



Missouri Department of Natural Resources  
Air Pollution Control Program

## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2012-038  
**Expiration Date:** OCT 10 2017  
**Installation ID:** 071-0068  
**Project Number:** 2011-01-020

**Installation Name and Address**

Meramec Group, Inc.  
338 Ramsey Street  
Sullivan, MO 63080  
Franklin County

**Parent Company's Name and Address**

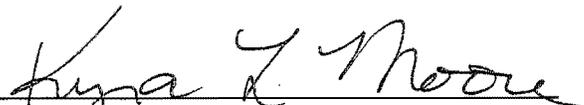
Meramec Group, Inc.  
338 Ramsey Street  
Sullivan, MO 63080

**Installation Description:**

Meramec Group, Inc. manufactures molded polyurethane shoe soles and industrial plastic parts. Isocyanate prepolymer and polyurethane polyol mixture are mixed and poured into molds that are pre-sprayed with a mold release compound and occasionally pre-sprayed with lacquer. After removal from the molds, the products are either directly shipped or sprayed coated with lacquer and then shipped. The installation is a major source of volatile organic compounds.

OCT 11 2012

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Meramec Group, Inc. manufactures molded polyurethane shoe soles and industrial plastic parts. Isocyanate prepolymer and polyurethane polyol mixture are mixed and poured into molds that are pre-sprayed with a mold release compound and occasionally pre-sprayed with lacquer. After removal from the molds, the products are either directly shipped or sprayed coated with lacquer and then shipped. The installation is a major source of volatile organic compounds.

The reported actual emissions for the past five years for the installation are listed below:

| <b>Reported Air Pollutant Emissions, tons per year</b>   |       |       |       |       |       |
|--|-------|-------|-------|-------|-------|
| Pollutants   | 2010  | 2009  | 2008  | 2007  | 2006  |
| Particulate Matter<br>≤ Ten Microns (PM <sub>10</sub> )  | 0.72  | 0.81  | 0.68  | 0.76  | 0.04  |
| Particulate Matter<br>≤ 2.5 Microns (PM <sub>2.5</sub> ) | ---   | ---   | ---   | ---   | ---   |
| Sulfur Oxides<br>(SO <sub>x</sub> )                      | ---   | ---   | ---   | ---   | ---   |
| Nitrogen Oxides<br>(NO <sub>x</sub> )                    | 0.32  | 0.23  | 0.31  | 0.30  | 0.25  |
| Volatile Organic<br>Compounds(VOC)                       | 44.38 | 32.32 | 37.84 | 45.46 | 47.27 |
| Carbon Monoxide<br>(CO)                                  | 0.07  | 0.05  | 0.06  | 0.06  | 0.05  |
| Lead<br>(Pb)   | ---   | ---   | ---   | ---   | ---   |
| Hazardous Air Pollutants<br>(HAPs)                       | 0.201 | 0.215 | 0.195 | 0.178 | 0.162 |
| Ammonia (NH <sub>3</sub> )                               | ---   | ---   | ---   | ---   | ---   |

Note: The HAPs emissions were reported as VOCs on Form 2T pages of the Emission Inventory Questionnaires in the applicable years.

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### **EMISSION UNITS WITH LIMITATIONS**

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

| <u>Emission Unit #</u> | <u>Description of Emission Unit</u>  |
|------------------------|--------------------------------------|
| PROC01                 | Polyurethane Molding Lines           |
| PROC02A                | Paint Spray Booths                   |
| PROC02B                | Paint Spray Booth for Urethane Molds |
| PROC02C                | Plasma Metal Spray Booth             |
| PROC02D                | Loni Finishing Process               |
| PROC02E                | Automated Painting Process           |
| PROC05                 | Epoxy Application                    |
| PROC07A                | Sandblasting                         |
| PROC07B                | Abrasive Cleaning with Glass Beads   |
| EU-29                  | New Molding Line                     |

### **EMISSION UNITS WITHOUT LIMITATIONS**

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

#### Description of Emission Source

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Mold Cleaner  
Boilers, Natural Gas Fired, 2.3115 MMBtu/hr  
Space Heaters, Natural Gas Fired, 2.18 MMBtu/hr  
Water Heaters, Natural Gas Fired, 1.6742 MMBtu/hr

## II. Plant Wide Emission Limitations

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

### PERMIT CONDITION PW001

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

#### **Emission Limitation:**

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

#### **Monitoring:**

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

#### **Recordkeeping:**

1. The permittee shall maintain records of all observation results (see Attachments A and B), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment B)

4. Attachments A, B and C contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

**Reporting:**

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

**PERMIT CONDITION PW002**

10 CSR 10-6.060

Construction Permits Required

Construction Permit 072002-010A

**Control of Odors:**

If a continuous situation of demonstrated nuisance odors exist in violation of Missouri State Rule 10 CSR 10-5.160, Control of Odors in the Ambient Air, the Director may require Meramec Group, Inc. to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. Meramec Group, Inc. shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such plan shall be a violation of the permit. [Special Condition 4]

### III. Emission Unit Specific Emission Limitations

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

| <b>PERMIT CONDITION 1</b><br>10 CSR 10-6.060<br>Construction Permits Required<br>Construction Permit 072002-010A |   |  |
|--|---|--|
| EU ID  | General Description   | Manufacturer/<br>Model #                                   |
| PROC01   | Eight (8) Polyurethane Molding Lines<br>Installed post-1972   | Custom Made  |
| PROC02A  | Paint Spray Booths, Installed 2000<br>Four (4) Manual Spray Booths, Base Coat Application,<br>Top Coat Application and Masked Paint Application | Fancu PM61   |
| PROC02B  | Paint Spray Booth for Urethane Molds<br>Installed 1981  | Custom Paint Booth with Devilbiss<br>Gun                   |
| PROC02C  | Plasma Metal Spray Booth<br>Installed 1991  | Binks Booth With Tafa Hobart<br>Metal Sprayer, Model 30-8A |
| PROC07A  | Sandblasting<br>Installed 1991  | Clemco, Model BNP56-<br>300R&DF1Ph                         |
| PROC07B  | Abrasive Cleaning of Metal parts with Glass Beads,<br>Installed 1991  | Speedblaster, Model 007                                    |
| PROC05   | Epoxy Application, Installed 1991   | Not Available  |

**Emission Limitation:**

Meramec Group, Inc. shall emit less than 40.0 tons of VOCs into the atmosphere from both paint lines (PROC02A) and the usage of n-pentane as a blowing agent (PROC01) at Meramec Industries; and the paint booth (PROC2B), and the epoxy application (PROC05) at MoldTech in any consecutive 12-month period. [\[Special Condition 2A\]](#)

**Monitoring/Recordkeeping:**

Meramec Group, Inc. shall maintain the monthly and the sum of the most recent consecutive 12-month records of VOCs emissions from both paint lines (PROC02A) and the usage of n-pentane as a blowing agent (PROC01) at Meramec Industries; and the paint booth (PROC02B), and the epoxy application (PROC05) at MoldTech. Meramec Group, Inc. shall use Attachment D, or an equivalent form to demonstrate compliance with the VOCs emission limitation of Permit No. 072002-010A. Meramec Group, Inc. shall maintain all records required by Permit No. 072002-010A for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [\[Special Condition 2B\]](#)

**Reporting:**

Meramec Group, Inc. shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of each month, if the records indicate that the 12-month cumulative total of VOCs emissions exceeded the limitation of Special Condition 2A (40 tons of VOC). [\[Special Condition 2C\]](#)

| <b>PERMIT CONDITION 2</b><br>10 CSR 10-6.060<br>Construction Permits Required<br>Construction Permit 072002-010A |   |   |
|--|---|---|
| EU ID  | General Description   | Manufacturer/<br>Model #                                |
| PROC02B  | Paint Spray Booth for Urethane Molds                              | Custom Paint Booth with Devilbiss Gun                   |
| PROC02C  | Plasma Metal Spray Booth  | Binks Booth With Tafa Hobart Metal Sprayer, Model 30-8A |
| PROC07A  | Sandblasting  | Clemco, Model BNP56-300R&DF1Ph                          |
| PROC07B  | Abrasive Cleaning of Metal parts with Glass Beads, Installed 1991 | Speedblaster, Model 007                                 |

**Emission Limitation:**

- Meramec Group, Inc. shall emit less than 15 tons of particulate matter less than ten microns in diameter (PM<sub>10</sub>) into the atmosphere from the spray booth (PROC02B), the plasma metal spray booth (PROC02C), the sand blaster (PROC07A), and the abrasive cleaner (PROC07B) in any consecutive 12-month period. [\[Special Condition 3A\]](#)
- The fabric dust collector must be in use at all times when the abrasive cleaner with glass beads (PROC07B) is in operation and shall be operated and maintained in accordance with the manufacturer's specifications. [\[Special Condition 5\]](#)

**Monitoring/Recordkeeping:**

Meramec Group, Inc. shall maintain an accurate record of PM<sub>10</sub> emitted into the atmosphere from the spray booth (EPROC02B), the plasma metal spray booth (PROC02C), the sandblaster (PROC07A), and the abrasive cleaner (PROC07B). Attachment F or an equivalent form shall be used to demonstrate compliance with the PM<sub>10</sub> emission limitation of Permit No. 072002-010A. Meramec Group, Inc. shall maintain all records required by Permit No. 072002-010A for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [\[Special Condition 3B\]](#)

**Reporting:**

Meramec Group, Inc. shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of each month, if the records indicate that the 12-month cumulative total of PM<sub>10</sub> emissions exceeded the limitation of Special Condition 3A (15 tons of PM<sub>10</sub>). [\[Special Condition 2C\]](#)

| <p align="center"><b>PERMIT CONDITION 3</b><br/>           10 CSR 10-6.060<br/>           Construction Permits Required<br/>           Construction Permit 042005-002, Issued April 2, 2005</p> |   |   |
|---|---|---|
| EU ID   | General Description   | Manufacturer/<br>Model #                            |
| PROC02D   | LONI Finishing Process – applies paint to finished shoe soles | Motoman and Fanuc<br>Motoman: UP-50<br>Fanuc: M-161 |

**Emission Limitation:**

Meramec Group, Inc. shall emit less than 40.0 tons of VOCs into the atmosphere from the Loni finishing process (PROC02D) in any consecutive 12-month period. [Special Condition 1A]

**Operational Limitation/Equipment Specifications:**

1. High efficiency filters must be in use at all times when the spray guns are in operation and shall be operated and maintained in accordance with the manufacturer’s specifications. [Special Condition 2]
2. The permittee shall keep the paint 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 paints, solvent and cleaning solution containers used with this equipment. [Special Condition 3]

**Monitoring/Recordkeeping:**

Meramec Group, Inc. shall maintain the monthly and the sum of the most recent consecutive 12-month records of VOCs emissions from the Loni finishing process (EU-27) Meramec Group, Inc. shall use Attachment G, or an equivalent form to demonstrate compliance with the VOCs emission limitation of Permit No. 042005-002. Meramec Group, Inc. shall maintain all records required by Permit No. 042005-002 for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition 1B]

**Reporting:**

Meramec Group, Inc. shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of each month, if the records indicate that the 12-month cumulative total of VOCs emissions exceeded the limitation of Special Condition 1A (40 tons of VOC). [Special Condition 1C]

| <p align="center"><b>PERMIT CONDITION 4</b><br/>           10 CSR 10-6.060<br/>           Construction Permits Required<br/>           Construction Permit 062005-003, Issued June 10, 2005<br/>           Construction Permit Amendment 062005-003A, Issued December 9, 2005</p> |   |   |
|---|---|---|
| EU ID   | General Description   | Manufacturer/<br>Model #                            |
| PROC02E   | Automated Painting Process – applies paint to finished shoe soles | Motoman and Fanuc<br>Motoman: UP-50<br>Fanuc: M-161 |

**Emission Limitation:**

Meramec Group, Inc. shall emit less than 40.0 tons of VOCs into the atmosphere from the automated finishing operation (PROC02E) in any consecutive 12-month period. [Permit No. 062005-003A, Special Condition 1A]

**Operational Limitation/Equipment Specifications:**

1. When considering using a paint in the automated finishing operation (EP-28) that is different to those listed in the Application for Authority to Construct, the permittee must calculate the potential emissions for each individual HAP in the alternate paint. If the potential HAP emissions for the alternate paint is equal to greater than 10 tons per year for each individual HAP or 25 tons per year for total HAPs, or if it is equal to or greater than the Screen Modeling Action Levels (SMAL) for any chemical listed in Attachment I, then the permittee must seek approval from the Air Pollution Control Program before use of the alternate paint. [Permit No. 062005-003A, Special Condition 1C]
2. High efficiency filters must be in use at all times when the spray guns are in operation and shall be operated and maintained in accordance with the manufacturer's specifications. [Permit No. 062005-003, Special Condition 2]
3. The permittee shall keep the paint solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable and easily read permanent markings on all paints, solvent and cleaning solution containers used with this equipment. [Permit No. 062005-003, Special Condition 3]

**Monitoring/Recordkeeping:**

1. Meramec Group, Inc. shall maintain the monthly and the sum of the most recent consecutive 12-month records of VOCs emissions from the automated finishing operation (EP-28). Meramec Group, Inc. shall use Attachment G, or an equivalent form approved by the Air Pollution Control Program, to demonstrate compliance with the VOCs emission limitation of Permit No. 062005-003A. [Permit No. 062005-003A, Special Condition 1B]
2. Attachment H or equivalent form approved by the Air Control Program shall be used to demonstrate compliance with Special Condition 1C of Permit Number 062005-003A. [Permit No. 062005-003A, Special Condition 1D]
3. The permittee shall maintain all records required by Permit No. 062005-003A for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used in the automated finishing operation (EU-28). [Permit No. 062005-003A, Special Condition 1B & 1D]

**Reporting:**

Meramec Group, Inc. shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of each month, if the records indicate that the 12-month cumulative total of VOCs emissions exceeded the limitation of Special Condition 1A (40 tons of VOC). [Permit No. 062005-003, Special Condition 1D]

| <b>PERMIT CONDITION 5</b><br>10 CSR 10-6.060<br>Construction Permits Required<br>Construction Permit 032006-009 |                     |                          |
|---|---------------------|--------------------------|
| EU ID   | General Description | Manufacturer/<br>Model # |
| EU-29   | New Molding Line    | Custom Made              |

**Emission Limitation:**

1. Meramec Group, Inc. shall emit less than 40 tons of Volatile Organic Compounds (VOCs) from the molding operations (Emission Points 29a, 29b, 29c) in any consecutive 12-month period. [Special Condition 1A]
2. When considering using a paint in this molding operation that is different to those listed in the Application for Authority to Construct, the permittee must calculate the potential emissions for each individual Hazardous Air Pollutant (HAP) in the alternative paint. If the potential HAP emissions for the alternative paint is equal to or greater than the ten tons per year for each individual HAP or 25 tons per year for total HAPs, or if it is equal to or greater than the Screen Modeling Action Levels (SMAL) for any chemical listed in Attachment I, then Meramec Industries, Inc. must seek approval from the Air Pollution Control Program before using the alternative paint. [Special Condition 1D]
3. High efficiency filters (CD-29) must be in use at all times when the molding operation (Emission Point 29a, 29b, and 29c) is in operation and shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 2]
4. The permittee shall keep the paint solvents and cleaning solutions in sealed containers whenever the materials are not in use. Meramec Industries, Inc. shall provide and maintain suitable, easily read, permanent markings on all paints, solvent and cleaning solution containers used with this equipment. [Special Condition 3]

**Monitoring:**

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

**Reporting:**

Meramec Group, Inc. 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 the end of the month during which the records indicate that the source exceeds the emission limitation. [Special Condition 1C]

| <b>PERMIT CONDITION 6</b>                                       |   |   |
|---|---|---|
| 10 CSR 10-5.330   |   |   |
| Control of Emissions From Industrial Surface Coating Operations |   |   |
| EU ID   | General Description   | Manufacturer/<br>Model #                            |
| PROC02A   | Paint Spray Booths, Installed 2000<br>Four (4) Manual Spray Booths, Base Coat Application,<br>Top Coat Application and Masked Paint Application | Fancu PM61  |
| PROC02B   | Paint Spray Booth for Urethane Molds<br>Installed 1981  | Custom Paint Booth with Devilbiss<br>Gun            |
| PROC02<br>D   | LONI Finishing Process – applies paint to finished<br>shoe soles  | Motoman and Fanuc<br>Motoman: UP-50<br>Fanuc: M-161 |
| PROC02<br>E   | Automated Painting Process – applies paint to finished<br>shoe soles  | Motoman and Fanuc<br>Motoman: UP-50<br>Fanuc: M-161 |
| EU-29   | New Molding Line  | Custom Made   |

**Emission Limitation:**

1. The permittee shall not emit or discharge into the atmosphere any VOC from coating operations in excess of 6.7 lbs. VOC/gallon coating (minus water and non-VOC organic compounds).
2. Work practices. On or after March 1, 2012, work practices shall be used to minimize VOC emissions from solvent storage, mixing operations, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
  - a) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
  - b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials;
  - c) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;
  - d) Clean up spills immediately;
  - e) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one (1) location to another; and
  - f) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

**Monitoring:**

The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG<sub>VW</sub>) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):

1. Calculate the DAVG<sub>VW</sub> of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gallons each coating used (minus water and exempt solvents)

B = lbs VOC/gallon coating (minus water and exempt solvents)

C = total daily gallon coatings used (minus water and exempt solvents)

n = number of all coatings used

- a) The permittee shall determine on a daily basis the volume of coatings consumed, as delivered to the coating applicator(s).
  - b) The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24. MDNR may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine data used in the calculation of the VOC content of coatings by EPA Reference Method 24 or an equivalent or alternative method.
2. If the volume-weighted average mass of VOC per volume of coating (minus water and non-VOC organic compounds), calculated on a daily basis, is less than 6.7 lbs VOC/gallon coating (minus water and non-VOC organic compounds), the source is in compliance. Each daily calculation is a performance test for the purpose of determining compliance with 10 CSR 10-5.330(4)(B).
  3. Records shall be retained for a minimum of five (5) years. These records shall be made available to the Director upon request.

**Recordkeeping:**

1. The owner or operator of a coating line shall keep records detailing specific VOC sources, as necessary to determine compliance (see Attachments E-1 and E-2) These may include:
  - a) The type and the quantity of coatings used daily;
  - b) The coatings manufacturer's formulation data for each coating;
  - c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) The type and quantity of waste solvents reclaimed or discarded daily;
  - f) The quantity of pieces of materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
2. Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration, approved by the Director, that such records are adequate for the purpose of this rule. This will apply until EPA issues national daily emissions recordkeeping protocols for specific industrial classifications.

**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 deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

## IV. Core Permit Requirements

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

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

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

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

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

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

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

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

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

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

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(6)(C)3.B]

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) 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.
- 7) 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.
- 8) 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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations  
(Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

**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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.

- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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| <b>Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone</b> |
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- 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*

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| <b>10 CSR 10-6.280 Compliance Monitoring Usage</b> |
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| <p>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:</p> <ul style="list-style-type: none"><li>a) Monitoring methods outlined in 40 CFR Part 64;</li><li>b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and</li><li>c) Any other monitoring methods approved by the Director.</li></ul> <p>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:</p> <ul style="list-style-type: none"><li>a) Monitoring methods outlined in 40 CFR Part 64;</li><li>b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and</li><li>c) Compliance test methods specified in the rule cited as the authority for the emission limitations.</li></ul> <p>3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:</p> <ul style="list-style-type: none"><li>a) Applicable monitoring or testing methods, cited in:<ul style="list-style-type: none"><li>i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";</li><li>ii) 10 CSR 10-6.040, "Reference Methods";</li><li>iii) 10 CSR 10-6.070, "New Source Performance Standards";</li><li>iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or</li></ul></li><li>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.</li></ul> |
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## 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(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(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) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi-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, this includes deviations or Part 64 exceedances.
  - 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.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semi-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(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(6)(C)1.F Severability Clause**

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

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

**10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

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

**10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None.

**10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **10 CSR 10-6.065(6)(C)6 Permit Shield**

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

#### **10 CSR 10-6.065(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(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide 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, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

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

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

The application utilized in the preparation of this permit was signed by John Offord, Manager of Environmental Compliance and Product Testing. 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(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) 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(6)(E)1.C Statement of Basis**

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

## VI. Attachments

Attachments follow.



**Attachment B**

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

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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



**ATTACHMENT D**

**Construction Permit No. 072002-010A – VOC Compliance Worksheet**

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with Permit Number 072002-010A VOC emissions limitation.

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_  
 (month, year) (month, year)

Copy this sheet as needed

| Column A   | <sup>1</sup> Column B | <sup>2</sup> Column C | <sup>3</sup> Column D                           | <sup>4</sup> Column E     | <sup>5</sup> Column F |
|--|-----------------------|-----------------------|---|---------------------------|-----------------------|
| Month  | Name of Material Used | Location              | Total Monthly Amount of Material Used (gallons) | Emission Factor (lbs/gal) | VOC Emissions (tons)  |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
|  |                       |                       |   |                           |                       |
| <b><sup>6</sup> TOTAL (Tons per 12-Month Period)</b> |                       |                       |   |                           |                       |

- Column B = Material name (please refer to MSDS) used in PROC01/PROC02A (Meramec Industries EP-04 (A-E)+ and EP-10), PROC02B/PROC05 (MoldTech EP-02 and EP-06)
- Column C = Location of material usage (Meramec Industries or MoldTech)
- Column D = Total monthly amount of material used for PROC01 (EP-04(A-E)+), PROC02A (EP-10), EU0030 (EP-02) and PROC05 (EP-06)
- Column E = Emission factor in pounds per gallon (please refer to MSDS)
- Column F = 
$$\left[ \frac{(\text{Column D} \times \text{Column E})}{2000} \right]$$
- Total = (Sum of Column F), total shall be less than 40 tons in any consecutive 12-month period.





**ATTACHMENT F**

**Construction Permit No. 072002-010A – PM<sub>10</sub> Compliance Worksheet**

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with Permit Number 072002-010A PM<sub>10</sub> emissions limitation.

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_  
 (month, year) (month, year)

**Copy this sheet as needed**

| Column A   | Column B               | Column C        | Column D   | Column E                     | Column F  |
|--|------------------------|-----------------|--|------------------------------|---|
| Emission Unit  | Throughput<br>(Note 1) | Units           | PM <sub>10</sub><br>Emission<br>Factor<br>(lbs/unit) | Capture<br>Efficiency<br>(%) | PM <sub>10</sub><br>Emissions<br>(tons)<br>(Note 3) |
| EP4A, Sandblaster  |                        | Lbs of Abrasive | 0.013  | 50                           |   |
|  |                        |                 |  |                              |   |
|  |                        |                 |  |                              |   |
|  |                        |                 |  |                              |   |
|  |                        |                 |  |                              |   |
|  |                        |                 |  |                              |   |
|  |                        |                 |  |                              |   |
|  |                        |                 |  |                              |   |
| PM <sub>10</sub> Emissions from other<br>sources at the installation<br>(Note 2)       |                        |                 |  |                              | 0.01  |
| Total PM <sub>10</sub> Emissions from the Installation for this Month (Note 4)         |                        |                 |  |                              |   |
| 12-Month PM <sub>10</sub> Emissions Total from the Previous Month's Worksheet (Note 5) |                        |                 |  |                              |   |
| Monthly PM <sub>10</sub> Emissions Total from Previous Year's Worksheet (Note 6)       |                        |                 |  |                              |   |
| Current 12-Month Total PM <sub>10</sub> Emissions (Note 7)                             |                        |                 |  |                              |   |

- Note 1: Throughput should be in the units listed in the Column C.
- Note 2: The 0.01 ton of PM<sub>10</sub> is the monthly potential emissions for all other PM<sub>10</sub> emitting sources at the installation, specifically the spray booth (EP-02), the plasma metal spray booth (EP-03), and the abrasive cleaner with glass beads (EP4B). Meramec Group may choose to keep track of the actual PM<sub>10</sub> emissions from these sources rather than using the potential emissions.
- Note 3: Column F = [(Column B x Column D) x (1 - Column E/1000)]/2000
- Note 4: Sum of PM<sub>10</sub> emissions reported in Column F.
- Note 5: Running 12-month total of emissions from previous month's worksheet.
- Note 6: Emissions reported for this month in the last calendar year.
- Note 7: Amount reported for Note 5 minus amount reported for note 6 plus amount reported for Note 4.

**ATTACHMENT G**

**Construction Permit Nos. 042005-002, 062005-003 and 032006-009 – VOC Compliance Worksheet**

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with the VOC emissions limitations throughout the operating permit.

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_  
 (month, year) (month, year)

(b)

**Copy this sheet as needed**

| Column A   | Column B (a)                                  | Column C             | Column D                  | Column E                   |
|--|---|----------------------|---------------------------|----------------------------|
| Material Used<br>(Name, Type)  | Amount of<br>Material Used<br>(Include Units) | Density<br>(lbs/gal) | VOC Content<br>(Weight %) | VOC<br>Emissions<br>(tons) |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
|  |   |                      |                           |                            |
| (b) Total VOC Emissions Calculated for this Month in Tons:                     |   |                      |                           |                            |
| (c) 12-Month VOC Emissions Total from Previous Month's Attachment G, in Tons   |   |                      |                           |                            |
| (d) Monthly VOC Emissions Total (b) from Previous Year's Attachment G, in Tons |   |                      |                           |                            |
| (e) Current 12-Month Total of VOC Emissions in Tons: [(b) + (c) – (d)]         |   |                      |                           |                            |

Instructions: Choose appropriate VOC calculation method for units reported:

- (a) 1) If usage is in tons: - [Column B] x [Column D] = [Column E]
- 2) If usage is in pounds: - [Column B] x [Column D] x [0.0005] = [Column E]
- 3) If Usage is in gallons: - [Column B] x [Column C] x [Column D] x [0.005] = [Column E]
- (c) Summation of [Column E] in tons
- (d) 12-Month VOC emission total (e) from last month's Attachment F, in tons
- (e) Monthly VOC emissions total (b) from previous year's Attachment F, in tons
- (f) Calculate the new 12-month VOC emissions total. A 12-month VOC emissions total (e) of less than 40.0 tons indicates compliance



**ATTACHMENT I**

**Construction Permit Nos. 062005-003A and 032006-009 – Screen Modeling Action Level**

| <b>Chemical</b>                                       | <b>CAS#</b> | <b>Emission Threshold Level (ton/year)</b> | <b>Synonyms</b>  |
|---|-------------|--|--|
| Acetaldehyde  | 75-07-0     | 9  | Acetic Aldehyde, Aldehyde, Ethanal, Ethyl Aldehyde   |
| Acetamide   | 60-35-5     | 1  | Acetic Acid Amide, Ethanamide  |
| Acetonitrile  | 75-05-8     | 4  | Methyl Cyanide, Ethanenitrile, Cyanomethane  |
| Acetophenone  | 98-86-2     | 1  | Acetylbenzene, Methyl Phenyl Ketone, Hypnone   |
| Acetylamino-fluorene, [2-]                            | 53-96-3     | 0.005                                      | N-2-Fluorenyl Acetamide, N-Fluorene-2-yl Acetamide, 2-Acetamidofluorene                              |
| Acrolein  | 107-02-8    | 0.04                                       | Acrylaldehyde, Acrylic Aldehyde, Allyl Aldehyde, Propenal  |
| Acrylamide  | 79-06-1     | 0.02                                       | Propenamide, Acrylic Amide, Acrylamide Monomer, Ethylenecarboxamide                                  |
| Acrylic Acid  | 79-10-7     | 0.6  | Propenoic Acid, Ethylene Carboxylic Acid, Vinylformic Acid   |
| Acrylonitrile   | 107-13-1    | 0.3  | Vinyl Cyanide, Cyanoethylene, Propenenitrile   |
| Allyl Chloride  | 107-05-1    | 1  | 1-Chloro-2-Propene, 3-Chloropropylene, Chloroallylene, Alpha-Propylene                               |
| Aminobiphenyl, [4-]                                   | 92-67-1     | 1  | Biphenylene, P-Phenylaniline, Xenylamine, 4-Aminodiphenyl, 4-Biphenylamine                           |
| Aniline   | 62-53-3     | 1  | Aminobenzene, Phenylamine, Aniline Oil, Aminophen, Arylamine   |
| Anisidine, [Ortho-]                                   | 90-04-0     | 1  | O-Methoxyaniline   |
| Antimony Compounds (except those specifically listed) |             | 5  | Antimony (Pentachloride, Tribromide, Trichloride, Trifluoride)                                       |
| Antimony Pentafluoride                                | 7783-70-2   | 0.1  |  |
| Antimony Potassium Tartrate                           | 28300-74-5  | 1  |  |
| Antimony Trioxide                                     | 1309-64-4   | 1  |  |
| Antimony Trisulfide                                   | 1345-04-6   | 0.1  |  |
| Arsenic and Inorganic Arsenic Compounds               |             | 0.005                                      | Arsenic (Diethyl, Disulfide, Pentoxide, Trichloride, Trioxide, Trisulfide), Arsinine, Arsenous Oxide |
| Benz(a)Anthracene                                     | 56-55-3     | 0.01                                       |  |
| Benz(c)acridine                                       | 225-51-4    | 0.01                                       |  |
| Benzene   | 71-43-2     | 2  | Benzol, Phenyl Hydride, Coal Naphtha, Phene, Benzole, Cyclohexatriene                                |
| Benzidine   | 92-87-5     | 0.0003                                     | 4,4'-Biphenyldiamine, P-Diaminodiphenyl, 4,4'-Diaminobiphenyl, Benzidine Base                        |
| Benzo(a)pyrene  | 50-32-8     | 0.01                                       |  |
| Benzo(b)fluoranthene                                  | 205-992     | 0.01                                       |  |
| Benzotrichloride                                      | 98-07-7     | 0.006                                      | Benzoic Trichloride, Phenylchloroform, Trichloromethylbenzene  |
| Benzyl Chloride                                       | 100-44-7    | 0.1  | Alpha-Chlorotoluene, Toly Chloride   |
| Beryllium Compounds (except Beryllium Salts)          |             | 0.008                                      | Beryllium (Acetate, Carbonate, Chloride, Fluoride, Hydroxide, Nitrate, Oxide)                        |
| Beryllium Salts                                       |             | 0.00002                                    |  |
| Bis(Chloroethyl)Ether                                 | 111-44-4    | 0.06                                       | Dichloroethyl ether, Dichloroether, Dichloroethyl Oxide, BCEE  |
| Bis(Chloromethyl)Ether                                | 542-88-1    | 0.0003                                     | BCME, Sym-Dichloromethyl ether, Dichloromethyl Ether, Oxybis-(Chloromethane)                         |
| Butadiene, [1,3-]                                     | 106-99-0    | 0.07                                       | Biethylene, Biviny, Butadiene Monomer, Divinyl Erythrene, Vinyethylene                               |

| Chemical   | CAS#       | Emission Threshold Level (ton/year) | Synonyms   |
|--|------------|-------------------------------------|--|
| Butylene Oxide, [1,2-]   | 106-88-7   | 1                                   | 1,2-Epoxybutane, 1-Butene Oxide, 1,2-Butene Oxide, Butylene Oxide, Ethylethylene     |
| Cadmium Compounds  |            | 0.01                                | Cadmium (Dust, Fume, Acetate, Chlorate, Chloride, Fluoride, Oxide, Sulfate, Sulfide) |
| Carbon Disulfide   | 75-15-0    | 1                                   | Carbon Bisulfide, Dithiocarbonic Anhydride   |
| Carbon Tetrachloride   | 56-23-5    | 1                                   | Tetrachloromethane, Perchloromethane   |
| Carbonyl Sulfide   | 463-58-1   | 5                                   | Carbon Oxide Sulfide, Carbonoxysulfide   |
| Catechol   | 120-80-9   | 5                                   | Pyrocatechol, O-Dihydroxybenzene   |
| Chloramben   | 133-90-4   | 1                                   | 3-Amino-2,5-Dichlorobenzoic Acid, Amben, Amiben*, Vegiben* (*Trademark)              |
| Chlordane  | 57-74-9    | 0.01                                | ENT9932, Octachlor   |
| Chlorine   | 7782-50-5  | 0.1                                 | Bertholite   |
| Chloroacetic Acid  | 79-11-8    | 0.1                                 | Monochloroacetic Acid, Chloroethanoic Acid   |
| Chloroacetophenone, [2-]                                       | 532-27-4   | 0.06                                | Phenacyl Chloride, Chloromethyl Phenyl Ketone, Tear Gas, Mace                        |
| Chlorobenzilate  | 510-15-6   | 0.4                                 | Ethyl-4,4'-Dichlorobenzilate, Ethyl-4,4'-Dichlorophenyl Glycollate                   |
| Chloroform   | 67-66-3    | 0.9                                 | Trichloromethane   |
| Chloromethyl Methyl Ether                                      | 107-30-2   | 0.1                                 | CMME, Methyl Chloromethyl Ether, Chloromethoxymethane, Monochloromethyl Ether        |
| Chloroprene  | 126-99-8   | 1                                   | 2-Chloro-1,3-Butadiene, Chlorobutadiene, Neoprene Rubber Compound                    |
| Chromic Chloride   | 10025-73-7 | 0.1                                 |  |
| Chromium Compounds (except Hexavalent)                         |            | 5                                   | Chromium, Chromium(II) Compounds, Chromium (III) Compounds                           |
| Chromium Compounds, Hexavalent                                 |            | 0.002                               | Chromium (VI)  |
| Chrysene   | 218-01-9   | 0.01                                |  |
| Cobalt Carbonyl  | 12010-68-1 | 0.1                                 |  |
| Cobalt Metal (and compounds, except those specifically listed) |            | 0.1                                 | Cobalt (Bromide, Chloride, Diacetate, Formate, Nitrate, Oxide, Sulfamate)            |
| Coke Oven Emissions  | 8007-45-2  | 0.03                                | Coal Tar, Coal Tar Pitch, Coal Tar Distillate  |
| Cresol, [Meta-]  | 108-39-4   | 1                                   | 3-Cresol, M-Cresylic Acid, 1-Hydroxy-3-Methylbenzene, M-Hydroxytoluene               |
| Cresol, [Ortho-]   | 95-48-7    | 1                                   | 2-Cresol, O-Cresylic Acid, 1-Hydroxy-2-Methylbenzene, 2-Methylphenol                 |
| Cresol, [Para-]  | 106-44-5   | 1                                   | 4-Cresol, P-Cresylic Acid, 1-Hydroxy-4-Methylbenzene, 4-Hydroxytoluene               |
| Cresols/ Cresylic Acid (isomers and mixture)                   | 1319-77-3  | 1                                   |  |
| Cyanide Compounds (except those specifically listed)           | 20-09-7    | 5                                   | Cyanide (Barium, Chlorine, Free, Hydrogen, Potassium, Silver, Sodium, Zinc)          |
| DDE (p,p'-Dichlorodiphenyl Dichloroethylene                    | 72-55-9    | 0.01                                |  |
| Di(2-Ethylhexyl)Phthalate, (DEHP)                              | 117-81-7   | 5                                   | Bis(2-ethylhexyl)Phthalate, Di(2-Ethylhexyl)Phthalate, DOP, Di-Sec-Octyl Phthalate   |
| Diaminotoluene, [2,4-]   | 95-80-7    | 0.02                                | 2,4-Toluene Diamine, 3-Amino-Para-Toluidine, 5-Amino-Ortho-Toluidine                 |
| Diazomethane   | 334-88-3   | 1                                   | Azimethylene, Diazirine  |
| Dibenz(a,h)anthracene  | 53-70-3    |                                     |  |
| Dibenzofuran   | 132-64-9   | 5                                   | Diphenylene Oxide  |
| Dibenzopyrene, [1,2:7,8]                                       | 189-55-9   |                                     |  |

| Chemical                             | CAS#       | Emission Threshold Level (ton/year) | Synonyms  |
|--------------------------------------|------------|-------------------------------------|---|
| Dibromo-3-Chloropropane, [1,2-]      | 96-12-8    | 0.01                                | DBCP  |
| Dibromomethane, [1,2-]               | 106-93-4   | 0.1                                 | Ethylene Dibromide, Ethylene Bromide, Sym-Dibromoethane                       |
| Dichlorobenzene, [1,4-]              | 106-46-7   | 3                                   | 1,4-Dichloro-P-DCB, 1-4-DCB, PDB, PDCB  |
| Dichlorobenzidine, [3,3-]            | 91-94-1    | 0.2                                 | 4,4'-Diamino-3,3'-Dichlorobiphenyl, 3,3'-Dichlorobiphenyl-4,4'-Diamine, DCB   |
| Dichloroethane, [1,1-]               | 75-34-3    | 1                                   | Ethylidene Dichloride, 1,1-Ethylidene Dichloride, Asymmetrical Dichlorethane  |
| Dichloroethane, [1,2-]               | 107-06-2   | 0.8                                 | Ethylene Dichloride, Glycol Dichloride, Ethylene Chloride                     |
| Dichloroethylene, [1,1-]             | 75-35-4    | 0.4                                 | Vinylidene Chloride, DCE, VDC   |
| Dichloropropane, [1,2-]              | 78-87-5    | 1                                   | Propylene Dichloride  |
| Dichloropropene [1,3-]               | 542-75-6   | 1                                   | 1,3-Dichloropropylene, Alpha-Chlorallyl Chloride                              |
| Dichlorvos                           | 62-73-7    | 0.2                                 | DDVP, 2,2-Dichlorovinyl dimethylphosphate                                     |
| Diethanolamine                       | 11-42-2    | 5                                   | Bis(2-Hydroxyethyl)Amine, 2,2'-Dihydroxydiethylamine, Di(2-Hydroxyethyl)Amine |
| Diethyl Sulfate                      | 64-67-5    | 1                                   | Diethyl Ester Sulfuric Acid, Ethyl Sulfate                                    |
| Dimethoxybenzidine, [3,3-]           | 119-90-4   | 0.1                                 | Fast Blue B Base, Dianisidine, O-Dianisidine                                  |
| Dimethylbenz(a)anthracene, [7,12]    | 57-97-6    | 0.01                                |   |
| Dimethyl Benzidine, [3,3-]           | 119-93-7   | 0.008                               | O-Tolidine, Bianisidine, 4,4'-Diamino-3,3'-Dimethylbiphenyl, Diaminoditoyl    |
| Dimethyl Carbamoyl Chloride          | 79-44-7    | 0.02                                | DMCC, Chloroformic Acid Dimethyl Amide, Dimethyl Carbamyl Chloride            |
| Dimethyl Formamide                   | 68-12-2    | 1                                   | DMF, Formyldimethylamine  |
| Dimethyl Hydrazine, [1,1-]           | 57-14-7    | 0.008                               | Unsymmetrical Dimethylhydrazine, UDMH, Dimazine                               |
| Dimethyl Sulfate                     | 77-78-1    | 0.1                                 | Sulfuric Acid Dimethyl Ester, Methyl Sulfate                                  |
| Dimethylaminoazobenzene, [4-]        | 60-11-7    | 1                                   | N,N-Dimethyl-P-Phenylazo-Aniline, Benzeneazo Dimethylaniline                  |
| Dimethylaniline, [N,N-]              | 121-69-7   | 1                                   | N,N-Diethyl Aniline, N,N-Dimethylphenylamine, DMA                             |
| Dinitro-O-Cresol, [4,6-] and salts   | 534-52-1   | 0.1                                 | DNOC, 3,5-Dinitro-O-Cresol, 2-Methyl-4,6-Dinitrophenol                        |
| Dinitrophenol, [2,4-]                | 51-28-5    | 1                                   | DNP   |
| Dinitrotoluene, [2,4-]               | 121-14-2   | 0.02                                | Dinitrotoluol, DNT, 1-Methyl-2,4-Dinitrobenzene                               |
| Dioxane, [1,4-]                      | 123-91-1   | 6                                   | 1,4-Diethyleneoxide, Diethylene Ether, P-Dioxane                              |
| Diphenylhydrazine, [1,2-]            | 122-66-7   | 0.09                                | Hydrazobenzene, N,N'-Diphenylhydrazine, N,N'-Bianiline, 1,1'-Hydrodibenzene   |
| Diphenylmethane Diisocyanate, [4,4-] | 101-68-8   | 0.1                                 | Methylene Bis(Phenylisocyanate), Methylene Diphenyl Diisocyanate, MDI         |
| Epichlorohydrin                      | 106-89-8   | 2                                   | 1-Chloro-2,3-Epoxypropane, EPI, Chloropropylene Oxide, Chloromethyloxirane    |
| Ethyl Acrylate                       | 140-88-5   | 1                                   | Ethyl Propenoate, Acrylic Acid Ethyl Ester                                    |
| Ethylene Imine (Aziridine)           | 151-56-4   | 0.003                               | Azacyclopropane, Dimethyleneimine, Ethylenimine, Vinylamine, Azirane          |
| Ethylene Oxide                       | 75-21-8    | 0.1                                 | 1,2-Epoxyethane, Oxirane, Dimethylene Oxide, Anprolene                        |
| Ethylene Thiourea                    | 96-45-7    | 0.6                                 | 2-Imidazolidinethione, ETU  |
| Fluomine                             | 62207-76-5 | 0.1                                 |   |
| Formaldehyde                         | 50-00-0    | 2                                   | Oxymethylene, Formic Aldehyde, Methanal, Methylene Oxide, Oxomethane          |

| Chemical   | CAS#       | Emission Threshold Level (ton/year) | Synonyms   |
|--|------------|-------------------------------------|--|
| Glycol Ethers (except those specifically listed)           |            | 5                                   |  |
| Heptachlor   | 76-44-8    | 0.02                                | 1,4,5,6,7,8,8A-Heptachloro-3A,4,7,7A-Tetrahydro-4,7-Methanoindiene               |
| Hexachlorobenzene  | 118-74-1   | 0.01                                | Perchlorobenzene, HCB, Pentachlorophenyl Benzene, Phenyl Perchloryl              |
| Hexachlorobutadiene  | 87-68-3    | 0.9                                 | Perchlorobutadiene, 1,3-Hexachlorobutadiene, HCB                                 |
| Hexachlorocyclopentadiene                                  | 77-47-4    | 0.1                                 | HCCPD, HEX   |
| Hexachloroethane   | 67-72-1    | 5                                   | Perchloroethane, Carbon Hexachloride, HCE, 1,1,1,2,2,2-Hexachloroethane          |
| Hexamethylene Diisocyanate, 1,6-                           | 822-06-0   | 0.02                                | 1,6-Diisocyanatohexane, 1,6-Hexanediol Diisocyanate                              |
| Hexamethylphosphoramide                                    | 680-31-9   | 0.01                                | Hexamethylphosphoric Triamide, HEMPA, Hexametapol, Hexamethylphosphoramide       |
| Hydrazine  | 302-01-2   | 0.004                               | Methylhydrazine, Diamide, Diamine, Hydrazine Base                                |
| Hydrogen Fluoride  | 7664-39-3  | 0.1                                 | Hydrofluoric Acid Gas, Fluorhydric Acid Gas, Anhydrous Hydrofluoric Acid         |
| Hydrogen Selenide  | 7783-07-5  | 0.1                                 |  |
| Hydroquinone   | 123-31-9   | 1                                   | Quinol, Hydroquinol, P-Diphenol, 1,4-Benzenediol, Hydrochinone, Arctivin         |
| Indeno(1,2,3-cd)Pyrene                                     | 193-39-5   | 0.01                                |  |
| Lead and Compounds (except those specifically listed)      | 20-11-1    | 0.01                                | Lead (Acetate, Arsenate, Chloride, Fluoride, Iodide, Nitrate, Sulfate, Sulfide)  |
| Lindane [Gamma-Hexachlorocyclohexane]                      | 58-89-9    | 0.01                                | Benzene Hexachloride – Gamma Isomer  |
| Maleic Anhydride   | 108-31-6   | 1                                   | 2,5-Furanediene, Cis-Butenedioic Anhydride, Toxic Anhydride                      |
| Manganese and Compounds (except those specifically listed) | 20-12-2    | 0.8                                 | Manganese (Acetate, Chloride, Dioxide, (II)-Oxide, (III)-Oxide, (II)-Sulfate     |
| Mercury Compounds (except those specifically listed)       | 20-13-3    | 0.01                                | Mercury Compounds (Methyl-, Ethyl-, Phenyl-)                                     |
| Mercury Compounds (Inorganic)                              | 20-13-3    | 0.01                                | Mercury (Chloride, Cyanide, (I,II)-[Bromide, Iodide, Nitrate, Sulfate], Oxide)   |
| Methyl Hydrazine   | 60-34-4    | 0.06                                | Monomethylhydrazine, Hydrozomethane, 1-Methylhydrazine                           |
| Methyl Iodide  | 74-88-4    | 1                                   | Idomethane   |
| Methyl Isocyanate  | 624-83-9   | 0.1                                 | Isocyanatomethane, Isocyanic Acid, Methyl Ester                                  |
| Methylcyclopentadienyl Manganese                           | 12108-13-3 | 0.1                                 |  |
| Methylene Bis(2-Chloroaniline), [4,4-]                     | 101-14-4   | 0.2                                 | Curene, MOCA, 4,4'-Diamino-3,3'-Dichlorodiphenylmethane                          |
| Methylenedianiline, [4,4-]                                 | 101-77-9   | 1                                   | 4,4'-Diaminodiphenylmethane, DDM, MDA, Bis(4-Aminophenyl)Methane, DAPM           |
| Nickel Carbonyl  | 13463-39-3 | 0.1                                 |  |
| Nickel Compounds (except those specifically listed)        |            | 1                                   | Nickel (Acetate, Ammonium Sulfate, Chloride, Hydroxide, Nitrate, Oxide, Sulfate) |
| Nickel Refinery Dust                                       | 12035-72-2 | 0.08                                |  |
| Nickel Subsulfide  |            | 0.04                                |  |
| Nitrobenzene   | 98-95-3    | 1                                   | Nitrobenzoil, Oil of Mirbane, Oil of Bitter Almonds                              |
| Nitrobiphenyl, [4-]  | 92-93-3    | 1                                   | 4-Nitrodiphenyl, P-Nitrobiphenyl, P-Nitrophenyl, PNB                             |
| Nitrophenol, [4-]  | 100-02-7   | 5                                   | 4-Hydroxynitrobenzene, Para-Nitrophenol  |
| Nitropropane, [2-]   | 79-46-9    | 1                                   | Dimethylnitromethane, Sec-Nitropropane,  |

| Chemical   | CAS#      | Emission Threshold Level (ton/year) | Synonyms  |
|--|-----------|-------------------------------------|---|
|  |           |                                     | Isonitropropane, Nitroisopropane  |
| Nitroso-N-Methylurea, [N-]                                   | 684-93-5  | 0.0002                              | N-Methyl-N-Nitrosourea, N-Nitroso-N-Methylcarbamide                           |
| Nitrosodimethylamine, [N-]                                   | 62-75-9   | 0.001                               | Dimethylnitrosamine, DMN, DMNA  |
| Nitrosomorpholine, [N-]                                      | 59-89-2   | 1                                   | 4-Nitrosomorpholine   |
| Parathion  | 56-38-2   | 0.1                                 | DNTP, Monothiophosphate, Diethyl-P-Nitrophenyl                                |
| PCB (Polychlorinated Biphenyls)                              | 1336-36-3 | 0.009                               | Aroclors  |
| Pentachloronitrobenzene                                      | 82-68-8   | 0.3                                 | Quintobenzene, PCNB, Quiniozene   |
| Pentachlorophenol  | 87-86-5   | 0.7                                 | PCP, Pencilorol, Pentachlorophenate, 2,3,4,5,6-Pentachlorophenol              |
| Phenol   | 108-95-2  | 0.1                                 | Carbolic Acid, Phenic Acid, Phenylic Acid, Phenyl Hydrate, Hydroxybenzene     |
| Phenyl Mercuric Acetate                                      | 62-38-4   | 0.01                                | VII.  |
| Phosgene   | 75-44-5   | 0.1                                 | Carbonyl Chloride, Carbon Oxychloride, Carbonic Acid Dichloride               |
| Phosphine  | 7803-51-2 | 5                                   | Hydrogen Phosphide, Phosphoretted Hydrogen, Phosphorus Trihydride             |
| Phosphorous (Yellow or White)                                | 7723-14-0 | 0.1                                 |   |
| Phthalic Anhydride   | 85-44-9   | 5                                   | Phthalic Acid Anhydride, Benzene-O-Dicarboxylic Acid Anhydride, Phthalandione |
| Polycyclic Organic Matter (except those specifically listed) | TP15      | 0.01                                | POM, PAH, Polyaromatic Hydrocarbons,  |
| Potassium Cyanide  | 151508    | 0.1                                 |   |
| Propane Sultone, [1,3-]                                      | 1120-71-4 | 0.03                                | 1,2-Oxathiolane-2,2-Dioxide, 3-Hydroxy-1-Propanesulphonic Acid Sultone        |
| Propiolactone, [Beta-]                                       | 57-57-8   | 0.1                                 | 2-Oxeatanone, Propiolactone, BPL, 3-Hydroxy-B-Lactone-Propanoic Acid          |
| Propionaldehyde  | 123-38-6  | 5                                   | Propanal, Propyl Aldehyde, Propionic Aldehyde                                 |
| Propylene Oxide  | 75-56-9   | 5                                   | 1,2-Epoxypropane, Methylethylene Oxide, Methyl Oxirane, Propene Oxide         |
| Propyleneimine, [1,2-]                                       | 75-55-8   | 0.003                               | 2-Methyl Aziridine, 2-Methylazacyclopropane, Methylethyleneimine              |
| Quinoline  | 91-22-5   | 0.006                               | 1-Azanaphthalene, 1-Benzazine, Benzo(B)Pyridine, Chinoline, Leucoline         |
| Quinone  | 016-51-4  | 5                                   | Benzoquinone, Chinone, P-Benzoquinone, 1,4-Benzoquinone                       |
| Selenium and Compounds (except those specifically listed)    | 7782-49-2 | 0.1                                 | Selenium (Metal, Dioxide, Disulfide, Hexafluoride, Monosulfide)               |
| Sodium Cyanide   | 143339    | 0.1                                 |   |
| Sodium Selenate  | 13410010  | 0.1                                 |   |
| Sodium Selenite  | 101020188 | 0.1                                 |   |
| Styrene  | 100-42-5  | 1                                   | Cinnamene, Cinnamol, Phenethylene, Phenylethylene, Vinylbenzene               |
| Styrene Oxide  | 96-09-3   | 1                                   | Epoxyethylbenzene, Phenylethylene Oxide, Phenyl Oxirane, Epoxystyrene         |
| Tetrachlorodibenzo-P-Dioxin                                  | 1746-01-6 | 6.00E-07                            |   |
| Tetrachloroethane, [1,1,2,2-]                                | 79-34-5   | 0.3                                 | Sym-Tetachloroethane, Acetylene Tetrachloride, Ethane Tetrachloride           |
| Tetraethyl Lead  | 78-00-2   | 0.01                                |   |
| Tetramethyl Lead   | 75-74-1   | 0.01                                |   |

| <b>Chemical</b>              | <b>CAS#</b> | <b>Emission Threshold Level (ton/year)</b> | <b>Synonyms</b>  |
|------------------------------|-------------|--|--|
| Titanium Tetrachloride       | 7550-45-0   | 0.1  | Titanium Chloride  |
| Toluene Diisocyanate, [2,4-] | 584-84-9    | 0.1  | TDI, Tolyene Diisocyanate, Diisocyanatoluene                       |
| Toluidine, [Ortho-]          | 95-53-4     | 4  | Ortho-Aminotoluene, Ortho-Methylaniline, 1-Methyl-1,2-Aminobenzene |
| Toxaphene                    | 8001-35-2   | 0.01                                       | Chlorinated Camphene, Camphechlor, Polychlorcamphene               |
| Trichloroethane, [1,1,2-]    | 79-00-5     | 1  | Vinyl Trichloride, Beta-Trichloroethane                            |
| Trichlorophenol, [2,4,5-]    | 95-95-4     | 1  | 2,4,5-TCP  |
| Trichlorophenol, [2,4,6-]    | 88-06-2     | 6  | 2,4,6-TCP  |
| Trifluralin                  | 1582-09-8   | 9  | 2,6-Dinitro-N-N-Dipropyl-4-(Trifluoromethyl)Benzeneamine           |
| Trimethylpentane, [2,2,4-]   | 540-84-1    | 5  | Isobutyltrimethylethane, Isoctane                                  |
| Urethane [Ethyl Carbamate]   | 51-79-6     | 0.8  | Ethyl Urethane, O-Ethylurethane, Leucothane, NSC 746, Urethan      |
| Vinyl Acetate                | 108-05-4    | 1  | Acetic Acid Vinyl Ester, Vinyl Acetate Monomer, Ethenyl Ethanoate  |
| Vinyl Bromide                | 593-60-2    | 0.6  | Bromoethylene, Bromoethene   |
| Vinyl Chloride               | 75-01-4     | 0.2  | Chloroethylene, Chloroethene, Monochloroethylene                   |



## STATEMENT OF BASIS

### Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received January 7, 2011;
- 2) 2010 Emissions Inventory Questionnaire, received March 23, 2011; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit 032006-009, Issued March 13, 2006;
- 5) Amendment to Construction Permit 032006-009, Issued June 26, 2006;
- 6) Construction Permit 042005-002, Issued April 1, 2005;
- 7) Construction Permit 062005-003, Issued June 10, 2005;
- 8) Amendment to Construction Permit 062005-003, Issued December 9, 2005;
- 9) Construction Permit 072002-010, Issued June 18, 2002;
- 10) Amendment to Construction Permit 072002-010A, Issued May 31, 2005;
- 11) Construction Permit 052002-018, Issued April 19, 2002; and
- 12) Construction Permit 092010-010, Issued September 27, 2010.

### 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 the following requirements to not be applicable to this installation at this time for the reasons stated.

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

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

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

This rule no longer applies to the paint booths according to the exemption in 10 CSR 10-6.400(1)(B)14. Which exempt, "Coating operations equipped with a control system designed to control at least 95% of the particulate overspray..."

### Construction Permit Revisions

This installation does not currently have any construction permits that have undergone revisions. All construction permits that have been issued to the permittee and have special conditions have been incorporated by reference into this Title V Permit.

The Construction Permits 0195-025, 0499-008 and 092010-010 did not include any special conditions, therefore they are not incorporated by reference into this permit.

Since Construction Permit 072002-010A replaced Construction Permit 072002-010 and superceded all special conditions found in Construction Permit 052002-018, Construction Permits 072002-010 and 052002-018 are not incorporated by reference into this permit.

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

None.

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

40 CFR Part 63, Subpart P, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*

The requirements of this subpart do not apply to this installation since this installation is not a major source of emissions of HAPS.

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

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent are not covered under the provisions of this subpart.

Since cleaning is not performed with a machine but with rags to wipe down the molds during cleaning under a ventilated hood and halogenated solvents as defined in 40 CFR 63.460 are not used, the mold cleaning operation is not subject to the MACT standards for halogenated solvent cleaning.

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

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

### Compliance Assurance Monitoring (CAM) Applicability

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

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

### Updated Potential to Emit for the Installation

| Pollutant        | Potential to Emit (tons/yr) <sup>1</sup> |
|------------------|--|
| CO               | 0.71 <sup>4</sup>                        |
| CO <sub>2e</sub> | .47 <sup>4</sup>                         |
| HAP              | 14.5                                     |
| NO <sub>x</sub>  | 3.41 <sup>4</sup>                        |
| PM <sub>10</sub> | 15.0 <sup>2</sup>                        |
| PM <sub>25</sub> | 15.0 <sup>2</sup>                        |
| SO <sub>x</sub>  | N/A                                      |
| VOC              | 314.51 <sup>3</sup>                      |

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

<sup>2</sup>PM10 emissions are limited to 15 tons per year by Permit Condition 2

<sup>3</sup>VOC emissions were taken from the calculations used in Construction Permit 092010-010. No equipment has been added or removed since the issuance of this construction permit.

<sup>4</sup>The only sources of CO, CO<sub>2e</sub> and NO<sub>x</sub> are natural gas burning units with a total heat input capacity of 8.04 MMBtu/hr.

### Other Regulatory Determinations

10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*

In the previous operating permit (OP2001-042) the VOC limit for coating operations was 3.5 lbs. VOC/gallon coating (minus water and non-VOC organic compounds). The rule has since been amended and now includes a limitation specifically for polyurethane shoe sole manufacturing which is 6.7 lbs. VOC/gallon coating (minus water and non-VOC organic compounds). This new limit is listed in this operating permit in Permit Condition 6.

### Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

- 1) The specific pollutant regulated by that rule is not emitted by the installation;
- 2) The installation is not in the source category regulated by that rule;
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule;
- 4) The installation does not contain the type of emission unit which is regulated by that rule;
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine

and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

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Jill Wade, P.E.  
Environmental Engineer

CERTIFIED MAIL: 70093410000193532252  
RETURN RECEIPT REQUESTED

Mr. John Offord  
Meramec Group, Inc.  
338 Ramsey Street  
Sullivan, MO 63080

Re: Meramec Group, Inc., 071-0068  
Permit Number: **OP2012-038**

Dear Mr. Offord:

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

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

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

Sincerely,

**AIR POLLUTION CONTROL PROGRAM**

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

MJS:jwk

Enclosures

c: St. Louis Regional Office  
PAMS File: 2011-01-020

## MEMORANDUM

DATE: August 30, 2012

TO: John Offord – Meramec Group, Inc

FROM: Wade, Jill, Environmental Engineer

SUBJECT: Response to Public Comments

Comments were received during the public comment period from Mark Smith of the Environmental Protection Agency, Region 7. The comments are addressed in the order in which they appear within the letter(s).

**Comment #1:** The existing operating permit requires Meramec Group, Inc. to not discharge into the atmosphere any VOC from coating operations in excess of 3.5 lbs. VOC/gallon coating. The draft Part 70 operating permit on public notice for review requires Meramec Group, Inc. to not discharge into the atmosphere any VOC from coating operations in excess of 6.7 lbs. VOC/gallon coating. There is no explanation describing the justification for this apparent relaxation of a permit condition.

Also, 10 CSR 10-5.330 includes work practices that became effective on or after March 1, 2012. It appears as though these work practices are applicable to the Meramec Group, Inc. facility, yet they are not included in the permit.

EPA recommends MDNR provide an explanation in the record which allows for the emission limit increase from 3.5 to 6.7 lbs VOC/gallon and an explanation as to why the work practices are not applicable.

**Response to Comment:** 10 CSR 10-5.330, was amended in 2011 to include a specific VOC emission limit for polyurethane shoe sole manufacturing of 6.7 lbs. VOC/gallon coating. This limit can be found in the table for Plastic and Rubber Parts and Products Coating in paragraph (3)(J)2.B. of the rule. An explanation has been added to the Statement of Basis addressing the change in VOC limit from the previously issued operating permit. The work practices included in the rule which became effective March 1, 2012 have been added to the permit condition.

**Comment #2:** EPA suggests that MDNR should provide an explanation, in the Statement of Basis, as to the justification for allowing the “Chemist” to serve as the facility “Responsible

Official” when the title of “Chemist” does not appear anywhere in the allowance for the title of Responsible Official under 10 CSR 10-6.020.

**Response to Comment:** A response to this issue was received via email on August 17, 2012 from Rob Dieckhaus of Meramec Group, Inc. Mr. Dieckhaus holds the title of Industrial Products GM but he is also the co-owner and corporate officer of the company. In his email he describes John Offord as the Manager of Environmental Compliance and Product Testing and states that in his role as Manager of Environmental Compliance, he is a duly-authorized representative of the company with respect to environmental issues. I have changed the permit to include this updated title for Mr. Offord.

**Comment #3:** There is one special condition in an approved construction permit issued to this facility that does not appear in either a permit condition, or the Statement of Basis. Special Condition 4, of Construction Permit #072002-010A, issued May 31, 2005 is not included within the draft permit. Therefore, MDNR should address this special condition, either within a permit condition or the Statement of Basis.

**Response to Comment:** Special Condition 4 of Construction Permit 072002-010A was added to the operating permit as Permit Condition PW002.

JW/kjc