



# 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:** OP2016-006  
**Expiration Date:** MAR 29 2021  
**Installation ID:** 101-0054  
**Project Number:** 2013-03-052

**Installation Name and Address**

Master Marble, Inc.  
1292 SW 125th Road  
Holden, MO 64040-8442  
Johnson County

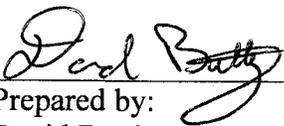
**Parent Company's Name and Address**

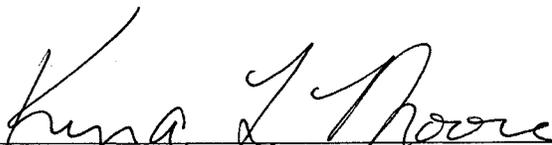
Master Marble, Inc.  
P.O. Box 185  
Holden, MO 64040

**Installation Description:**

The installation produces marble countertops, travina countertops and bath tubs.

The installation is subject to 40 CFR Part 63 Subpart WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production and has accepted a voluntary condition on VOC and HAP emissions to obtain this Intermediate Operating Permit.

  
Prepared by:  
David Buttig  
Operating Permit Unit

  
Director of Designee  
Department of Natural Resources

MAR 29 2016

Effective Date

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

The installation produces marble countertops, travina countertops and bath tubs. The countertops are produced in the Marble Countertop area, and the bath tubs are produced in the Fiberglass area.

#### Marble Countertop Production Area:

The marble countertop production process begins with the preparation of molds by spraying the mold with a wax. A mechanical (atomized) spray booth is used to apply a thin coating of gelcoat onto the mold and allowed to cure (EP-01). The gelcoat spray system consists of separate sources of catalyst and resin, with an airless hand spray gun that mixes them together into an atomized resin/catalyst stream. The resin is made in the mixing vessel (EP-04) using marble resin, pigment, catalyst, limestone, and vein pigment. The resin mix is manually poured on top of the dried gelcoat and allowed to cure. The finished product is then pulled out of the mold and the rough edges are sanded or grinded and then buffed. A portion of the sanded material is recycled back to the mixer (EP-04).

The travina countertop production process begins with the preparation of molds by spraying the mold with a wax. The resin is made in the mixing vessel (EP-04) using marble resin, pigment, catalyst, and oyster shell dust. The resin mix is manually poured into the mold and allowed to cure. The finished product is then pulled out of the mold and the rough edges are sanded or grinded and then buffed. A portion of the sanded material is recycled back to the mixer (EP-04).

#### Fiberglass Production Area

The bath tub production process begins with the preparation of molds by spraying the mold with a wax. A thin coating of gelcoat is then sprayed onto the mold and allowed to cure. The marble resin is made in the mixing vessel (EP-06), and is manually poured on top of the dried gelcoat and allowed to cure. Then a resin is mechanically applied with fiberglass as a chop on top of the poured resin. (EP-03) For these reinforced layers, a device is attached to the sprayer system to chop glass fiber into predetermined lengths and project it to merge with the resin mix stream. The stream precoats the chop, and both are deposited simultaneously on the molded marble resin. The finished product is then pulled out of the mold and the rough edges are sanded or grinded and then buffed. A portion of the sanded material is recycled back to the mixer (EP-04)

The various product molds are also produced in this area. The shape is created with a plug. The plug is the exact size and shape of the finished product. The plug is sprayed with a wax. Orange tooling gelcoat is used to give the mold a resistant surface. The tooling is sprayed onto the plug and allowed to cure. Fiberglass resin is then applied over the tooling in a mechanical chop application. The resin is mixed with methyl ethyl ketone peroxide (MEKP), which acts as an activator and hardening agent. When the new mold has completely cured, the plug is removed, the mold is sanded and grinded to meet design specifications and placed into the production process.

Orange tooling is also used to repair molds. The mold is cleaned with acetone and lightly sanded. Spot repairs involve spraying the part with tooling, allowing the tooling to cure, and then sanding. This process is repeated until the damaged is filled. All mold production and repair occurs in spray booth EP-03.

Other operations at the installation include receiving and sifting of travina stone (EP-13), propane heating (EP-05), and equipment cleaning (EP-08).

The installation is subject to 40 CFR Part 63 Subpart WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production and has accepted a voluntary condition on VOC and HAP emissions to obtain this Intermediate Operating Permit.

<b>Reported Air Pollutant Emissions, tons per year</b>					
Pollutants	2013	2012	2011	2010	2009
Volatile Organic Compounds(VOC)	2.41	2.4077	2.4077	2.1443	1.6455
Hazardous Air Pollutants (HAPs)	--	0.807	0.807	0.724	1.284

**EMISSION UNITS WITH LIMITATIONS**

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-01	Gelcoat Spray Booth #1
EP-02	Resin Spray Booth #3
EP-03	Tooling Gelcoat for molds/ Fiberglass Resin Spray Booth #2 and sifting of travina stone

**EMISSION UNITS WITHOUT LIMITATIONS**

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

<u>Description of Emission Source</u>
Mixing/Casting Vessel #1 (EP-04)
Propane Heaters (EP-05)
Mixing/Casting Vessel #2 (EP-04)
Belt Sander (EP-07)
2 Sawing tables (EP-07)
Grinding Booth (EP-07)
Sander (EP-07)
Hand Sander (Hand held 7" sander) (EP-07)
Solvent Cleaning and Solvent tank (EP-08)
Transfer of marble resin from totes to day tank and temporary storage in open vessel (totally enclosed) (EP-08)
Manual pouring of marble composite resin from mixing/casting vessel into molds (EP-09)
Manual pouring of travina resin for travina countertops (EP-08)
Crushing and Grinding of Glass in Northeast Building (EP-10)

## II. Plant Wide Emission Limitations

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

### **PERMIT CONDITION PW001**

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)  
40 CFR Part 63 Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants:*  
*Reinforced Plastic Composites Production*

#### **Emission Limitation:**

- 1) The permittee shall emit less than 100 tons of VOC in any consecutive 12-month period.
- 2) The permittee shall emit less than 10 tons of any individual hazardous air pollutant (HAP), and less than 25 tons of any combination of HAPs in any consecutive 12-month period.

#### **Monitoring/Recordkeeping:**

- 1) The permittee shall calculate and record the installation-wide emissions of VOC and HAPs. The emission factors used in these calculations shall be derived according to the procedures of 40 CFR Part 63 Subpart WWWW, Table 1 (Included in Attachment F). Documentation verifying the calculation of all emission factors shall be kept on site. [§63.5796]
- 2) The permittee may speciate Styrene emissions, and combine all other HAPs to track monthly emissions. If the combination of Styrene and all other HAPs exceeds 10 tons per year, then the permittee shall speciate all HAPs in the recordkeeping logs to maintain compliance with the emission limit.
- 3) Attachments B, C and D contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 5) All records shall be maintained for five years

#### **Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.

**PERMIT CONDITION PW002**

10 CSR 10-6.075 Maximum achievable Control Technology Regulations and  
40 CFR Part 63, Subpart A General Provisions and Subpart WWWW National Emission Standards  
for Hazardous Air Pollutants: Reinforced Plastic Composites Production

*For ease of reference, Tables 3, 4 and 7 of 40 CFR 63 Subpart WWWW (MACT WWWW) are summarized and included in Attachment F of this permit.*

**Applicability:**

- 1) The affected source consists of all parts of the facility engaged in the following operations: Open molding, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations. [§63.5790(b)]
- 2) The following operations are specifically excluded from any requirements of MACT WWWW: application of mold sealing and release agents; mold stripping and cleaning; repair of parts not manufactured at the installation, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations; prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in Section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply. [§63.5790(c)]

**Emissions and Work Practice Standards:**

- 1) The permittee shall meet the following requirements (The permittee may elect to comply using any options to meet the standards described in §63.5810): [§63.5805]
  - a) The permittee shall meet the organic HAP emissions limits in Table 3 to MACT WWWW and the work practice standards in Table 4 to MACT WWWW that apply, regardless of the quantity of HAP emitted (*See Attachment F*). [§63.5805(b)]
  - b) If the permittee performs repair operations subject to MACT WWWW as defined in §63.5935, these repair operations must meet the requirements in Tables 3 and 4 to MACT WWWW. [§63.5805(g)]

**Open Molding Organic HAP Emission Factors:**

Emissions factors are used to determine compliance with certain organic HAP emissions limits in Table 3 to MACT WWWW. The permittee may use the equations in Table 1 of MACT WWWW to calculate their emissions factors (*see Attachment F*). Equations are available for each open molding operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for the permittee to demonstrate compliance without the need to conduct a HAP emissions test. In lieu of these equations, the permittee may elect to use site-specific organic HAP emissions factors to demonstrate compliance provided the site-specific organic HAP emissions factors are approved by the Director and incorporated into this operating permit and are based on actual facility HAP emissions test data. The permittee may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate their organic HAP emissions. [§63.5796]

**Organic HAP Content:**

In order to determine the organic HAP content of resins and gel coats, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs §63.5797(a) through (c), as applicable. [§63.5797]

**General Requirements:**

- 1) The permittee shall be in compliance at all times with the work practice standards in Table 4, as well as the organic HAP emissions limits in Table 3 or the organic HAP content limits in Table 7, as applicable, that the permittee is meeting without the use of add-on controls. (See Attachment F) [§63.5835(a)]
- 2) The permittee shall always operate and maintain affected sources, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i). [§63.5835(c)]

**Open Molding Compliance:**

- 1) The permittee shall demonstrate each month that the weighted average of the organic HAP emissions limits in Table 3 of MACT WWWW is met. The permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all the open molding operations. [§63.5810(c)]
  - a) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the installation for the last 12-month period to determine the applicable organic HAP emissions limit. To do this, multiply the individual organic HAP emissions limits in Table 3 of MACT WWWW for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 3 of MACT WWWW. [§63.5810(c)(1)]

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL<sub>i</sub>=organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;  
Material<sub>i</sub>=neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n=number of operations.

- b) Each month calculate the weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4 of §63.5810. [§63.5810(c)(2)]

$$\frac{\text{Actual Weighted Average organic HAP Emissions Factor}}{\text{Factor}} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual  $EF_i$  = Actual organic HAP emissions factor for operation type i, lbs/ton;  
 $Material_i$  = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;  
 $n$  = number of operations.

- c) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the installation is in compliance. [§63.5810(c)(3)]

**Continuous Compliance:**

- 1) The permittee shall demonstrate continuous compliance with each standard in §63.5805 that applies according to the following methods: [§63.5900(a)]
  - a) Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 to MACT WWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d). [§63.5900(a)(2)]
  - b) Compliance with organic HAP content limits in Table 7 to MACT WWW is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to MACT WWW, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to MACT WWW, as discussed in §63.5895(d). [§63.5900(a)(3)]
  - c) Compliance with the work practice standards in Table 4 to MACT WWW is demonstrated by performing the work practice required. [§63.5900(a)(4)]
- 2) The permittee shall report each deviation from the applicable standards in §63.5805. The deviations shall be reported according to the requirements in §63.5910. [§63.5900(b)]
- 3) During periods of startup, shutdown or malfunction, the permittee shall meet the applicable organic HAP emissions limits and work practice standards. [§63.5900(c)]
- 4) Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of malfunction for those affected sources are not violations if the permittee demonstrates to the Administrator's satisfaction that the permittee was operating in accordance with §63.6(e)(1). The Administrator will determine whether deviations that occur during a period of startup, shutdown, and malfunction are violations, according to the provisions in §63.6(e). [§63.5900(e)]

**Monitoring/Recordkeeping:**

- 1) The permittee shall retain records of resin and gel coat use, organic HAP content, and operation where the resin is used to meet any organic HAP emissions limits based on an organic HAP emissions limit in Table 3 to MACT WWW. The permittee shall retain records of resin and gel coat use, organic HAP content, and operation where the resin is used to meet any organic HAP

content limits in Table 7 to MACT WWWW when averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [§63.5895(c)]

- 2) Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, the permittee shall retain the records of resin and gel coat organic HAP content, and the permittee shall include the list of these resins and gel coats and identify their application methods in each semi-annual compliance report. If after having initially demonstrated that a specific combination of an individual resin or gel coat and application method meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the permittee changes the application method, then the permittee shall again demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph §63.5810 (a). If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 of MACT WWWW, the permittee shall begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average. [§63.5895(d)]
- 3) The permittee shall retain the following records: [§63.5915(a)]
  - a) A copy of each notification and report that the permittee submitted to comply with MACT WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv). [§63.5915(a)(1)]
  - b) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [§63.5915(a)(2)]
- 4) The permittee shall retain all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 3 and 7 to MACT WWWW. [§63.5915(c)]
- 5) The permittee shall retain a certified statement that the permittee is in compliance with the work practice requirements in Table 4 to MACT WWWW, as applicable. [§63.5915(d)]
- 6) The permittee shall retain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1). [§63.5920(a)]
- 7) As specified in §63.10(b)(1), the permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.5920(b)]
- 8) The permittee shall retain each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records offsite for the remaining three years. [§63.5920(c)]
- 9) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [§63.5920(d)]

**Reporting:**

- 1) The permittee shall submit each report in Table 14 to MACT WWWW that applies. [§63.5910(a)]
- 2) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee shall submit each report by the date specified in Table 14 to MACT WWWW and according to the following requirements: [§63.5910(b)]
  - a) Compliance reports shall cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.5910(b)(3)]

- b) Compliance reports shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.5910(b)(4)]
- c) As the permittee is subject to permitting requirements under 40 CFR Part 70, the permittee may submit their 40 CFR Part 63, Subpart WWWW compliance reports in conjunction with their 40 CFR Part 70 semi-annual monitoring reports. [§63.5910(b)(5)]
- 3) The compliance report shall contain the information in following: [§63.5910(c)]
  - a) Company name and address. [§63.5910(c)(1)]
  - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.5910(c)(2)]
  - c) Date of the report and beginning and ending dates of the reporting period. [§63.5910(c)(3)]
  - d) If the permittee had a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with their startup, shutdown, and malfunction plan, the compliance report shall include the information in §63.10(d)(5)(i). [§63.5910(c)(4)]
  - e) If there are no deviations from any organic HAP emissions limitations, and there are no deviations from the requirements for work practice standards in Table 4 to MACT WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [§63.5910(c)(5)]
- 4) For each deviation from an organic HAP emissions limitation and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report shall contain the information in paragraphs §63.5910(c)(1) through (4) and in paragraphs §63.5910(d)(1) and (2). This includes periods of startup, shutdown, and malfunction. [§63.5910(d)]
- 5) Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 shall report all deviations as defined in this subpart in the semi-annual monitoring report required by §70.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to MACT WWWW along with, or as part of, the semi-annual monitoring report required by §70.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.5910(g)]
- 6) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 to MACT WWWW this subpart, and not based on the requirements in §63.999. [§63.5910(h)]
- 7) Where multiple compliance options are available, the permittee shall state in each compliance report if the permittee has changed compliance options since their last compliance report. [§63.5910(i)]
- 8) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 9) The permittee shall report any deviations from the open molding organic HAP emission factors, organic HAP content, standards, open molding compliance options, general requirements, initial compliance, continuous compliance, monitoring/recordkeeping, notification, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

**PERMIT CONDITION PW003**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit #102006-008, Issued October 11, 2006

The permittee shall keep all of the solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers. [Special Condition #2]

**PERMIT CONDITION PW004**

10 CSR 10-6.220, Restrictions of Emissions of Visible Air Contaminants

**Emission Limitation:**

- 1) The permittee shall not cause or allow permit emissions to be discharged into the atmosphere from any **new** source (installed or constructed after February 24, 1971) any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The 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.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachment A (or its equivalent), 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) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

**Reporting:**

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.

### III. Emission Unit Specific Emission Limitations

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

<b>PERMIT CONDITION 1</b>	
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes	
EQ Reference	Description
EP-01	Gelcoat Spray Booth #1
EP-02	Resin Spray Booth #3
EP-03	Tooling Gelcoat for molds/ Fiberglass Resin Spray Booth #2 and sifting of travina stone

**Operational Requirements:**

- 1) These units are provided a conditional exemption from this rule per §6.400(1)(B)14.
- 2) The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring, and maintenance requirements for the associated control devices.

**Monitoring:**

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

**Recordkeeping:**

- 1) The permittee shall maintain records of inspections of mat/panel filters when they occur.
  - a) All inspections, corrective actions, and instrument calibrations shall be recorded.
  - b) Attachment E contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 2) All records shall be kept on-site for a minimum of five (5) years and made available to the Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

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

## IV. Core Permit Requirements

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

### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) 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.
- 3) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 4) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

- j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
  - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
  - 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
  - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

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

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

#### **10 CSR 10-6.150 Circumvention**

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

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

**Emission Limitation:**

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

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

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

**10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is not federally enforceable.**

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

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

**Emission Limitation:**

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The 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.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachment A (or its equivalent), 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) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

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

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

the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

**10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

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

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

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

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

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

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

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

**10 CSR 10-6.065(5)(C)1.A General Requirements**

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

None

**10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

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

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

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

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

This permit may be reopened for cause if:

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

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

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

## **VI. Attachments**

Attachments follow.











**Attachment F**  
Equations to Calculate Organic HAP Emission Factors

**Table 1 to Subpart WWWW of Part 63 – Equations to Calculate Organic HAP Emission Factors for Specific Open Molding Process Streams**

	Type of Coating Operation	Process Description	Organic HAP Emission Factor Equation (lb/ton resin/gel coat applied)	
			Materials Containing <33% HAPs	Materials Containing ≥33% HAPs
<b>Open Molding Operation</b>	Manual Resin Application	Nonvapor-Suppressed Resin	$EF = 0.126 \times \% \text{ HAP} \times 2000$	$EF = [(0.286 \times \% \text{ HAP}) - 0.0529] \times 2000$
		Vapor-Suppressed Resin	$EF = 0.126 \times \% \text{ HAP} \times 2000 \times [1 - (0.5 \times \text{VSE Factor})]$	$EF = [(0.286 \times \% \text{ HAP}) - 0.0529] \times 2000 \times [1 - (0.5 \times \text{VSE Factor})]$
	Atomized Mechanical Resin Application	Nonvapor-Suppressed Resin	$EF = 0.169 \times \% \text{ HAP} \times 2000$	$EF = [(0.714 \times \% \text{ HAP}) - 0.18] \times 2000$
		Vapor-Suppressed Resin	$EF = 0.169 \times \% \text{ HAP} \times 2000 \times [1 - (0.45 \times \text{VSE Factor})]$	$EF = [(0.714 \times \% \text{ HAP}) - 0.18] \times 2000 \times [1 - (0.45 \times \text{VSE Factor})]$
	Nonatomized Mechanical Resin Application	Nonvapor-Suppressed Resin	$EF = 0.107 \times \% \text{ HAP} \times 2000$	$EF = [(0.157 \times \% \text{ HAP}) - 0.0165] \times 2000$
		Vapor-Suppressed Resin	$EF = 0.107 \times \% \text{ HAP} \times 2000 \times [1 - (0.45 \times \text{VSE Factor})]$	$EF = [(0.157 \times \% \text{ HAP}) - 0.0165] \times 2000 \times [1 - (0.45 \times \text{VSE Factor})]$
	Atomized Mechanical Resin Application with Robotic or Automated Spray Control	Nonvapor-Suppressed Resin	$EF = 0.169 \times \% \text{ HAP} \times 2000 \times 0.77$	$EF = 0.77 \times [(0.714 \times \% \text{ HAP}) - 0.18] \times 2000$
	Filament Application	Nonvapor-Suppressed Resin	$EF = 0.184 \times \% \text{ HAP} \times 2000$	$EF = [(0.2746 \times \% \text{ HAP}) - 0.0298] \times 2000$
		Vapor-Suppressed Resin	$EF = 0.12 \times \% \text{ HAP} \times 2000$	$EF = [(0.2746 \times \% \text{ HAP}) - 0.0298] \times 2000 \times 0.65$
	Atomized Spray Gel Coat Application	Nonvapor-Suppressed Resin	$EF = 0.445 \times \% \text{ HAP} \times 2000$	$EF = [(1.03646 \times \% \text{ HAP}) - 0.1959] \times 2000$
	Nonatomized Spray Gel Coat Application	Nonvapor-Suppressed Resin	$EF = 0.185 \times \% \text{ HAP} \times 2000$	$EF = [(0.4506 \times \% \text{ HAP}) - 0.0505] \times 2000$
	Atomized Spray Gel Coat Application Using Robotic or Automated Spray	Nonvapor-Suppressed Resin	$EF = 0.445 \times \% \text{ HAP} \times 2000 \times 0.73$	$EF = [(1.03646 \times \% \text{ HAP}) - 0.195] \times 2000 \times 0.73$

<sup>1</sup>Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

<sup>2</sup>The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of Appendix A to this subpart.

<sup>3</sup>Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

**Attachment F**

Tables 3, 4, and 7 to Subpart WWWW of Part 63

**Table 3 to Subpart WWWW of Part 63 – Organic HAP Emissions Limits for Open Molding Sources.**  
As specified in §63.5805, the permittee shall meet the following organic HAP Emission Limits:

<b>Operation</b>	<b>Type of Coating Operation</b>	<b>Organic HAP Emission Limit (lb/ton)<sup>1</sup></b>
Open Molding - Corrosion-Resistant and/or High Strength (CR/HS)	Mechanical Resin Application	113
	Filament Application	171
	Manual Resin Application	123
Open Molding - Non-CR/HS	Mechanical Resin Application	88
	Filament Application	188
	Manual Resin Application	87
Open Molding - Tooling	Mechanical Resin Application	254
	Manual Resin Application	157
Open Molding - Low-Flame Spread/Low-Smoke Products	Mechanical Resin Application	497
	Filament Application	270
	Manual Resin Application	238
Open Molding - Shrinkage Controlled Resins	Mechanical Resin Application	354
	Filament Application	215
	Manual Resin Application	180
Open Molding - Gel Coat <sup>2</sup>	Tooling Gel Coating	440
	White/Off White Pigmented Gel Coating	267
	All Other Pigmented Gel Coating	377
	CR/HS or High Performance Gel Coat	605
	Fire Retardant Gel Coat	854
	Clear Production Gel Coat	522

<sup>1</sup>The permittee shall be at or below these values based on a 12-month rolling average.

<sup>2</sup>If the permittee only applies gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If the permittee uses multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the permittee may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

**Table 4 to Subpart WWWW of Part 63 – Work Practice Standards**

<b>Operation</b>	<b>Work Practice Standards</b>
Cleaning Operations	The Permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
HAP-Containing Materials Storage Operations	The Permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
Mixing Operations	The Permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to one inch are permissible around mixer shafts and any required instrumentation.
Mixing Operations	The Permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety
Mixing Operations	The Permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

**Table 7 to Subpart WWW of Part 63 – Options Allowing Use of the Same Resin Across Different Operations That Use the Same Resin Type**

As specified in §63.5810(d), when electing to use the same resin(s) for multiple resin application methods, the permittee may use any resin(s) with an organic HAP content less than or equal to the values shown in the following table, or any combination of resins whose weighted average organic HAP content based on a 12-month rolling average is less than or equal to the values shown the following table:

<b>Resin type</b>	<b>Application Method</b>	<b>Type of Coating Application</b>	<b>Maximum Allowable Percent Organic HAP Content</b>
CR/HS Resins	Nonatomized Mechanical	Filament Application	46.4
		Manual	46.4
	Filament Application	Manual	42
Non-CR/HS Resins	Filament Application	Mechanical <sup>1</sup>	45
		Manual	45
	Nonatomized Mechanical	Manual	38.5
Tooling Resins	Nonatomized Mechanical	Manual	91.4
	Manual	Atomized Mechanical	45.9

<sup>1</sup> Nonatomized mechanical application must be used

## STATEMENT OF BASIS

### **Voluntary Limitations**

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

### **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received March 15, 2013;
- 2) 2011 Emissions Inventory Questionnaire, received March 15, 2013; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

### **Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

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

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

None

### **Construction Permit Review**

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

#### Construction Permit #102006-008

This permit was issued October 11, 2006 for remedial action. This permit contains all equipment at the installation, and contains two special conditions that apply plant wide. Special Condition #1 limits the installation to less than 250 tons of VOC in any consecutive 12 month period. This condition was not included in the Operating Permit because the voluntary condition taken to obtain this Intermediate Operating Permit is more stringent. Special Condition #2 requires all solvent and cleaning solutions be kept in covered, labeled containers. This condition appears in the permit as Permit Condition PW003.

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

None

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

40 CFR 63 Subpart WWWW-National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

The installation is subject to this regulation because they were a major source when the first compliance deadline passed. Although the installation accepted a voluntary limit on HAP emissions below the major source threshold to obtain this Intermediate Operating Permit, due to EPA's "Once in, Always in" policy, this source is still subject to this MACT.

The installation meets the definition of existing. The installation does not perform continuous laminating, casting, or pultrusion operations. The installation does not use any control devices to maintain compliance with this regulation. Therefore, the provisions of the rule that apply to these operations are not included in this Operating Permit.

The installation has chosen to use the weighted average option per §63.5810(c) to demonstrate compliance with the emission standards. This option requires a monthly determination of a weighted average emission limit for resins and gelcoats subject to the emission limit.

Work Practice Standards (see Table 4)

#### Cleaning:

Only HAP free cleaning agents be used. The installation only uses acetone, which satisfies this requirement.

#### Storage:

All containers are to be kept closed except during the addition or removal of HAP containing materials. Countertop resins are pumped from closed storage containers to a day tank. This container must be closed at all times resin is not being received.

#### Mixing:

Manual mixing of composite used in polymer casting of countertops takes place in an open container. Footnote 1 of Table 4 states that, for polymer casting mixing operations, containers with a surface area of 500 in<sup>2</sup> or less may be open while active mixing is taking place. The tank has a diameter of 23 inches, and therefore has a surface area less than 500 in<sup>2</sup>.

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

None

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
CO	0.189
HAP	≤ 25
Styrene	≤10
NO <sub>x</sub>	1.11
PM <sub>10</sub>	4.45
SO <sub>x</sub>	0.005
VOC	≤ 100

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

**Other Regulatory Determinations**

Propane heaters (EP-05)

These units do not have any unit specific limitations because they will always be in compliance with 10 CSR 10-6.405, and are exempt from 10 CSR 10-6.260 and 10 CSR 10-6.400.

Compliance demonstration for 10 CSR 10-6.405, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

EP-##	Description	MHDR	Units	PM Emission Factor (lb/MMBtu)	PM Potential to Emit (lb/hr)	Emission Limit (lb/hr)
EP-05	Propane heaters – Total	0.01	1000 gallons/hr	0.0066	0.01	0.69
		1.16	MMBtu/hr			

Emission Factor Source: WebFIRE SCC 10500110

Heating value of Propane: 91.5 MMBtu/1000 gallon per AP42 Section 1.5

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Sources*  
Spray Booths EP-01, EP-02, and EP-03

These units have a conditional exemption from this rule by 10 CSR 10-6.400(1)(B)12. The installation uses panel filters on all of these booths to control particulates at a removal rate of at least 95%. In order for this exemption to be used, the operation, maintenance, and monitoring requirements listed in Permit Condition 1 must be followed for the emission units and the control equipment.

Belt Sander

These will always be in compliance with 10 CSR 6.400 because the uncontrolled potential emissions are less than the emissions limit established by the regulation, as shown below, using the emission factor provided in the Operating Permit application:

$$E = 4.1P^{0.67}$$

$$P = \left( 5.6 \frac{\text{countertops}}{\text{hr}} \right) \left( 146 \frac{\text{lbs}}{\text{countertop}} \right) \left( \frac{1 \text{ ton}}{2000 \text{ lbs}} \right) = 0.41 \frac{\text{tons}}{\text{hr}}$$

Emission limit=2.25 lb/hr

$$\text{Uncontrolled Potential to Emit PM} = \left( 5.6 \frac{\text{countertop}}{\text{hr}} \right) \left( 0.18 \frac{\text{lb PM}}{\text{countertop}} \right) = 1.01 \frac{\text{lb PM}}{\text{hr}}$$

1.01 < 2.25, therefore this unit is always in compliance.

**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).

## MEMORANDUM

DATE: July 31, 2014  
TO: 2013-03-052  
FROM: David Buttig, Operating Permits Unit  
SUBJECT: Response to Public Comments

A draft of the Master Marble Inc's Intermediate Operating Permit was placed on public notice on July 22, 2014, by the Missouri Department of Natural Resources (MDNR). Comments were received on July 31, 2014 from Robert Cheever, Environmental Engineer in the Air Permitting and Compliance Branch of the Environmental Protection Agency Region 7. The seven (7) comments are presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following.

### **EPA Comment #1:**

Plant wide emission limitations, Section II, includes two (2) permit conditions with the label PW002 and yet there is no permit condition PW001. EPA suggests MDNR change one of the PW002 permit conditions to PW001.

### **Missouri Air Pollution Control Program Response to EPA Comment #1:**

Numbering error has been corrected. The first permit condition has been renumbered to Permit Condition PW001.

### **EPA Comment #2:**

The first monitoring / recordkeeping requirement in the first plant wide permit condition requires the permittee to use emission factors calculated according to procedures of 40 CFR Part 63, Subpart WWWW. However, the citation for this permit condition only references 10 CSR 10-6.020(2)(I)24 and 10 CSR 10-6.065(5)(C)2. If the permittee is required to calculate emission factors according to 40 CFR Part 63, subpart WWWW (MACT WWWW), then EPA recommends MDNR include the MACT WWWW reference in the permit condition citation. Also, EPA recommends that monitoring / recordkeeping requirement 1) should reference Table 1, included in the Statement of Basis as the source of the emission factor calculations. Finally, 40 CFR 63.5796 should be included as the specific regulatory citation for this monitoring / recordkeeping requirement.

**Missouri Air Pollution Control Program Response to EPA Comment #2:**

The recommendations have been included in the operating permit.

**EPA Comment #3:**

The second emission limitation in the second plant wide permit condition PW002, refers the permittee to Table 3 and Table 4 of 40 CFR Part 63, subpart WWWW. Both Table 3 and Table 4 are included in the Statement of Basis, therefore, EPA recommends MDNR include a reference to the Statement of Basis within this permit condition.

**Missouri Air Pollution Control Program Response to EPA Comment #3:**

References for Tables 3 and 4 have been included in permit condition PW002. The references refer to Attachment F

**EPA Comment #4:**

The monitoring, continuous compliance demonstrations and recordkeeping requirements in the second plant wide permit condition PW002 refer to Table 5 and Table 7. However, neither Table 5 nor Table 7 are included in the Statement of Basis. For consistence, EPA recommends MDNR include Table 5 and Table 7 in the Statement of Basis. If Table 5 and Table 7 have not been included in the Statement of Basis because they are not applicable to the permittee's installation, MDNR should consider modifying the applicable requirements to eliminate reference to Table 5 and Table 7. Finally, the reporting requirement 2), in this second plant wide permit condition, references the Administrator and EPA suggests MDNR consider the Director as a more appropriate individual to be referenced.

**Missouri Air Pollution Control Program Response to EPA Comment #4:**

All references to Table 5 have been removed from the permit. Table 7 has been included in the permit as Attachment F.

The mention of Administrator has been changed to Director.

**EPA Comment #5:**

Emission limitation 1) in permit condition PW004 limits the permittee to a maximum opacity of 20% from any **new** source of visible emissions. EPA recommends MDNR define what is meant by **new**.

**Missouri Air Pollution Control Program Response to EPA Comment #5:**

The definition of new has been included in Permit Condition PW004.

**EPA Comment #6:**

Permit Condition 1, in Section III (Emission Unit Specific Emission Limitations) includes an operational requirement for the permittee to comply with operation, monitoring and maintenance for associated

control devices. The second paragraph under Maximum Achievable Control Technology (MACT) Applicability on page 2 of the Statement of Basis says the installation does not use any control devices. So, there appears to be a conflict between the Statement of Basis and Permit Condition 1 and EPA suggests MDNR rectify this apparent discrepancy.

**Missouri Air Pollution Control Program Response to EPA Comment #6:**

The control devices associated with EP-01, EP-02, and EP-03 is for the control of particulate matter. There are no control devices associated with these emission units for the control of HAP emissions. Therefore, there are no control devices that are used for compliance with MACT WWWW.

No changes have been made to the permit.

**EPA Comment #7:**

The discussion included under the MSCT Applicability in the Statement of Basis details the types of operations not performed by Master Marble at their Holden installation. However, the MACT WWWW Tables included in the Statement of Basis appear to include all requirements, even those they may not apply. EPA suggests MDNR annotate the Tables from MACT WWWW in the Statement of Basis to include only the requirements applicable to the installations operations.

**Missouri Air Pollution Control Program Response to EPA Comment #7:**

The operations not included at the facility have been removed from the tables included in the operating permit.

## MEMORANDUM

DATE: August 06, 2014  
TO: 2013-03-052  
FROM: David Buttig, Operating Permits Unit  
SUBJECT: Response to Public Comments

A draft of the Master Marble Inc's Intermediate Operating Permit was placed on public notice on July 22, 2014, by the Missouri Department of Natural Resources (MDNR). Comments were received on August 06, 2014 from Robert Cheever, Environmental Engineer in the Air Permitting and Compliance Branch of the Environmental Protection Agency Region 7. The one (1) comment is presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following.

### **EPA Comment #1:**

Master Marble Inc. submitted a complete Application for Authority to Construct on January 17, 2003 and the application was submitted as "remedial action for constructing without a permit." According to the Emission Inventory Questionnaires (EIQs) submitted in 2003 and 2004, Master Marble had exceeded the 10 tons per year for an individual hazardous air pollutant (HAP) and were considered a major source subject to MACT Subpart WWWW. Master Marble was issued an "after-the-fact" Permit to Construct by MDNR on October 11, 2006. This Permit to Construct indicates that MDNR considered Master Marble a Part 70 source and indicated a Part 70 Operating Permit application was required within 1 year of equipment startup. Also, this Permit to Construct established a volatile organic compound (VOC) limit of less than 250 tons of VOC per year from the installation in any consecutive 12-month period. There were no limits imposed on HAPs, other than meeting the applicable requirements of 40 CFR Part 63, Subpart WWWW; the MACT standards for Reinforced Plastic Composites Production. The installation description within the permit to construct indicates that Master Marble was issued a Notice of Violation (NOV) for failure to submit an initial notification required by 40 CFR Part 63, subpart WWWW.

The draft operating permit on public notice is an Intermediate State Permit to Operate which includes a Plant wide Permit Condition PW002 (which should be PW001). This permit condition indicates it is a voluntary limitation of VOC to less than 100 tons per year and HAPs of less than 10/25 tons per year

taken to avoid Title V. This voluntary limitation permit condition is not valid and Master Marble should be applying for and should be issued a Title V / Part 70 operating permit in lieu of an Intermediate State Permit to Operate. I refer you to the Seitz Memo of May 16, 1995 regarding the “Potential to Emit for MACT Standards—Guidance on Timing Issues.”

The 5/16/1995 Seitz Memo address three issues; two of which appear relevant to Master Marble’s operating permit question. First, the Seitz memo clarifies that facilities may switch from major source to area source status at any time until the “first compliance date” of the standard. Table 2 in 40 CFR 63, subpart WWWW says a facility is an existing source and is a major source on or before the publication date of this subpart; which was April 21, 2003. Additionally, an existing source must comply with subpart WWWW by April 21, 2006 or accept and meet an enforceable HAP emission limit below the major source threshold prior to April 21, 2006. Second, the Seitz memo clarified that facilities that are major sources for HAPs on the “first compliance date” (April 21, 2006 for subpart WWWW) are required to comply permanently with the MACT standard to ensure that maximum achievable reductions in toxic emissions are achieved and maintained.

Master Marble’s Permit to Construct (#102006-008) was issued almost 6-months after Master Marble was to be in compliance with the applicable requirements on MACT WWWW. Additionally, the Permit to Construct did not establish an enforceable HAP limit below major source threshold, therefore Master Marble continues to be a major source for purposes of the Reinforced Plastic Composites Production MACT.

Therefore EPA recommends that MDNR strongly consider Master Marble Inc. is a major source and as such is subject to the requirements of Part 70 and MDNR should issue Master Marble a Part 70 Operating Permit.

#### **Missouri Air Pollution Control Program Response to EPA Comment #1:**

The APCP has included MACT WWWW into the current draft of the Intermediate Operating Permit. The permit condition includes the requirements that Master Marble must comply with since the facility was once a major source of HAPs emissions.

In the October 11, 2006 Permit to Construct, Master Marble was required to submit an application for a Part 70 Operating Permit. When that permit was being written, Master Marble agreed to a 10/25 HAPs and 100 tons VOC facility wide emission limitations in order to obtain an Intermediate Operating Permit. This limitation does not remove the status of Master Marble being subject to MACT WWWW due the Seitz Memo mentioned in the comment. This limitation does however provide a way to remain a synthetic minor source and to not be subject to other MACT regulations for major sources.

Master Marble has the option to receive either a Part 70 operating permit or an Intermediate operating permit. Since an intermediate operating permit was applied for and the voluntary emission limitations have been requested again, the APCP will not make any changes to the permit due to this comment.



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

[www.dnr.mo.gov](http://www.dnr.mo.gov)

**MAR 29 2016**

Mr. Rick Huffman  
Master Marble, Inc.  
P.O. Box 185  
Holden, MO 64040

Re: Master Marble, Inc., 101-0054  
Permit Number: **OP2016-006**

Dear Mr. Huffman:

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

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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in black ink that reads "Michael J. Stansfield". The signature is written in a cursive style with a large, stylized "M" and "S".

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

MJS/dbk

Enclosures

c: PAMS File: 2013-03-052

