
 - a. A list of all current personnel by name and job description who are required to be trained; [§63.11173(f)(1)]
 - b. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in §63.11173(f)(2)(i) through (2)(iv). [§63.11173(f)(2)]
 - i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. [§63.11173(f)(2)(i)]
 - ii. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. [§63.11173(f)(2)(ii)]
 - iii. Routine spray booth and filter maintenance, including filter selection and installation. [§63.11173(f)(2)(iii)]
 - iv. Environmental compliance with the requirements of this regulation. [§63.11173(f)(2)(iv)]
 - c. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. The permittee who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in §63.11173(f)(2) are not required to provide the initial training required by §63.11173(f)(2) to these painters. [§63.11173(f)(3)]
3. As required by §63.11173(e)(1), all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in §63.11173(g)(1) and (2). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. [§63.11173(g)]
 - a. For EP-013D and any future new sources: All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in §63.11173(f)(2) satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. [§63.11173(g)(1)]
 - b. For EP-013A, EP-013B, and EP-027: For all existing sources, all personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in §63.11173(f)(2) satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. [§63.11173(g)(2)]
 - c. Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of §63.11173(g) and be re-certified every five years. [§63.11173(g)(3)]

General Provisions:

Table 1 of MACT HHHHHH shows which parts of the General Provisions in 40 CFR part 63 Subpart A apply. [§63.11174(a)]

Notifications:

Notification of Compliance Status. For EP-013D and any future new sources: the permittee is not required to submit a separate notification of compliance status in addition to the initial notification specified in §63.11175(a) provided the permittee was able to certify compliance on the date of the initial notification, as part of the initial notification, and the compliance status has not since changed. [§63.11175(b)]

Recordkeeping:

1. The permittee shall keep the following records:
 - a. Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed. [§63.11177(a)]
 - b. Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i). [§63.11177(b)]
 - c. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4). [§63.11177(c)]
 - d. Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176. [§63.11177(d)]
 - e. Records of any deviation from the requirements in §63.11173, §63.11174, §63.11175, or §63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. [§63.11177(g)]
 - f. Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report. [§63.11177(h)]
2. The permittee must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. [§63.11178(a)]

Reporting:

1. Annual Notification of Changes Report. The permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under §63.11176(a), has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in §63.11176(a)(1) through (2). [§63.11176(a)]
 - a. The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. [§63.11176(a)(1)]

- b. The name, title, address, telephone, e-mail address (if available) and signature of the permittee, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this regulation or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. [§63.11176(a)(2)]
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All notification, reports, and certifications shall be submitted to the Administrator at US EPA Region 7, 11201 Renner Blvd., Lenexa, KS 66219 with copies to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Permit Condition MACT CCCCCC 10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart A General Provisions Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	
EP #	Description
EP-037	Gasoline Storage Tank, 300 gallon capacity

Applicability:

1. The permittee with a GDF with a monthly throughput of less than 10,000 gallons of gasoline must comply with the requirements in §63.11116. [§63.11111(b)]
2. The permittee shall, upon request by the Administrator, demonstrate the monthly throughput is less than 10,000 gallons. Recordkeeping to document monthly throughput must begin in January 10, 2008. [§63.11111(e)]
3. If the throughput of the GDF ever exceeds an applicable throughput threshold, the permittee shall remain subject to the requirements for sources above the threshold, even if the throughput later falls below the applicable throughput threshold. [§63.11111(i)]

Emission Limitations:

1. The permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11115(a)]
2. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)(1) through (4)]
 - a. Minimize gasoline spills;
 - b. Clean up spills as expeditiously as practicable;
 - c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

- d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- 3. The permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of this part, but must have records available within 24 hours of a request by the Administrator to document the gasoline throughput. [§63.11116(b)]
- 4. The permittee must comply with the requirements of this subpart by the applicable dates specified in §63.11113. [§63.111165(c)]
- 5. Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with §63.1116(a)(3). [§63.11116(d)]

Recordkeeping:

- 1. The permittee shall keep records as specified in §63.11125(d)(1) and (2). [§63.11125(d)]
 - a. Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.11125(d)(1)]
 - b. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.11125(d)(2)]
- 2. The permittee shall maintain all records required by this permit, for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

- 1. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
- 2. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Permit Condition 0691-015 10 CSR 10-6.060, Construction Permits Required Construction Permit #0691-015, Issued June 28, 1991		
EP #	Description	Manufacturer/Model #
EP-019	Pyrolysis Furnace #1; Controlled pyrolysis cleaning furnace which cleans nonhazardous paint from paint line hooks; fired with pipeline grade natural gas; MHDR 0.3 MMBtu; constructed 1993	Pollution Control Products/ Model PTR-88

Operational Limitation:

- 1. The permittee shall not process plastic or Teflon materials in the emission unit listed above. A permit modification shall be obtained from the Missouri Department of Natural Resources prior to any change in the type or quantities of materials process in the emission unit listed above, other than what is contained in the original construction permit application. [Special Condition #1]

2. The permittee shall ensure that operating personnel have adequate training and knowledge of the operation of the emission unit listed above. Training shall include the manufacturer's standard operating procedures. [Special Condition #2]
3. The permittee shall operate the emission unit listed above in accordance with the manufacturer instruction and guidelines of operation. [Special Condition #3]

Monitoring/Recordkeeping:

1. The permittee shall monitor the materials processed in the emission unit listed above to ensure only materials contained in the construction permit are used. The permittee shall keep a copy of Construction Permit #0691-015 at the installation. [Special Condition #5]
2. The permittee shall keep copies of the manufacturer's instructions and guidelines at the installation. [Special Condition #4]
3. The permittee shall keep training records for all personnel authorized to operate the controlled pyrolysis cleaning furnace.
4. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
2. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Permit Condition 082009-009		
10 CSR 10-6.060, Construction Permits Required		
Construction Permit #082009-009, Issued August 20, 2009		
EP #	Description	Manufacturer/ Model #
EP-033	Dip Tank; 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-034A	Alkaline Wash #2; 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-034B	Phosphate Wash #2; Iron phosphate wash – 600 gallon heated tank with 0.706 MMBtu/hr burner and 6000 gallon non heated rinse tank; Constructed 8/20/2009	In house
EP-035	Curing Oven #2; 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; Constructed 8/20/2009	In house

Emission Limitations:

The permittee shall emit less than 40.0 tons of volatile organic compounds (VOCs) from the equipment listed above in any consecutive 12 month period. [Special Condition #1.A.]

Alternative Coatings:

1. When considering using an alternative material in the W/R Dip tank (EP-033) that is different than a material listed in the application for this construction permit, the permittee shall calculate the potential emissions of VOCs and each individual Hazardous Air Pollutant (HAP) in the alternative material. [Special Condition 2.A.]
2. The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases: [Special Condition 2.B.]
 - 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. [Special Condition 2.B.i.]
 - 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 the SMAL table. [Special Condition 2.B.ii.]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the total monthly and consecutive 12 month VOC emissions from the equipment listed above. The permittee shall use Attachment 082009-009, or an equivalent, to demonstrate compliance.
2. The permittee shall monitor and record the VOC and individual HAP emissions from any alternative coatings. The permittee shall use Attachment 082009-009 Alternatives and Attachment SMAL, or equivalents, to demonstrate compliance.
3. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

Reporting:

1. The permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than ten days following the end of the month.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Permit Condition 102011-008		
10 CSR 10-6.060, Construction Permits Required		
Construction Permit #102011-008A, Issued November 29, 2011		
EP #	Description	Manufacturer/ Model #
EP-036	Pyrolysis Furnace #2; Controlled pyrolysis cleaning furnace which cleans nonhazardous paint from paint line hooks; fired with pipeline grade natural gas MHDR 0.3 MMBtu/hr; Constructed July 21, 2011. Controlled by Direct Flame Afterburner.	In house

Emission Limitation:

The permittee shall emit less than 10% opacity from the emission unit listed above at all times. [Special Condition #1.E.]

Operational Limitations:

1. The permittee shall use this emission unit exclusively to remove non-chlorinated/non-hazardous coatings from metal parts. [Special Condition #2.A.]
2. The permittee shall use only natural gas for combustion in this emission unit. [Special Condition #2.B.]
3. The permittee shall use a direct flame afterburner to control emissions from this emission unit. The afterburner shall be operated at a temperature of at least 1,400° Fahrenheit with more than a one-half second residence time to ensure a minimum combustion efficiency of 99.9%. [Special Condition #2.C.]
4. The permittee shall equip this emission unit 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 ±2%. [Special Condition #2.D.]

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures in US 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. [Special Condition #2.E.1)]
2. The permittee shall conduct observations on the schedule specified in Permit Condition 6.220.
3. If visible emissions are observed, the permittee would then conduct an opacity observation using US EPA Method 9. [Special Condition #2.E.2)]

Recordkeeping:

1. The permittee shall maintain records of all observation results for each emission unit using Attachments Method 9 and Method 22, or equivalents, to demonstrate compliance.
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any exceedance of the emissions limitation no later than ten days after an exceedance of the emission limitation.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Permit Condition 012017-011		
10 CSR 10-6.060, Construction Permits Required Construction Permit #012017-011, Issued January 18, 2017		
EP #	Description	Manufacturer/ Model #
EP-013D	Spray Booth #5: Epoxy paint booth with conveyor system and two paint guns. MHDR=4.95 gallons/hr. Controlled by fabric mat filter. Constructed 1/31/2017.	In house

Operational Limitations:

1. The permittee shall use no more than 2 paint guns at a time in the emission unit listed above. [Special Condition #2.]
2. The permittee shall capture emissions from the paint guns by operating the spray booth listed above according to the manufacturer's specifications. [Special Condition #3.A.]
3. The permittee shall operate the booth with all doorways into the booth closed during operation, and all fresh air vents shall be equipped with visual indicators, such as streamers, that show air flow into the booth. Such indicators are not required at the conveyor entry/exit, because they may restrict operation of the conveyor and/or damage freshly painted parts. [Special Condition #3.B.]
4. The permittee shall control emissions from the emission unit listed above using fabric filters. [Special Condition 4.A.]
5. The permittee shall operate and maintain the filters in accordance with the manufacturer's specifications. [Special Condition #4.B.]
6. 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, and abrasion resistance). [Special Condition #4.C.]

Monitoring/Recordkeeping:

1. The permittee shall maintain a copy of the filter manufacturer's performance warranty on site. [Special Condition #4.D.]
2. The permittee shall maintain a copy of the paint booth manufacturer's specifications on site.
3. The permittee shall observe the visual indicators once per shift and shall maintain the visual indicators in proper working condition.
4. The permittee shall maintain an operating and maintenance log for the emission unit listed above, which shall include the following information. The permittee shall use Attachment I/M Log, or equivalent, to demonstrate compliance. [Special 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.
5. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.

2. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Permit Condition 6.400			
10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes			
EP #	Description	Manufacturer /Model	Limit
EP-012A	Robotic Welding Booth #1; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-012B	Robotic Welding Booth #2; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-012C	Robotic Welding Booth #3; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-012D	Robotic Welding Booth #4; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-012E	Robotic Welding Booth #5; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-012F	Robotic Welding Booth #6; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-012G	Robotic Welding Booth #7; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-012H	Robotic Welding Booth #8; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA	0.100 gr/scf
EP-013A	Spray Booth #1; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house	0.061 gr/scf
EP-013B	Spray Booth #2; painting of metal parts and products; MHDR 8.75 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house	0.070 gr/scf
EP-013D	Spray Booth #5; painting of metal parts and products; with conveyor system and two paint guns; MHDR 4.95 gal/hr; controlled by fabric mat filter with 98.67% capture efficiency and 80% control efficiency, constructed 1/31/2017.	In house	0.056 gr/scf
EP-027	Spray Booth #4; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house	0.096 gr/scf

Emission Limitations:

The permittee shall not emit particulate matter in a concentration in excess of the limitations shown in the table above.

Operational Limitations:

1. The permittee shall operate the filter system at all times the associated spray booth is in operation.
2. The permittee shall operate and maintain the filter and spray booth systems in accordance with the manufacturer's specifications.
3. The permittee shall inspect the filter and spray booth systems for holes, imperfections, proper installation, and proper operation. Inspections shall occur once per shift.

Monitoring/Recordkeeping:

1. Robotic Welding units demonstrate compliance by calculations shown in the Statement of Basis. No additional monitoring or recordkeeping is required for the Robotic Welding units.
2. The permittee shall maintain a copy of the filter and spray booth manufacturer's specifications on site.
3. The permittee shall keep copies of all SDS for all materials used in the spray booths. If the SDS values differ from those detailed in the Statement of Basis, the permittee shall perform calculations demonstrating the particulate emissions comply with the emission limitations. The permittee shall keep all calculations and SDS on site.
4. The permittee shall maintain an operating and maintenance log for the filters and spray booths listed above, which shall include the following information. The permittee shall use Attachment I/M Log, or equivalent, to demonstrate compliance.
 - 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.
5. The permittee shall maintain all records required by this permit, including SDS for all materials, for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any exceedance of the emissions limitation no later than ten days after an exceedance of the emission limitation.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

Permit Condition 6.220		
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants		
EP #	Description	Manufacturer /Model
EP-012A	Robotic Welding Booth #1; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-012B	Robotic Welding Booth #2; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-012C	Robotic Welding Booth #3; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-012D	Robotic Welding Booth #4; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-012E	Robotic Welding Booth #5; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-012F	Robotic Welding Booth #6; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-012G	Robotic Welding Booth #7; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-012H	Robotic Welding Booth #8; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	NA
EP-013A	Spray Booth #1; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house
EP-013B	Spray Booth #2; painting of metal parts and products; MHDR 8.75 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house
EP-013D	Spray Booth #5; painting of metal parts and products; with conveyor system and two paint guns; MHDR 4.95 gal/hr; controlled by fabric mat filter with 98.67% capture efficiency and 80% control efficiency, constructed 1/31/2017.	In house
EP-026	Plasma Torch; dry plasma metal cutting torch used to cut 0.375 inch thick sheets of cold rolled steel; MHDR 0.96 ton steel/hr; constructed 1997	N/A
EP-027	Spray Booth #4; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	In house
EP-032	Combined Welding, MHDR 2.41 1000 lbs electrode/hr, E70S electrode; constructed 2003	Various

Emission Limitation:

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

3. Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

Monitoring:

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

Recordkeeping:

1. The permittee shall maintain records of all observation results for each emission unit using Attachments Method 9 and Method 22, or equivalents to demonstrate compliance.
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report any exceedance of the limitations no later than ten days after an exceedance of the emission limitation.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring and annual compliance certification reports required by Section V of this permit.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

1. The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2. Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
3. The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170

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

Emission Limitation:

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

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

1. The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
2. Should no violation of this regulation be observed during this period then-
 - a. The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b. If a violation is noted, monitoring reverts to weekly.
 - c. Should no violation of this regulation be observed during this period then-
 - i. The permittee may observe once per month.
 - ii. If a violation is noted, monitoring reverts to weekly.
3. If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment 6.170, or its equivalent, noting the following:

1. Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2. Whether equipment malfunctions contributed to an exceedance.
3. Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.250 Asbestos Abatement Projects

Certification, Accreditation, and Business Exemption Requirements

This is a State Only permit requirement.

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a. Applicable monitoring or testing methods, cited in:
 - i. 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii. 10 CSR 10-6.040, "Reference Methods";
 - iii. 10 CSR 10-6.070, "New Source Performance Standards";
 - iv. 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b. Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

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

in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

V. General Permit Requirements

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

Permit Duration

10 CSR 10-6.065(6)(C)1.B, 10 CSR 10-6.065(6)(E)3.C

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

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

1. Record Keeping
 - a. All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b. Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
2. Reporting
 - a. All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
 - b. The permittee shall submit a report of all required monitoring by:
 - i. October 1st for monitoring which covers the January through June time period, and
 - ii. April 1st for monitoring which covers the July through December time period.
 - c. Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d. Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i. Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A 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 semiannual report shall be reported on the schedule specified in this permit.
- e. Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
 - f. The permittee may request confidential treatment of information submitted in any report of deviation.

Risk Management Plan Under Section 112(r)

10 CSR 10-6.065(6)(C)1.D

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

Severability Clause

10 CSR 10-6.065(6)(C)1.F

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

General Requirements

10 CSR 10-6.065(6)(C)1.G

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 pursuant to 10 CSR 10-6.065(6)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(6)(C)1.H

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Reasonably Anticipated Operating Scenarios

10 CSR 10-6.065(6)(C)1.I

There are no reasonably anticipated operating scenarios.

Compliance Requirements

10 CSR 10-6.065(6)(C)3

1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a. Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3. All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a. Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4. The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and Part 64 exceedances and excursions 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.

Permit Shield

10 CSR 10-6.065(6)(C)6

1. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a. The applicable requirements are included and specifically identified in this permit, or
 - b. The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
2. Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a. The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b. Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c. The applicable requirements of the acid rain program,
 - d. The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e. Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions

10 CSR 10-6.065(6)(C)7

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.

Operational Flexibility

10 CSR 10-6.065(6)(C)8

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1. Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a. Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b. The permit shield shall not apply to these changes.

Off-Permit Changes

10 CSR 10-6.065(6)(C)9

1. Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
 - b. The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant

activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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.

- 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; and
- d. The permit shield shall not apply to these changes.

Responsible Official

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

The application utilized in the preparation of this permit was signed by Kevin Dobson, HR Director. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

Reopening-Permit for Cause

10 CSR 10-6.065(6)(E)6

This permit shall be reopened for cause if:

1. The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2. MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
3. 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,
4. The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
or
5. MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

10 CSR 10-6.065(6)(E)1.C

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment 082009-009

This sheet covers the period from _____ to _____.
 (month, year) (month, year)

Table 1: Mass Balance Worksheet for Dip Tank (EP-033), Alkaline Wash (EP-034A), Phosphate Wash (EP-034B), and Curing Oven (EP-035)

A	B	C	D	E
Material Used, (Name) ¹	Amount of Material Used (Include Units) ²	Density (lbs/gal) ³	VOC Content (Weight %) ⁴	VOC Emissions (Tons) ⁵
F. Total VOC Emissions from Mass Balance Materials (tons/month)⁶:				

¹ Record the name of each material used that contains a VOC as defined in 10 CSR 10-6.020.
² Record the usage and units of the material.
³ Record the material density. If density is not provided, the permittee may calculate the density by using the specific gravity and the following equation:

$$\left(\text{specific gravity} \right) * \left(\frac{8.34 \text{ lbs}}{\text{gallon}} \right) = \left(\text{density} \frac{\text{lb}}{\text{gallon}} \right)$$

⁴ Record the VOC content from the SDS. If VOC content has a range, then use the highest value.
⁵ Calculate the VOC emissions by one of the following methods:
 i. If the usage is in tons $(\text{Column B}) * (\text{Column D}) = \text{Column E}$
 ii. If usage is in pounds $(\text{Column B}) * \left(\frac{\text{Column D}}{2000} \right) = \text{Column E}$
 iii. If usage is in gallons $(\text{Column B}) * (\text{Column C}) * \left(\frac{\text{Column D}}{2000} \right) = \text{Column E}$
⁶ Sum of Column E.

Attachment Plant Wide VOCs (continued)

Table 2: Natural gas combustion for Alkaline Wash (EP-034A), Phosphate Wash (EP-034B), and Curing Oven (EP-035)

G	H	I
Monthly Natural Gas Usage for all units (MMCF) ⁷	VOC Emission Factor (lb/MMCF) ⁸	Monthly VOC Emissions (tons) ⁹
	5.5	
J. Total VOC Emissions from Combustion (tons/month):		

Table 3: Calculation of total monthly VOC and 12-month total VOCs

K. Sum of Column F and J for this month (tons) ¹⁰ :	
L. SSM Emissions for this month (tons) ¹¹ :	
M. Column O from previous month's worksheet (tons) ¹² :	
N. Column K from previous year's worksheet (tons) ¹³ :	
O. Current 12-month Total of VOC Emissions (tons)¹⁴:	

⁷ The installation shall record either the actual natural gas usage of the listed units or, in lieu of actuals, the combined maximum hourly design rate of all the listed units of 0.002623 MMCF/month (2.675 MMBtu).

⁸ Sourced from SCC 10200603.

⁹ Calculate the VOC emissions using the following equation: $(\text{Column G}) * \left(\frac{\text{Column H}}{2000}\right) = \text{Column I}$

¹⁰ Sum of all VOC emissions for this month.

¹¹ SSM emissions for this month, as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050

¹² This value is carried forward from the previous month's worksheet, and represents the 12 month total of VOC emissions as of the previous month

¹³ This value is carried forward from the previous year's worksheet, and represents the monthly VOC emissions for the same month in the previous year.

¹⁴ Current 12-month total VOC emissions. Calculated using the following equation:

$(\text{Column K}) + (\text{Column L}) + (\text{Column M}) - (\text{Column N}) = \text{Column O}$. **A total of less than 40.0 tons indicates compliance.**

Attachment SMAL

Chemical	CAS #	SMAL (ton/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (ton/yr)	Group ID	VOC	PM	Chemical
ACETALDEHYDE	75-07-0	9		Y	N	CARBARYL	63-25-2	10	V	Y	Y	DICHLOROPROPANE, [1,2-]
ACETAMIDE	60-35-5	1		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N	DICHLOROPROPENE, [1,3-]
ACETONITRILE	75-05-8	4		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N	DICHLORVOS
ACETOPHENONE	98-86-2	1		Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N	DIETHANOLAMINE
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CATECHOL	120-80-9	5		Y	N	DIETHYL SULFATE
ACROLEIN	107-02-8	0.04		Y	N	CHLORAMBEN	133-90-4	1		Y	Y	DIETHYLENE GLYCOL MONOBUTYL ETHER
ACRYLAMIDE	79-06-1	0.02		Y	N	CHLORDANE	57-74-9	0.01		Y	Y	DIMETHOXYBENZIDINE, [3,3-]
ACRYLIC ACID	79-10-7	0.6		Y	N	CHLORINE	7782-50-5	0.1		N	N	DIMETHYL BENZIDINE, [3,3-]
ACRYLONITRILE	107-13-1	0.3		Y	N	CHLOROACETIC ACID	79-11-8	0.1		Y	N	DIMETHYL CARBAMOYL CHLORIDE
ALLYL CHLORIDE	107-05-1	1		Y	N	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	DIMETHYL FORMAMIDE
AMINOBIIPHENYL, [4-]	92-67-1	1	V	Y	N	CHLOROBENZENE	108-90-7	10		Y	N	DIMETHYL HYDRAZINE, [1,1-]
ANILINE	62-53-3	1		Y	N	CHLOROBENZILATE	510-15-8	0.4	V	Y	Y	DIMETHYL PHTHALATE
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLOROFORM	67-66-3	0.9		Y	N	DIMETHYL SULFATE
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N	DIMETHYLAMINOAZOBENZENE, [4-]
ANTIMONY COMPOUNDS		5	H	N	Y	CHLOROPRENE	126-99-8	1		Y	N	DIMETHYLANILINE, [N-N-]
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y	DINITRO-O-CRESOL, [4,6-] (Note 6)
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHROMIUM COMPOUNDS		5	L	N	Y	DINITROPHENOL, [2,4-]
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	CHRYSENE	218-01-9	0.01	V	Y	N	DINITROTOLUENE, [2,4-]
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	COBALT COMPOUNDS		0.1	M	N	Y	DIOXANE, [1,4-]
ARSENIC COMPOUNDS		0.005	I	N	Y	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]
ASBESTOS	1332-21-4	0	A	N	Y	CRESOL, [META-]	108-39-4	1	B	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N	EPICHLOROHYDRIN
BENZENE	71-43-2	2		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N	ETHOXYETHANOL, [2-]
BENZIDINE	92-87-5	0.0003	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N	ETHOXYETHYL ACETATE, [2-]
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CUMENE	98-82-8	10		Y	N	ETHYL ACRYLATE
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N	ETHYL BENZENE
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	ODE	72-55-9	0.01	V	Y	Y	ETHYL CHLORIDE
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N	ETHYLENE GLYCOL
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DIAZOMETHANE	334-88-3	1		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER
BERYLLIUM SALTS		2E-05	J	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	ETHYLENE IMINE (AZIRIDINE)
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DIOXINS/FURANS		6E-07	D,V	Y	N	ETHYLENE OXIDE
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DIBENZOFURAN	132-64-9	5	V	Y	N	ETHYLENE THIOUREA
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	FORMALDEHYDE
BROMOFORM	75-25-2	10		Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETH
BROMOMETHANE	74-83-9	10		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y	GLYCOL ETHER (DIETHYLENE GLYCOL ET
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	HEPTACHLOR
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y	HEXACHLOROBENZENE
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	HEXACHLOROBUTADIENE
CADMIUM COMPOUNDS		0.01	K	N	Y	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N	HEXACHLOROCYCLOHEXANE, [ALPHA-]
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	HEXACHLOROCYCLOHEXANE, [BETA-]
CAPROLACTAM (Delisted)	105-60-2					DICHLOROMETHANE	75-09-2	10		N	N	HEXACHLOROCYCLOHEXANE, [DELTA-]
CAPTAN	133-06-2	10		Y	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	HEXACHLOROCYCLOHEXANE, [TECHNIC

Attachment SMAL (continued)

Chemical	CAS #	SMAL (ton/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (ton/yr)	Group ID	VOC	PM	Chemical
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N	TRIMETHYLPENTANE, [2,2,4-]
HEXACHLOROETHANE	67-72-1	5		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N	URETHANE [ETHYL CARBAMATE]
HEXAMETHYLENE, 1,6-DIISOCYANATE	822-06-0	0.02		Y	N	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N	VINYL ACETATE
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N	VINYL BROMIDE
HEXANE, [N-]	110-54-3	10		Y	N	PARATHION	56-38-2	0.1		Y	Y	VINYL CHLORIDE
HYDRAZINE	302-01-2	0.004		N	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y	XYLENE, [META-]
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N	XYLENE, [ORTHO-]
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N	XYLENE, [PARA-]
HYDROQUINONE	123-31-9	1		Y	N	PHENOL	108-95-2	0.1		Y	N	XYLENES (MKED ISOMERS)
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N	
ISOPHORONE	78-59-1	10		Y	N	PHOSGENE	75-44-5	0.1		Y	N	
LEAD COMPOUNDS		0.01	Q	N	Y	PHOSPHINE	7803-51-2	5		N	N	
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N	
MALEIC ANHYDRIDE	108-31-6	1		Y	N	PTHALIC ANHYDRIDE	85-44-9	5		Y	N	
MANGANESE COMPOUNDS		0.8	R	N	Y	POLYCYLIC ORGANIC MATTER		0.01	V	Y	N	
MERCURY COMPOUNDS		0.01	S	N	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y	
METHANOL	67-56-1	10		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N	
METHOXYCHLOR	72-43-5	10	V	Y	Y	PROPIONALDEHYDE	123-38-6	5		Y	N	
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y	
METHYL CHLORIDE	74-87-3	10		Y	N	PROPYLENE OXIDE	75-56-9	5		Y	N	
METHYL ETHYL KETONE (Delisted)	78-93-3					PROPYLENEMINE, [1,2-]	75-55-8	0.003		Y	N	
METHYL HYDRAZINE	60-34-4	0.06		Y	N	QUINOLINE	91-22-5	0.006		Y	N	
METHYL IODIDE	74-88-4	1		Y	N	QUINONE	108-51-4	5		Y	N	
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y	
METHYL ISOCYANATE	624-83-9	0.1		Y	N	SELENIUM COMPOUNDS		0.1	W	N	Y	
METHYL METHACRYLATE	80-62-6	10		Y	N	STYRENE	100-42-5	1		Y	N	
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	STYRENE OXIDE	96-09-3	1		Y	N	
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y	
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N	
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N	
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N	
MINERAL FIBERS		0	T	N	Y	TOLUENE	108-88-3	10		Y	N	
NAPHTHALENE	91-20-3	10	V	Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N	
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N	
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	TOXAPHENE	8001-35-2	0.01		Y	N	
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	TRICHLOROENZENE, [1,2,4-]	120-82-1	10		Y	N	
NICKEL COMPOUNDS		1	U	N	Y	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N	
NICKEL REFINERY DUST		0.08	U	N	Y	TRICHLOROETHYLENE	79-00-5	1		Y	N	
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N	
NITROBENZENE	98-95-3	1		Y	N	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N	
NITROBIPHENYL, [4-]	82-93-3	1	V	Y	N	TRIETHYLAMINE	121-44-8	10		Y	N	
NITROPHENOL, [4-]	100-02-7	5		Y	N	TRIFLURALIN	1582-09-8	9		Y	Y	
NITROPROPANE, [2-]	79-46-9	1		Y	N							

Group ID	Aggregate Group Name
A	Asbestos
B	Cresols/Cresylic Acid (
C	2,4 - D, Salts and Ester
D	Dibenzofurans, Dibenz
E	4, 6 Dinitro-o-cresol, an
F	Lindane (all isomers)
G	Xylenes (all isomers an
H	Antimony Compounds
I	Arsenic Compounds
J	Beryllium Compounds
K	Cadmium Compounds
L	Chromium Compounds
M	Cobalt Compounds
N	Coke Oven Emissions
O	Cyanide Compounds
P	Glycol Ethers
Q	Lead Compounds (exco
R	Manganese Compound
S	Mercury Compounds
T	Fine Mineral Fibers
U	Nickel Compounds
V	Polycyclic Organic Mat
W	Selenium Compounds
X	Polychlorinated Biphen
Y	Radionuclides

Note 1 The SMAL for radionuclides is 0.3 millirems per year for 7 years 1 in 1 million

Attachment Plant Wide VOCs

This sheet covers the period from _____ to _____.
 (month, year) (month, year)

Table 1: Mass Balance Worksheet for Robotic Welding Booths (EP-012A through EP-012H), Spray Booths (EP-013A through EP-013D, and EP-027), Plasma Torch (EP-026), Dip Painting Operations (EP-028 and EP-031), Alkaline Washes (EP-029A and EP-034A), Phosphate Washes (EP-029B and EP-034B), Combined Welding (EP-032), Dip Tank (EP-033), and Gasoline Tank (EP-037)¹⁵

A	B	C	D	E
Material Used, (Name) ¹⁶	Amount of Material Used (Include Units) ¹⁷	Density (lbs/gal) ¹⁸	VOC Content (Weight %) ¹⁹	VOC Emissions (Tons) ²⁰
F. Total VOC Emissions from Mass Balance Materials (tons/month)²¹:				

¹⁵ For the gasoline tank, the permittee shall either record actual emissions on this attachment (or equivalent), or shall use EPA TANKS program (or equivalent) to calculate the emissions.
¹⁶ Record the name of each material used that contains a VOC as defined in 10 CSR 10-6.020.
¹⁷ Record the usage and units of the material.
¹⁸ Record the material density. If density is not provided, the permittee may calculate the density by using the specific gravity and the following equation:

$$(specific\ gravity) * \left(\frac{8.34\ lbs}{gallon}\right) = \left(density\ \frac{lb}{gallon}\right)$$

¹⁹ Record the VOC content from the SDS. If VOC content has a range, then use the highest value.
²⁰ Calculate the VOC emissions by one of the following methods:
 iv. If the usage is in tons (Column B) * (Column D) = Column E
 v. If usage is in pounds (Column B) * $\left(\frac{Column\ D}{2000}\right) = Column\ E$
 vi. If usage is in gallons (Column B) * (Column C) * $\left(\frac{Column\ D}{2000}\right) = Column\ E$
²¹ Sum of Column E.

Attachment Plant Wide VOCs (continued)

Table 2: Natural gas combustion from Curing Ovens (EP-013E, EP-030, and EP-035), Space Heaters (EP-017), Pyrolysis Furnaces (EP-019 and EP-036), Alkaline Washes (EP-029A and EP-034A), and Phosphate Washes (EP-029B and EP-034B)

G	H	I
Monthly Natural Gas Usage for all units (MMCF) ²²	VOC Emission Factor (lb/MMCF) ²³	Monthly VOC Emissions (tons) ²⁴
	5.5	
J. Total VOC Emissions from Combustion (tons/month):		

Table 3: Calculation of total monthly VOC and 12-month total VOCs

K. Sum of Column F and J for this month (tons) ²⁵ :	
L. SSM Emissions for this month (tons) ²⁶ :	
M. Column O from previous month's worksheet (tons) ²⁷ :	
N. Column K from previous year's worksheet (tons) ²⁸ :	
O. Current 12-month Total of VOC Emissions (tons)²⁹:	

²² Plant wide usage of natural gas. This value may be taken from the utility bill or main plant meter.

²³ Sourced from SCC 10200603.

²⁴ Calculate the VOC emissions using the following equation: $(\text{Column G}) * \left(\frac{\text{Column H}}{2000}\right) = \text{Column I}$

²⁵ Sum of all VOC emissions for this month.

²⁶ SSM emissions for this month, as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050

²⁷ This value is carried forward from the previous month's worksheet, and represents the 12 month total of VOC emissions as of the previous month

²⁸ This value is carried forward from the previous year's worksheet, and represents the monthly VOC emissions for the same month in the previous year.

²⁹ Current 12-month total VOC emissions. Calculated using the following equation:

$(\text{Column K}) + (\text{Column L}) + (\text{Column M}) - (\text{Column N}) = \text{Column O}$. A total of less than 250.0 tons indicates compliance.

Attachment Plant Wide Individual HAPs

This sheet covers the period from _____ to _____.
(month, year) (month, year)

HAP Name or Group: _____ **CAS No.:** _____

Table 1: Emissions of individual HAPs

A	B
List materials that contain this HAP (Name or Group) ³⁰	HAP emissions (tons) ³¹
C. Total emissions for this HAP (tons/month)^{32:}	

Table 2: Calculation of monthly individual HAPs and 12 month total individual HAPs

D. SSM Emissions for this month for this individual HAP (tons) ^{33:}	
E. Column G from previous month's worksheet (tons) ^{34:}	
F. Column C from previous year's worksheet (tons) ^{35:}	
G. Current 12-month Total of individual HAP Emissions (tons)^{36:}	

³⁰ Compare ingredient names and CAS to the Air Pollution Control Program Table of Hazardous Air Pollutants, Screening Model Action Levels, for confirmation as a HAP. For the combustion units only, the permittee may substitute the total Combined HAPs calculated in Attachment Plant Wide Combined HAPs, Column J for the individual HAPs on this worksheet. This will overestimate individual HAP emissions, but will streamline compliance calculations.

³¹ Carry forward the value from Attachment Plant Wide Combined HAPs for this specific HAP.

³² Sum all emissions of this specific HAP.

³³ SSM emissions for this month, as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.

³⁴ This value is carried forward from the previous month's worksheet, and represents the 12 month total of individual HAP emissions as of the previous month.

³⁵ This value is carried forward from the previous year's worksheet, and represents the monthly individual HAP emissions for the same month in the previous year.

³⁶ Current 12-month total individual HAP emissions. Calculated using the following equation:
(Column C) + (Column D) + (Column E) - (Column F) = Column G.

A total of less than 10 tons indicates compliance.

Attachment Plant Wide Combined HAPs

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Table 1: Mass Balance Worksheet for Robotic Welding Booths (EP-012A through EP-012H), Spray Booths (EP-013A through EP-013D, and EP-027), Plasma Torch (EP-026), Dip Painting Operations (EP-028 and EP-031), Alkaline Washes (EP-029A and EP-034A), Phosphate Washes (EP-029B and EP-034B), Combined Welding (EP-032), Dip Tank (EP-033), and Gasoline Tank (EP-037)³⁷

A	B	C	D	E
Material Used, (Name, HAP CAS #, Group) ³⁸	Amount of Material Used (Include Units) ³⁹	Density (lbs/gal) ⁴⁰	HAP Content (Weight %) ⁴¹	HAP Emissions (Tons) ⁴²
F. Total Combined HAP Emissions from Mass Balance Materials (tons/month)⁴³:				

³⁷ For the gasoline tank, the permittee shall either record actual emissions on this attachment (or equivalent), or shall use EPA TANKS program (or equivalent) to calculate the emissions.

³⁸ Compare ingredient names and CAS to the *Air Pollution Control Program Table of Hazardous Air Pollutants, Screening Model Action Levels* (SMAL Table), for confirmation as a HAP.

³⁹ Record the usage and units of the material.

⁴⁰ Record the material density. If density is not provided, the permittee may calculate the density by using the specific gravity and the following equation:

$$(specific\ gravity) * \left(\frac{8.34\ lbs}{gallon}\right) = \left(density\ \frac{lb}{gallon}\right)$$

⁴¹ Record the HAP content from the SDS. If HAP content has a range, then use the highest value.

⁴² Calculate the HAP emissions by one of the following methods:

i. If the usage is in tons (Column B) * (Column D) = Column E

ii. If usage is in pounds (Column B) * $\left(\frac{Column\ D}{2000}\right) = Column\ E$

iii. If usage is in gallons (Column B) * (Column C) * $\left(\frac{Column\ D}{2000}\right) = Column\ E$

⁴³ Sum of Column E.

Attachment Plant Wide Combined HAPs (Continued)

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Table 2: Natural gas combustion from Curing Ovens (EP-013E, EP-030, and EP-035), Space Heaters (EP-017), Pyrolysis Furnaces (EP-019 and EP-036), Alkaline Washes (EP-029A and EP-034A), and Phosphate Washes (EP-029B and EP-034B)

G	H	I
Monthly Natural Gas Usage for all units (MMCF) ⁴⁴	Total HAPs Emission Factor (lb/MMCF) ⁴⁵	Monthly HAP Emissions (tons) ⁴⁶
	1.89	
J. Total Combined HAP Emissions from Combustion (tons/month):		

Table 3: Calculation of total monthly Combined HAPs and 12-month total Combined HAPs

K. Sum of Column F and J for this month (tons) ⁴⁷ :	
L. SSM Emissions for this month (tons) ⁴⁸ :	
M. Column O from previous month's worksheet (tons) ⁴⁹ :	
N. Column K from previous year's worksheet (tons) ⁵⁰ :	
O. Current 12-month Total of Combined HAP Emissions (tons)⁵¹:	

⁴⁴ Plant wide usage of natural gas. This value may be taken from the utility bill or main plant meter.

⁴⁵ Sourced from SCC 10200603.

⁴⁶ Calculate the HAP emissions using the following equation: $(\text{Column G}) * \left(\frac{\text{Column H}}{2000}\right) = \text{Column I}$

⁴⁷ Sum of all HAP emissions for this month.

⁴⁸ SSM emissions for this month, as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.

⁴⁹ This value is carried forward from the previous month's worksheet, and represents the 12 month total of Combined HAP emissions as of the previous month.

⁵⁰ This value is carried forward from the previous year's worksheet, and represents the monthly Combined HAP emissions for the same month in the previous year.

⁵¹ Current 12-month total Combined HAP emissions. Calculated using the following equation:
 $(\text{Column K}) + (\text{Column L}) + (\text{Column M}) - (\text{Column N}) = \text{Column O}.$

A total of less than 25.0 tons indicates compliance.

Attachment Method 22

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

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

Attachment Method 9

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

Attachment Method 9 (Continued)
 Method 9 Opacity Observations

Minute	Seconds				1-minute Avg. % Opacity ⁵²	6-minute Avg. % Opacity ⁵³	Steam Plume (check if applicable)		Comments
	0	15	30	45			Attached	Detached	
	Opacity Readings (% Opacity) ⁵⁴								
0						N/A			
1						N/A			
2						N/A			
3						N/A			
4						N/A			
5									
6									
7									
8									
9									
10									
11									
12									
13									
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18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									

The emission unit is in compliance if each six-minute average opacity is less than or equal to 20 %. Exception:
 The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 40%.

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

 Signature of Observer

⁵² 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.

⁵³ 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.

⁵⁴ Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Hutchens Industries, Inc. operates an installation in Mansfield, Missouri that manufactures truck trailer suspensions. Operations at the installation include welding and surface coating of metal parts. The installation is a synthetic minor NSR source, a synthetic area HAP source, and a Title V major source of VOC. The installation is not a named source, therefore fugitive emissions are not counted towards major source applicability.

The installation is subject to 40 CFR part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources and 40 CFR part 63 Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.

The installation has dismantled the following equipment

EP #	Description	Date dismantled
EP-013C	Spray Booth #3; painting of metal parts and products; MHDR 8.75 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	2017

The previous five years of reported emissions and the installation's potential to emit are shown in the table below. Potential emissions are taken from issued construction permits and include the plant wide limitations on VOC and HAP emissions.

Table 1: Emissions Profile, tons per year

Pollutants	Reported Emissions				Potential Emissions ⁵⁵
	2013	2014	2015/2016 ⁵⁶	2017	
Particulate Matter ≤ Ten Microns (PM ₁₀)	1.45	5.10	11.85	7.77	44.43
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	1.40	5.03	11.63	7.71	44.43
Sulfur Oxides (SO _x)	0	0	0	0	0.13
Nitrogen Oxides (NO _x)	0	0	0	0	20.60
Volatile Organic Compounds (VOC)	32.61	48.68	58.64	59.64	<250
Carbon Monoxide (CO)	0	0	0	0	6.45

⁵⁵ Taken from Construction Permit 012017-011.

⁵⁶ The installation submitted the reduced reporting form for 2016. Therefore, emissions for 2015 and 2016 are the same. At the time of reporting, the installation held an Intermediate Operating Permit.

Pollutants	Reported Emissions				Potential Emissions ⁵⁵
	2013	2014	2015/2016 ⁵⁶	2017	
Hazardous Air Pollutants (HAPs)	0	0	0	0.14	<10/25

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. Part 70 Operating Permit Application, received June 13, 2018;
2. 2017 Emissions Inventory Questionnaire, received April 30, 2018;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4. webFIRE; and
5. All documents listed in Construction Permit History

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.

See MACT Section

Other Air Regulations Determined Not to Apply to the Operating Permit

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

See MACT Section

Construction Permit History

The following construction permits were issued to this installation:

1. Construction Permit #0691-015
 This Section 3 construction permit was issued June 28, 1991 to authorize the installation of 2 controlled pyrolysis cleaning furnaces, and 4 paint spray booths. The 4 paint spray booths and one of the pyrolysis furnaces were never installed. The single pyrolysis furnace installed under this construction permit is currently referenced as emission point EP-019. This permit contains 8 special conditions. Special Conditions #1 through 5 are included in this operating permit for EP-019 as Permit Condition 0691-015. The remaining special conditions are not included as they apply to the paint booths.
2. Construction Permit #0596-008
 This Section 5 construction permit was issued May 3, 1996 for the conversion of an existing solvent based primer spray paint system to water reducible paint, installation of an 0.8 MMBtu/hr burner, and installation of a 5th spray booth. These permitted changes and equipment were never installed. Therefore this permit does not appear in the operating permit.

3. Construction Permit #0996-006
This Section 5 construction permit was issued September 10, 1996 to construct an enclosed sawdust storage system, a lumber drying kiln, and a robotic welding line. These permitted changes and equipment have been removed. Therefore this permit does not appear in the operating permit.
4. Construction Permit #1197-002
This Section 6 construction permit was issued October 14, 1997 for the construction of a dry plasma metal cutting torch. This plasma torch is referenced as emission point EP-026 in this operating permit. This construction permit does not contain any special conditions. 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, and the correct MHDR is 0.96 ton/hr. These corrected values are used in this operating permit.
5. Construction Permit #0298-006
This Section 6 construction permit was issued January 20, 1998 for the construction of a spray paint booth. This construction permit does not contain any special conditions. This unit was removed from site.
6. Construction Permit #062003-007
This Section 5 construction permit was issued May 5, 2003 for the construction of a primer dip tank. (EP-028). This construction permit does not contain any special conditions.
7. Construction Permit #122003-005
This Section 6 construction permit was issued November 14, 2003 for the installation of a welding assembly area consisting of 171 welding machines. Additionally, this permit combines the emissions from the new units with the emissions from the existing welding units under one emission point, EP-032. This construction permit does not contain any special conditions.
8. Construction Permit #062007-013
This Section 6 construction permit was issued June 28, 2007 to revise Construction Permit #062003-007 to increase the length and speed of the circular conveyor and the MHDR to 2.0 gallons/hour in order to increase production at the dip paint tank installed under Construction Permit #062003-007. This construction permit contains one special condition, which requires the permittee to comply with 40 CFR part 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Parts and Products. This special condition does not appear in the operating permit, as the installation is no longer subject to Subpart Mmmm, see MACT section in this Statement of Basis.
9. Construction Permit #082009-009
This Section 5 construction permit was issued August 20, 2009 to authorize the installation of a dip coating operation consisting of the following equipment:
 - A. EP-033, Dip Paint System
 - B. EP-034A, Alkaline Wash
 - C. EP-034B, Iron Phosphate Wash
 - D. EP-035, Paint Curing System
 - E. 2-600 gallon capacity rinse tanks, 1-600 gallon capacity seal tank, 1 non heated air blow off system

This construction permit contains three special conditions. Special Condition #1 imposes a VOC limitation on emission points listed in A through D above; Special Condition #2 allows for alternative coatings; and Special Condition #3 requires submission of potential to emit calculations. Special Condition #3 is a one time requirement that has been satisfied, therefore only Special Conditions #1 and #2 appear in this operating permit as Permit Condition 082009-009.

10. Construction Permit #102011-008, and

11. Construction Permit Amendment #102011-008A

This Section 5 construction permit was initially issued October 17, 2011 for the installation of a controlled pyrolysis cleaning furnace. This unit is referenced as emission point EP-036 in this operating permit. The initial permit was entirely superseded by the amendment, which was issued November 29, 2011. The amended permit contains one special condition with multiple subparts, all of which appear in this operating permit as Permit Condition 102011-008A.

12. Construction Permit #012017-011

This Section 6 construction permit was issued January 18, 2017 for the installation of a paint booth (EP-013D) and curing oven (EP-013E). The new paint booth is equipped with a conveyor system that transports steel parts through the booth as they are simultaneously coated by two paint guns. The paint booth has an overall maximum paint application rate of 4.95 gallons/hour. A fabric mat filter is used to control particulate matter emissions. After painting, the parts are transported to a curing oven, which is rated at 2.0 MMBtu/hr and combusts natural gas. This construction permit contains five special conditions. Special Conditions #1 and #2 establish the plant wide emission limitations of 250 tons/12 month period of VOC and 10/25 tons/12 month period of individual and total HAPs that appear as plant wide conditions in this operating permit as Permit Condition 012017-011 Plant Wide. Special Conditions 2, 3, and 4 apply specifically to the paint booth (EP-13D) and appear in this operating permit as Permit Condition 012017-011. Special Condition #5 contains reporting and recordkeeping requirements that are duplicative of those contained in the operating permit, therefore they have not been included as a permit streamlining measure.

New Source Performance Standards (NSPS) Applicability

40 CFR part 60 Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978

40 CFR part 60 Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

40 CFR part 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

These regulations apply to storage vessels with the following parameters:

Rule	Constructed/modified/reconstructed	With contents and capacities.....
K	Between June 11, 1973 and May 19, 1978	Petroleum liquids, >40,000 gallons
Ka	Between May 18, 1978 and July 23, 1984	Petroleum liquids, >40,000 gallons
Kb	After July 23, 1984	Volatile organic liquids, >19,813 gallons

The tanks at this installation do not meet the applicability in the table above, therefore this regulation does not apply.

40 CFR Part 60 Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations

This regulation applies to prime coat operations, guide coat operations, and topcoat operations located at automobile or light-duty truck assembly plants. This installation manufactures truck trailer suspensions, and is not an automobile or light-duty truck assembly plant. Therefore, this regulation does not apply.

40 CFR Part 60 Subpart IIII, Stationary Compression Ignition Internal Combustion Engines

40 CFR Part 60 Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines

These regulations apply to various internal combustion engines. The installation does not have any internal combustion engines on site, therefore these regulations do not apply.

Maximum Achievable Control Technology (MACT) Applicability

Once In, Always In

On January 25, 2018, the US EPA published a memorandum titled "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act". This guidance memorandum addresses the question of when a major source subject to a MACT standard may be reclassified as an area source. This memorandum supersedes the previous guidance, titled "Potential to Emit for MACT Standards-Guidance on Timing Issues", which established the policy of Once In, Always In. The 2018 memo clarifies that when an installation obtains an enforceable limit on HAP emissions to become an area source, regardless of when the limit is taken, the source is not subject to major source regulations under CAA 112, so long as the source's potential emissions remains below the major source thresholds for HAP emissions.

This memo directly affects the applicability of the following regulations for this installation:

1. 40 CFR Part 63 Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
 - a. Although the installation has accepted a federally enforceable limitation on HAP emissions, it was not established prior to the compliance date of this regulation, therefore the regulation applied under the Once In, Always In policy. As of January 25, 2018, this regulation no longer applies as the installation is classified as an area source of HAP emissions. Accordingly, this regulation is not contained in this operating permit.
2. Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
 - a. With the existing federally enforceable limitation on HAP emissions to less than the major source thresholds, and the rescission of the Once In, Always In policy, the installation is now classified as an area source of HAP emissions. Therefore, the installation meets the applicability of this regulation and it is included as a permit condition in this operating permit. The specific applicability of this regulation is detailed below.

40 CFR part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane

(CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.

40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

This regulation applies to various internal combustion engines. The installation does not have any internal combustion engines on site, therefore this regulation does not apply.

40 CFR part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters

The provisions of this subpart apply to various industrial, commercial, or institutional boiler or process heaters located at major sources of HAPs. This installation is an area source of HAPs, therefore this regulation does not apply.

40 CFR part 63 Subpart CCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

This regulation applies to gasoline dispensing facilities located at area sources of HAPs. This installation has monthly throughput less than 10,000 gallons, therefore only those application portions of the regulation have been included in the operating permit.

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

This regulation applies to paint stripping and surface coating operations located at area sources of HAPs. This installation meets the applicability of §63.11170(a)(2), as they perform spray applications of coatings as defined in the subpart. For installations that perform the operations, but can demonstrate to the Administrator's satisfaction that the coatings do not contain the target HAPs, an exemption from the regulation may be granted. To obtain this exemption, the installation must submit a petition to the Administrator and the Administrator must approve the petition. Until the exemption is granted, the installation is subject to the regulation. The installation submitted the initial notification and exemption petition in November 2018. The permit conditions contains the remaining provisions of the regulation that apply until the exemption is granted by the Administrator. Upon receipt of the exemption, this regulation shall no longer apply.

For this regulation, new sources are defined as being constructed after September 17, 2007. Spray Booth #5 (EP-013D) is a new source, the other Spray Booths (EP-013A, B, C, and EP-027) are existing sources.

40 CFR part 63 Subpart XXXXXX, National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

This regulation applies to various metal fabrication and finishing operations located at area sources of HAP emissions. The applicability of this regulation is based on SIC and NAICS codes. The codes for

the operations at this installation are 3715 and 336212, respectively. These codes do not match those identified in the applicability and guidance documents, therefore this regulation does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, National Emission Standard for Asbestos

This regulation applies to the installation and appears in the Core Permit Requirements section of the Operating Permit.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

40 CFR Part 64 is not applicable because the emission units that may otherwise meet the applicability use a control devices for which the operating permit specifies a continuous compliance method, therefore the installation meets exemption §64.2(b)(1)(vi).

Greenhouse Gas Emissions

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

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

This regulation applies to sources of visible emissions, with various exemptions. The applicability of this regulation is detailed in the following table:

Table 2: Applicability of 10 CSR 10-6.220

EP #	Description	Regulatory Applicability
EP-012A	Robotic Welding Booth #1; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220
EP-012B	Robotic Welding Booth #2; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220
EP-012C	Robotic Welding Booth #3; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220
EP-012D	Robotic Welding Booth #4; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220
EP-012E	Robotic Welding Booth #5; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220
EP-012F	Robotic Welding Booth #6; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220
EP-012G	Robotic Welding Booth #7; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220
EP-012H	Robotic Welding Booth #8; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Regulation applies, see Permit Condition 6.220

EP #	Description	Regulatory Applicability
EP-013A	Spray Booth #1; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	Regulation applies, see Permit Condition 6.220
EP-013B	Spray Booth #2; painting of metal parts and products; MHDR 8.75 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	Regulation applies, see Permit Condition 6.220
EP-013D	Spray Booth #5; painting of metal parts and products; with conveyor system and two paint guns; MHDR 4.95 gal/hr; controlled by fabric mat filter with 98.67% capture efficiency and 80% control efficiency, constructed 1/31/2017	Regulation applies, see Permit Condition 6.220
EP-013E	Curing Oven #3; MHDR 2.0 MMBtu/hr; pipeline grade natural gas; constructed 1/31/2017.	Combusts natural gas, exempt per (1)(L)
EP-017	Space Heaters, Natural Gas, total MHDR 22.75 MMBtu/hr	Combusts natural gas, exempt per (1)(L)
EP-019	Pyrolysis Furnace #1; Controlled pyrolysis cleaning furnace which cleans nonhazardous paint from paint line hooks; fired with pipeline grade natural gas; MHDR 0.3 MMBtu; constructed 1993	Combusts natural gas, exempt per (1)(L)
EP-026	Plasma Torch; dry plasma metal cutting torch used to cut 0.375 inch thick sheets of cold rolled steel; MHDR 0.96 ton steel/hr; constructed 1997	Regulation applies, see Permit Condition 6.220
EP-027	Spray Booth #4; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	Regulation applies, see Permit Condition 6.220
EP-028	Dip Paint Operation #1; MHDR 34.3 gal/hr; constructed 2001	Not expected to emit visible emissions, rule does not apply
EP-029A	Alkaline Wash; Alkaline wash is a 12,000 gallon heated tank with 3.5 MMBtu/hr burner and 600 gallon non heated rinse tank; Constructed 2000	Combusts natural gas, exempt per (1)(L)
EP-029B	Phosphate Wash; Iron phosphate wash – 600 gallon heated tank with 0.9 MMBtu/hr burner and 6000 gallon non heated rinse tank; Constructed 2000	Combusts natural gas, exempt per (1)(L)
EP-030	Curing Oven #1; MHDR 2.6 MMBtu/hr; pipeline grade natural gas; constructed 2000	Combusts natural gas, exempt per (1)(L)
EP-031	Dip Paint Operation #2; MHDR 34.3 gal/hr; constructed 2001	Not expected to emit visible emissions, rule does not apply
EP-032	Combined Welding, MHDR 2.41 1000 lbs electrode/hr, E70S electrode; constructed 2003	Regulation applies, see Permit Condition 6.220

EP #	Description	Regulatory Applicability
EP-033	Dip Tank; 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	Not expected to emit visible emissions, rule does not apply
EP-034A	Alkaline Wash #2; 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	Combusts natural gas, exempt per (1)(L)
EP-034B	Phosphate Wash #2; Iron phosphate wash – 600 gallon heated tank with 0.706 MMBtu/hr burner and 6000 gallon non heated rinse tank; Constructed 8/20/2009	Combusts natural gas, exempt per (1)(L)
EP-035	Curing Oven #2; 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; Constructed 8/20/2009	Combusts natural gas, exempt per (1)(L)
EP-036	Pyrolysis Furnace #2; Controlled pyrolysis cleaning furnace which cleans nonhazardous paint from paint line hooks; fired with pipeline grade natural gas MHDR 0.3 MMBtu/hr; Constructed July 21, 2011. Controlled by Direct Flame Afterburner.	Combusts natural gas, exempt per (1)(L)

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

This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri’s State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP, therefore it must appear in this Operating Permit. This regulation does not apply to the installation. All sulfur emissions result from the combustion of natural gas, which meets exemption (1)(A)2.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions

This regulation applies to all sources of sulfur dioxide. This regulation does not apply to the installation. All sulfur emissions result from the combustion of natural gas, which meets exemption (1)(A).

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

This regulation applies to sources of particulate matter, with various exemptions. The applicability of this regulation is detailed below:

Table 3: Applicability of 10 CSR 10-6.400

EP #	Description	Regulatory Applicability
EP-012A	Robotic Welding Booth #1; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below
EP-012B	Robotic Welding Booth #2; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below

EP #	Description	Regulatory Applicability
EP-012C	Robotic Welding Booth #3; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below
EP-012D	Robotic Welding Booth #4; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below
EP-012E	Robotic Welding Booth #5; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below
EP-012F	Robotic Welding Booth #6; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below
EP-012G	Robotic Welding Booth #7; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below
EP-012H	Robotic Welding Booth #8; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	Applies, see Permit Condition 6.400 and table below
EP-013A	Spray Booth #1; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	Applies, see Permit Condition 6.400 and table below
EP-013B	Spray Booth #2; painting of metal parts and products; MHDR 8.75 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	Applies, see Permit Condition 6.400 and table below
EP-013D	Spray Booth #5; painting of metal parts and products; with conveyor system and two paint guns; MHDR 4.95 gal/hr; controlled by fabric mat filter with 98.67% capture efficiency and 80% control efficiency, constructed 1/31/2017	Applies, see Permit Condition 6.400 and table below
EP-013E	Curing Oven #3; MHDR 2.0 MMBtu/hr; pipeline grade natural gas; constructed 1/31/2017.	Gaseous fuels do not meet definition of process weight, not subject to rule.
EP-017	Space Heaters, Natural Gas, total MHDR 22.75 MMBtu/hr	Gaseous fuels do not meet definition of process weight, not subject to rule.
EP-019	Pyrolysis Furnace #1; Controlled pyrolysis cleaning furnace which cleans nonhazardous paint from paint line hooks; fired with pipeline grade natural gas; MHDR 0.3 MMBtu; constructed 1993	Gaseous fuels do not meet definition of process weight, not subject to rule.

EP #	Description	Regulatory Applicability
EP-026	Plasma Torch; dry plasma metal cutting torch used to cut 0.375 inch thick sheets of cold rolled steel; MHDR 0.96 ton steel/hr; constructed 1997	Uncontrolled PTE<Limit, exempt per (1)(B)16. ⁵⁷
EP-027	Spray Booth #4; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	Applies, see Permit Condition 6.400 and table below
EP-028	Dip Paint Operation #1; MHDR 34.3 gal/hr; constructed 2001	Not expected to emit particulate matter, not subject to rule.
EP-029A	Alkaline Wash; Alkaline wash is a 12,000 gallon heated tank with 3.5 MMBtu/hr burner and 600 gallon non heated rinse tank; Constructed 2000	Gaseous fuels do not meet definition of process weight, not subject to rule.
EP-029B	Phosphate Wash; Iron phosphate wash – 600 gallon heated tank with 0.9 MMBtu/hr burner and 6000 gallon non heated rinse tank; Constructed 2000	Gaseous fuels do not meet definition of process weight, not subject to rule.
EP-030	Curing Oven #1; MHDR 2.6 MMBtu/hr; pipeline grade natural gas; constructed 2000	Gaseous fuels do not meet definition of process weight, not subject to rule.
EP-031	Dip Paint Operation #2; MHDR 34.3 gal/hr; constructed 2001	Not expected to emit particulate matter, not subject to rule.
EP-032	Combined Welding, MHDR 2.41 1000 lbs electrode/hr, E70S electrode; constructed 2003	Each machine has uncontrolled PTE<0.5 lb/hr, exempt per (1)(B)12. ⁵⁸
EP-033	Dip Tank; 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	Not expected to emit particulate matter, not subject to rule.
EP-034A	Alkaline Wash #2; 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	Gaseous fuels do not meet definition of process weight, not subject to rule.
EP-034B	Phosphate Wash #2; Iron phosphate wash – 600 gallon heated tank with 0.706 MMBtu/hr burner and 6000 gallon non heated rinse tank; Constructed 8/20/2009	Gaseous fuels do not meet definition of process weight, not subject to rule.
EP-035	Curing Oven #2; Paint curing system – 14 natural gas burners at 0.05 MMBtu/hr each and one overhead	Gaseous fuels do not meet definition of process weight, not subject to rule.

$$^{57} PTE_{uncontrolled} = 0.96 \frac{ton}{hr} * 1.99 \frac{lb PM}{ton} = 1.91 \frac{lb PM}{hr}; Limit = 4.10(2.5)^{0.67} = 7.58 \frac{lb PM}{hr}.$$

Emission factor supplied by installation in previous operating permit and is based on mass balance.

⁵⁸ To exceed 0.5 lb PM/hr, a single machine would require a maximum hourly design rate of 96.15 lb/hr. Most machines average 6.75 lbs/hr, with no machine exceeding 96.15 lb/hr. Based on emission factor of 5.2 lb/1000 lb from webFIRE SCC 30905254, assumes PM=PM₁₀ per AP42, Section 12.19.

EP #	Description	Regulatory Applicability
	conveyor with a line speed of 10-15 feet/minute; Constructed 8/20/2009	
EP-036	Pyrolysis Furnace #2; Controlled pyrolysis cleaning furnace which cleans nonhazardous paint from paint line hooks; fired with pipeline grade natural gas MHDR 0.3 MMBtu/hr; Constructed July 21, 2011. Controlled by Direct Flame Afterburner.	Gaseous fuels do not meet definition of process weight, not subject to rule.

Table 4: Calculations and Compliance Demonstrations for Units Subject to 10 CSR 10-6.400

EP #	Description	Calculations			Potentials	
		Actuals	Standard (ft ³ /min) ⁵⁹	Limit	Lb/hr	gr/dscf ⁶⁰
EP-012A	Robotic Welding Booth #1; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65 ⁶¹	0.051
EP-012B	Robotic Welding Booth #2; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65	0.051
EP-012C	Robotic Welding Booth #3; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65	0.051
EP-012D	Robotic Welding Booth #4; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65	0.051
EP-012E	Robotic Welding Booth #5; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65	0.051
EP-012F	Robotic Welding Booth #6; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65	0.051

⁵⁹ Actual conditions converted to standard conditions using equation: $SCFM = ACFM \left(\frac{T_{STP}}{T_A} \right) \left(\frac{P_A}{P_{STP}} \right)$, with $P_A = P_{STP}$, $T_{STP} = 68^\circ F$

⁶⁰ Calculated from potential lb/hr using the following equation: $\frac{lb PM}{hr} * \frac{7,000 gr}{lb} * \frac{min}{scf} * \frac{1 hr}{60 min} = \frac{gr}{scf}$

⁶¹ All welding potential emissions based on emission factor of 5.2 lb/1000 lb from webFIRE SCC 30905254, assumes PM=PM₁₀ per AP42, Section 12.19.

EP #	Description	Calculations			Potentials	
		Actuals	Standard (ft ³ /min) ⁶²	Limit	Lb/hr	gr/dscf ⁶³
EP-012G	Robotic Welding Booth #7; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65	0.051
EP-012H	Robotic Welding Booth #8; E70S electrode; 4 robotic welding arms/booth; MHDR 0.125 1000 lb electrode/booth	T=77°F Q=1,500 ft ³ /min	1,475	0.100 gr/scf	0.65	0.051
EP-013A	Spray Booth #1; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	T=77°F Q=30,000 ft ³ /min	29,497	0.061 gr/scf	2.40 ⁶⁴ Controlled	0.009 Controlled
EP-013B	Spray Booth #2; painting of metal parts and products; MHDR 8.75 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	T=77°F Q=20,000 ft ³ /min	19,665	0.070	3.13 ⁶⁵ Controlled	0.020 Controlled
EP-013D	Spray Booth #5; painting of metal parts and products; with conveyor system and two paint guns; MHDR 4.95 gal/hr; controlled by fabric mat filter with 98.67% capture efficiency and 80% control efficiency, constructed 1/31/2017.	T=77°F Q=16,000 ft ³ /min	15,732	0.056 gr/scf	5.19 ⁶⁶ Controlled	0.038 Controlled

⁶² Actual conditions converted to standard conditions using equation: $SCFM = ACFM \left(\frac{T_{STP}}{T_A} \right) \left(\frac{P_A}{P_{STP}} \right)$,

with $P_A = P_{STP}$, $T_{STP} = 68^\circ\text{F}$

⁶³ Calculated from potential lb/hr using the following equation: $\frac{\text{lb PM}}{\text{hr}} * \frac{7,000 \text{ gr}}{\text{lb}} * \frac{\text{min}}{\text{scf}} * \frac{1 \text{ hr}}{60 \text{ min}} = \frac{\text{gr}}{\text{scf}}$

⁶⁴ MHDR=17.5 gal/hr, worst case coating density=11.44 lb/gal, 17% solids, with 65% transfer efficiency, overall control efficiency=78.9%

⁶⁵ MHDR=8.75 gal/hr, worst case coating density=8.18 lb/gal, 62% solids, with 65% transfer efficiency, overall control efficiency=79.8%

⁶⁶ MHDR=4.95 gal/hr, worst case coating density=11.12 lb/gal, 81.45% solids, with 45% transfer efficiency, overall control efficiency=78.9%

EP #	Description	Calculations			Potentials	
		Actuals	Standard (ft ³ /min) ⁶⁷	Limit	Lb/hr	gr/dscf ⁶⁸
EP-027	Spray Booth #4; painting of metal parts and products; MHDR 17.5 gal/hr; controlled by nonwoven synthetic filter with 99.76% capture efficiency and 80% control efficiency; constructed pre-1996	T=77°F Q=10,99 5 ft ³ /min	10,811	0.096	1.31 ⁶⁹ Controlled	0.014 Controlled

10 CSR 10-6.405, Restriction of Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

This regulation applies to indirect heating sources of particulate matter, with various exemptions. All combustion uses of natural gas, therefore the installation meets exemption (1)(E) and this regulation does not 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).

⁶⁷ Actual conditions converted to standard conditions using equation: $SCFM = ACFM \left(\frac{T_{STP}}{T_A} \right) \left(\frac{P_A}{P_{STP}} \right)$,

with $P_A = P_{STP}$, $T_{STP} = 68^\circ F$

⁶⁸ Calculated from potential lb/hr using the following equation: $\frac{lb PM}{hr} * \frac{7,000 gr}{lb} * \frac{min}{scf} * \frac{1 hr}{60 min} = \frac{gr}{scf}$

⁶⁹ MHDR=2.45 gal/hr, worst case coating density=11.488 lb/gal, 65.96% solids, with 65% transfer efficiency, overall control efficiency=79.8%

Response to Public Comments

The draft Part 70 Operating Permit for Hutchens Industries, Inc. was placed on public notice January 11, 2019 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <https://dnr.mo.gov/env/apcp/permit-public-notices.htm>. No public comments were received.