

Missouri Department of

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**NATURAL RESOURCES**

Eric R. Greitens, Governor

Carol S. Comer, Director

**APR 24 2018**

Mr Barry DeRousse  
Vice President of Operations  
Manac Trailers USA, Inc.  
8593 State Highway 77  
Oran, MO 63771

Re: Amendment to Intermediate State Operating Permit OP2016-024  
Installation ID Number: 201-0102

Dear Mr. DeRousse:

The Department of Natural Resources, Air Pollution Control Program, has completed its review of your permit amendment notification (application) to the Intermediate Operating Permit OP2016-024. This amendment notification (application) is complete and is *accepted* as an amendment to your Air Operating Permit. Please note that you are required to operate your installation under the terms as submitted and outlined in your notification (application).

The amendment consists of additional equipment and limitations resulting from issuance of Construction Permit 102017-008:

- The additional equipment is added to the "Emission Units with Limitations" section, replacing the list on page 3.
- Permit Condition PW 2 is updated with a new Hazardous Air Pollutant emission limit for individual HAPs and some new operational limitations.
- Permit Condition 2 is updated with the new equipment, EP-08 through -15. No other changes were made to PC 2.
- A new Permit Condition 4 is added with operational limitations for two new spray paint booths, EP-08 and -09.

Please place this letter and attached pages with OP2016-024. The expiration date of the operating permit does not change. The updated permit OP2016-024A expires on August 21, 2021.



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Mr Barry DeRousse  
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If you have any questions regarding this matter, please contact the Air Pollution Control Program Operating Permits Unit at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

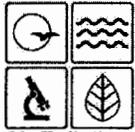
*Kendall B. Hale*

Kendall Hale  
Permit Section Chief

KLM:bjj

Enclosure

c: Southeast Regional Office w/ copy of amendment  
PAMS File: AP2018-02-034



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

# INTERMEDIATE STATE PERMIT TO OPERATE

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

**Intermediate Operating Permit Number:** OP2016-024A  
**Expiration Date:**  
**Installation ID:** 201-0102  
**Project Number:** 2018-02-034

## EMISSION UNITS WITH LIMITATIONS

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

Emission Point #	Description
EP-01	Gas Metal Arc Welding – MHDR 256 lbs/hr
EP-02	Abrasive Blasting – MHDR 50 lbs/hr
EP-03	Paint Spraying – MHDR primer 1.5 gal/hr paint 3.6 gal/hr
EP-05	Space Heaters – MHDR 10.511 mmBTU/hr natural gas; 0.125 mmBTU/hr propane
EP-07	Plasma cutter – MHDR 3.44 lbs/hr
EP-08	Paint Spray Booth 2 0.06 gal/min
EP-09	Paint Spray Booth 3 0.06 gal/min
EP-10	Gas Metal Arc Welding Area 2 256 lbs/hr
EP-11	Wheelabrator (Abrasive Blastina) 4.8 tons/ hr
EP-12	Plasma Table
EP-13	Air Make-up Unit 1 (Natural Gas) 3.456 MMBtu/hr
EP-14	Air Make-up Unit 2 (Natural Gas) 3.456 MMBtu/hr
EP-15	Haul Roads 1,100 ft. (unpaved)

**PERMIT CONDITION PW 2**  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit 102017-008, Issued October 18, 2017

**Emissions Limitations:**

- 1) The permittee shall emit less than SMAL (see Appendix A of CP 102017-008) for each individual HAP and less than 25.0 tons of combined HAPs in any consecutive 12- month period from the entire installation. [Special Condition 2A]
- 2) If a range of HAPs content is given in the safety data sheets, the higher value shall be used. [Special Condition 2B]

**Operational Limitations:**

- 1) The permittee shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. It shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment. [Special Condition 3A]
- 2) The permittee may use alternative coatings. All new coatings must be evaluated for HAP and VOCs using Attachment C of CP 102017-008. It shall maintain on site a copy of the completed Attachment C for each alternative coating used. It shall also maintain on site a copy of the manufacturer's documentation used (such as an SDS or Regulatory Report) to fill in the Attachment C.
- 3) The limits applied to the installation in Emissions Limitations: will include emissions from the use of any new coatings.

**Monitoring/Recordkeeping:**

- 1) The permittee shall calculate and record emissions of HAPs. Attachments F and G, or their equivalents, may be used to demonstrate compliance with the HAP limitations. [Special Condition 3B]
- 2) The permittee shall maintain all records required by this permit for not less than five years and shall make such records available to any Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets for all materials used. [Special Condition 4A]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the installation exceeded the emission limitation listed above. [Special Condition 4B]
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

## PERMIT CONDITION 2

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

Sources Installed After February 24, 1971

Emission Unit	Description
EP-01	Gas Metal Arc Welding - MHDR 256 lbs/hr
EP-02	Abrasive Blasting - MHDR 50 lbs/hr
EP-03	Paint Spraying - MHDR primer 1.5 gal/hr paint 3.6 gal/hr
EP-05	Space Heaters
EP-07	Plasma cutter
EP-08	Paint Spray Booth 2 0.06 gal/min
EP-09	Paint Spray Booth 3 0.06 gal/min
EP-10	Gas Metal Arc Welding Area 2 256 lbs/hr
EP-11	Wheelabrator (Abrasive Blastina) 4.8 tons/ hr
EP-12	Plasma Table
EP-13	Air Make-up Unit 1 (Natural Gas) 3.456 MMBtu/hr
EP-14	Air Make-up Unit 2 (Natural Gas) 3.456 MMBtu/hr
EP-15	Haul Roads 1,100 ft. (unpaved)

### **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%.
- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

### **Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If no visible emissions are observed using Method 22, then no further observations are required. For emission units with visible emissions, the permittee shall have a certified observer conduct a Method 9 opacity observation.
- 2) The permittee must maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
- 4) The renewal of an operating permit does not require the installation to revert to weekly monitoring; instead, it should continue with the monitoring regime it is under at the time of issuance of the renewal permit.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachments B and C (or equivalents), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 4) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after conducting a failed Method 9 test.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

## PERMIT CONDITION 4

10 CSR 10-6.060 Construction Permits Required  
Construction Permit 102017-008, Issued October 18, 2017

Emission Unit	Description
EU-08	Paint Spray Booth 2 0.06 gal/min
EU-09	Paint Spray Booth 3 0.06 gal/min

### **Operational Limitations:**

- 1) The permittee shall control particulate matter emissions from paint guns (EP-08 and -09) using particulate filters. The filter(s) shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 4A] Replacement particulate filters for the paint booths shall be kept on hand at all times. The particulate filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). The replacement filter material type and weight shall meet or exceed the specifications of the existing filter. The air to cloth ratio or air to filter ratio shall not be increased when filter replacement is performed. [Special Condition 4B]
- 2) The permittee shall maintain a copy of the filters manufacturer's performance warranty on site.
- 3) The permittee shall monitor and record the operating pressure drop across the paint booth filter at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
- 4) The permittee shall maintain an operating and maintenance log for the paint booth filter which shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 5) The permittee shall capture all emissions from the spray booths (EU-08 and -09) with a totally enclosed booth and exhaust fan(s). Emissions from the booths shall be routed through the filter as stated in 1).
- 6) The permittee shall operate the booth's exhaust fan(s) at all times surface coating is spray applied.
- 7) The permittee shall only operate one spray gun per booth at a time.

### **Monitoring/Recordkeeping:**

- 1) The permittee shall calculate and record emissions of HAPs. Attachments F and G, or their equivalents, may be used to demonstrate compliance with the HAP limitations. [Special Condition 3B]
- 2) The permittee shall maintain all records required by this permit for not less than five years and shall make such records available to any Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets for all materials used. [Special Condition 4A]

### **Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the installation exceeded the emission limitation listed above. [Special Condition 4B]
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.