

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

**MISSOURI AIR CONSERVATION COMMISSION**

**PERMIT TO CONSTRUCT**

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

Permit Number: **08 2017 - 007** Project Number: 2017-05-090

Installation Number: 071-0068

Parent Company: Meramec Group, Inc.

Parent Company Address: 338 Ramsey St., Sullivan, MO 63080

Installation Name: Meramec Industries, Inc.

Installation Address: 338 Ramsey St., Sullivan, MO 63080

Location Information: Franklin County, S17, T40N, R2W

Application for Authority to Construct was made for:  
Table 23 foam molding and surface coating. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

  
Prepared by  
David Little, PE  
Environmental Engineer III  
New Source Review Unit

  
Director or Designee  
Department of Natural Resources

**AUG 28 2017**

Effective Date

**STANDARD CONDITIONS:**

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:

Missouri Department of Natural Resources  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102-0176  
(573) 751-4817

The regional office information can be found at the following website:  
<http://dnr.mo.gov/regions/>

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Meramec Industries, Inc.  
Franklin County, S17, T40N, R2W

1. **Superseding Condition**  
Special Condition 2 of this permit supersedes Special Condition 2 found in the previously issued permit, Permit 082014-012, issued by the Air Pollution Control Program.
2. **VOC Emission Limitation**
  - A. Meramec Industries, Inc. shall emit less than 100.0 tons of VOCs in any consecutive 12-month period from the entire installation as defined in Table 1.

**Table 1: VOC Emission Units**

Meramec Industries, Inc.	
Emission Point	Description
PROC01A	8 Molding lines – mold release
PROC01B	8 Molding lines – in-mold painting
PROC01C	8 Molding lines – blowing agent
PROC01D	8 Molding lines – foam production
PROC02A	Paint spray surface coating – monorail (Permit 052002-018)
PROC02B	Paint spray surface coating – hand spray booths (Permit 052002-018)
PROC02C	Paint spray surface coating – Loni process (Permit 042005-002)
PROC02D	Paint spray surface coating – automated paint (Permit 062005-003)
PROC03	Solvent mold cleaning
PROC04	Natural gas fired heaters
EP-29A	Table 25 – mold release
EP-29B	Table 25 – in-mold painting
EP-29C	Table 25 – blowing agent
EP-29D	Table 25 – foam production
EP-30A	Table 24 – mold release
EP-30B	Table 24 – in-mold painting
EP-30C	Table 24 – blowing agent
EP-30D	Table 24 – foam production
EP-31A	Table 18 – mold release
EP-31B	Table 18 – in-mold painting
EP-31C	Table 18 – blowing agent
EP-31D	Table 18 – foam production
EP-32A	Table 22 – mold release
EP-32B	Table 22 – in-mold painting
EP-32C	Table 22 – blowing agent
EP-32D	Table 22 – foam production
EP-33A	Table 23 – mold release
EP-33B	Table 23 – foam production

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

EP-33C	Table 23 – blowing agent
EP-33D	Table 23 – in-mold painting
Moldtech, Inc.	
Emission Point	Description
PROC05	Epoxy application (EP2 in Permit 052002-018)

B. Meramec Group, Inc. shall develop and use forms to demonstrate compliance with Special Condition 2.A. The forms shall contain at a minimum the following information,

- 1) Installation name
- 2) Installation ID
- 3) Permit number
- 4) Current month
- 5) Current 12-month date range
- 6) Emission units in Table 1
- 7) Emission unit's respective current monthly throughput
- 8) Emission unit's respective emission factors.
  - a. Mold release and blowing agents are 100% VOC.
  - b. Obtain surface coating, solvent, and epoxy VOC content from respective SDS, and verify VOC status according to 10 CSR 10-6.020 *Definitions and Common Reference Tables* (2)(V)13. If the SDS shows a weight % range, then use the highest value in the range.
  - c. The foam production VOC emission factor is 9.142E-10 lb VOC per lb isocyanate.
  - d. Natural gas VOC emission factor for PROC04 is 5.5 lb per MMCF of natural gas.
- 9) VOC emissions for each emission unit in the current month, calculated using the following equation:

*VOC emissions (tons)*

= *Respective material usage (lb, MMCF)*

× *Emission unit specific emission factor*  $\left( \frac{\text{lb VOC}}{\text{respective material usage (lb, MMCF)}} \right)$

×  $\left( \frac{1 \text{ ton VOC}}{2000 \text{ lbs VOC}} \right)$

- 10) Monthly emissions of VOC calculated by summing all VOC emissions from the emission units in Table 1
- 11) 12-month rolling total VOC emissions from the emission units in Table 1, and the sum of all VOC emissions from startup, shutdown, and malfunction as reported the Air Pollution Control Program's Compliance/Enforcement Section
- 12) Indication of compliance with Special Condition 2.A.

3. Capture Device Requirement – Table 23 Surface Coating (EU-33D)

A. Meramec Industries, Inc. shall capture emissions from the spray applied

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

- surface coating operation with a partially enclosed booth and exhaust fan(s).
- B. Negative pressure shall be demonstrated and recorded at all booth openings at least once every 24 hours using visual indication such as streamers, powder puff, smoke, or other method preapproved by the Air Pollution Control Program. All 24-hour periods when spray applied surface coating is non-operational shall be recorded.
  - C. Meramec Industries, Inc. shall operate the surface coating booth's exhaust fan(s) at all times surface coating is spray applied.
  - D. No more than one spray gun shall operate at one time.
  - E. Meramec Industries, Inc. shall maintain an operating and maintenance log for the filter which shall include the following:
    - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
    - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
    - 3) Dates of all above.
4. Control Device Requirement – Table 23 Surface Coating (EU-33D)
- A. Meramec Industries, Inc. shall control emissions from the spray applied surface coating operation using an exhaust filter.
  - B. The filter shall be operated and maintained in accordance with the manufacturer's specifications. The filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them.
  - C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). The replacement filter material type and weight shall meet or exceed the specifications of the existing filter. The air to cloth ratio or air to filter ratio shall not be increased when filter replacement is performed.
  - D. Meramec Industries, Inc. shall monitor and record the operating pressure drop across the filter at least once every 24 hours. All 24-hour periods when spray applied surface coating is non-operational shall be recorded. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

- E. Meramec Industries, Inc. shall maintain a copy of the filter manufacturer's performance warranty on site.
  - F. Meramec Industries, Inc. shall maintain an operating and maintenance log for the filter which shall include the following:
    - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
    - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
    - 3) Dates of all above.
5. **Operational Requirement – Raw Materials**  
Meramec Industries, Inc. shall keep all raw materials (mold release, resin, isocyanate, blowing agents, surface coating) in closed containers whenever the materials are not in use. Meramec Industries, Inc. shall provide and maintain suitable, easily read, permanent markings on all raw materials used with this equipment.
6. **Use of Alternative Material in Table 23 Surface Coating (EU-33D)**
  - A. Before using an alternative surface coating at Table 23 that differs from a material listed in the Application for Authority to Construct, Meramec Industries, Inc. shall calculate the potential emissions of all HAPs from using the alternative material.
  - B. Meramec Industries, Inc. shall seek approval from the Air Pollution Control Program New Source Review Unit before use of the alternative material if the potential individual HAP emissions for the alternative material are greater than the SMAL for any HAP listed in Appendix B, or if the potential combined HAP emissions for the alternative material are greater than or equal to 25.0 tons per year.
  - C. Attachment A or equivalent forms, such as electronic forms, preapproved by the Air Pollution Control Program shall be used to show compliance with Special Conditions 6.A and 6.B.
7. **Record Keeping and Reporting Requirements**
  - A. Meramec Industries, Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
  - B. Meramec Industries, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2017-05-090  
Installation ID Number: 071-0068  
Permit Number: 082017-007

Installation Address:

Meramec Industries, Inc.  
338 Ramsey St.  
Sullivan, MO 63080

Parent Company:

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

Franklin County, S17, T40N, R2W

REVIEW SUMMARY

- Meramec Industries, Inc. has applied for authority to install Table 23 foam molding and surface coating.
- MDI (CAS 101-68-8) HAP emissions are expected from the foam molding. All surface coatings evaluated for this project are HAP free.
- None of the NSPS under 40 CFR 60 apply to the proposed emission units. 40 CFR 60 Subpart FFF, *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing*, does not apply as the foam is not rotogravure printed.
- 40 CFR 60 Subpart RRR, *Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes*, does not apply. Butane diol (CAS 110-63-4) and ethylene glycol (CAS 107-21-1) are listed in §60.707, but are not a product, co-product, by-product, or intermediate.
- None of the NESHAPs under 40 CFR 61 apply to the proposed emission units.
- 40 CFR 63 Subpart OOOOO, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources*, applies to the proposed emission units and other processes at the installation. According to the SDS submitted with the project, the proposed emission units do not use a material containing methylene chloride. The MACT requires a methylene chloride compliance certification to be on file. The MACT does not require a startup, shutdown, malfunction plan; and does not require performance tests or continuous monitoring. Please refer to the MACT for complete requirements. EPA Region 7 has compliance authority at the time of this permit's issuance.
- 40 CFR 63 Subpart III, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production*; 40 CFR 63 Subpart PPPP, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*; and 40 CFR 63 Subpart MMMMM, *National Emission Standard for*

*Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations*, do not apply because the installation is not a major HAP source.

- 40 CFR 63 Subpart VVVVV, *National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources*; and 40 CFR 63 Subpart BBBB, *National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry*, do not apply to the installation. According to the resin and isocyanate SDS, the installation is the manufacturer of these materials. The installation purchases raw materials and combines them according to different recipes to generate resin blends. It does not manufacture, via a chemical reaction or process involving precursor reactants, any of the raw materials used in the blends. Also, the resin and isocyanate do not contain a MACT 6V Table 1 HAP or MACT 6B Target HAP.
- 40 CFR 63 Subpart HHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, does not apply to the proposed surface coating because the coatings do not contain target HAPs.
- A partially enclosed booth and exhaust filter are being used to control the PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the spray applied surface coating.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below respective de minimis levels. Potential emissions of VOC exceed the insignificant emission exemption level in 10 CSR 10-6.061(3)(A)3.A., thus requiring a permit.
- This installation is located in Franklin County with NAAQS status summarized below,
  - Ozone, 8-hour, 2008, currently marginal nonattainment
  - PM<sub>2.5</sub>, 1997, currently moderate nonattainment
  - Franklin County is an attainment area or unclassifiable for all other criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed for this review. Potential emissions of the project are below respective de minimis levels.
- Emissions testing is not required for the emission units.
- Submittal of an application to amend the intermediate operating permit is required within 90 days of equipment startup.
- Approval of this permit is recommended with special conditions

## INSTALLATION DESCRIPTION

Meramec Industries, Inc. manufactures molded polyurethane shoe soles and industrial plastic parts. Meramec Industries, Inc. and adjacent facility Moldtech Inc. are one installation for permitting applicability under Meramec Group, Inc. The installation is located in Sullivan, Franklin County, which is part of the St. Louis metropolitan area. Isocyanate prepolymer and polyurethane polyols are mixed and poured into molds that are pre-sprayed with a mold release compound and occasionally pre-sprayed with lacquer surface coating. After removal from the molds, the products are either directly shipped or spray coated with lacquer and then shipped. The installation was previously a major source of VOC for construction and operating permit applicability. Table 2 lists the New Source Review (construction) permits that have been issued to Meramec Industries, Inc. from the Air Pollution Control Program.

**Table 2: Permit History**

Permit Number	Description
0195-025	Installation of a shoe sole production line
0499-008	Installation of polyurethane shoe sole mold Line 12
052002-018	Installation of two paint lines and equipment for a molding process line
072002-010	Modification to existing molding lines to include the usage of n-pentane as a blowing agent; this permit was a combination of projects 2002-02-019, 2002-02-020.
042005-002	Modification to an existing painting operation
072002-010A	MHDR correction for sandblaster and abrasive cleaner
062005-003	Installation of a new automated finishing operation
062005-003A	Amended recordkeeping requirements
032006-009	New molding operation Table 25 (EP-29)
032006-009A	Amended MACT PPPP applicability
092010-010	Molding operation Table 24 (EP-30)
082013-008	Molding operation Table 18 (EP-31)
082014-012	Molding operation Table 22 (EP-32), installation-wide 100 tpy VOC limit

## PROJECT DESCRIPTION

Meramec Industries, Inc. proposes to install a flexible polyurethane foam manufacturing station, Table 23 (EP-33). Table 23 will manufacture one-piece floor mats. It will consist of spray applying mold release compound, then water-based paint. Isocyanate prepolymer and polyurethane polyols will be mixed with ■ blowing agent and injected into the mold. The part will cure before being removed, trimmed, and packaged. The molds will be cleaned with media blasting. Only one mat will be made at a time. Only one paint spray gun will be used at a time. The largest mold produces a ■ feet by ■ inches thick mat. Up to ■ mats can be made in one hour. Paint overspray emissions will be controlled with a partially enclosed-curtain booth and fiberglass arrestor pad. MHDR and emissions calculations are similar to Table 18 (EP-31) in permit 082013-008, and can be found there.

Meramec Industries, Inc. requested confidentiality for MHDR, recipes, and raw material names. Confidentiality was granted. This is the redacted public permit. A confidential

version is available to Meramec Industries, Inc. and program personnel under project 2017-05-073.

Table 3 provides an emissions summary for this project. Existing PM<sub>10</sub>, VOC, and HAP potential emissions were cited from permit 082014-012. PM and PM<sub>2.5</sub> were assumed equal to PM<sub>10</sub> emissions. ■ blowing agent in use, and the GHG (CO<sub>2</sub>e) are low, consistent with the GHG (CO<sub>2</sub>e) potential emissions for previous permits. Existing actual emissions were cited from the installation's 2016 EIQ. Potential emissions of the project represent the potential of the new molding and painting, assuming continuous operation (8,760 hours per year). The new installation conditioned potential represents a 100 tpy VOC limit. The limit makes the installation a minor VOC source. A previously indicated natural gas fired emergency engine does not exist onsite.

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory De Minimis Levels / SMAL	Existing Potential Emissions	Existing Actual Emissions (2016 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	15.69	N/A	0.13	15.82
PM <sub>10</sub>	15.0	15.69	0.86	0.13	15.82
PM <sub>2.5</sub>	10.0	15.69	0.83	0.13	15.82
SO <sub>2</sub>	40.0	0.02	8E-04	N/A	0.02
NOx	40.0	3.47	0.14	N/A	3.47
VOC	40.0	< 100.0	68.35	26.24	< 100.0
CO	100.0	2.91	0.03	N/A	2.91
GHG (CO <sub>2</sub> e)	N/A	<sup>1</sup> 5,089.79	N/A	453.33	<sup>1</sup> 5,543.12
GHG (mass)	N/A	<sup>1</sup> 4,194.85	N/A	18.13	<sup>1</sup> 4,212.98
HAPs	10.0 / 25.0	<sup>1</sup> 7.66	0.37	2.05E-07	<sup>1</sup> 7.66
MDI	0.1	N/D	N/A	2.05E-07	N/D

N/A = Not Applicable; N/D = Not Determined

<sup>1</sup> Does not include PTE from molding operations prior to permit 082013-008.

<sup>2</sup> HAPs only reported for PROC05. HAPs should be reported for the entire installation including foam molding and fuel combustion.

### APPLICABLE REQUIREMENTS

Meramec Industries, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Operating Permits*, 10 CSR 10-6.065

- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
  - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

#### SPECIFIC REQUIREMENTS

- 10 CSR 10-5.300, *Control of Emissions From Solvent Metal Cleaning*. The rule applies to all installations that emit VOC from solvent metal cleaning. Emission point PROC03 is cold solvent cleaning of molds with VOC emissions. The rule may apply to the installation, however no new solvent cleaning equipment is being installed under this construction permit. Operating permit OP2012-038 is silent about this rule's applicability.
- 10 CSR 10-5.455, *Control of Emissions From Industrial Solvent Cleaning Operations*. The rule may apply to the installation, however no new solvent cleaning equipment is being installed under this construction permit. The 2016 EIQ lists the only solvent cleaning (PROC03) as *cold solvent cleaning*, which is not subject to the provisions of 5.455. Operating permit OP2012-038 is silent about this rule's applicability.
- 10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*. The rule applies to the project. The VOC limit in section (3)(J)B. for *plastic and rubber parts and products coatings, plastic and rubber all other, general one component* is 2.3 lb VOC per gallon of coating. This limit was applied to the painting of foam mats and is a different limit than for shoe sole manufacturing. All of the coatings (in mold paint) evaluated for this project are under the limit.
- *MACT Regulations*, 10 CSR 10-6.075
  - *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources*, 40 CFR Part 63, Subpart OOOOOO

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 15, 2017, received May 25, 2017, designating Meramec Group, Inc. as the owner and operator of the installation.
- SDS received June 12, 2017.

The following documents are permit references:

- *MDI/Polymeric MDI Emissions Reporting Guidelines For the Polyurethane Industry*, Alliance For The Polyurethanes Industry, pages 78, 79, 100 of 136, 2004.
- *Transitioning to Low-GWP Alternatives in Building / Construction Foams*, U.S. EPA, February 2011. [www.epa.gov/ozone/downloads/EPA\\_HFC\\_ConstFoam.pdf](http://www.epa.gov/ozone/downloads/EPA_HFC_ConstFoam.pdf)
- IPCC Fourth Assessment Report: Climate Change 2007, Table 2.15, [http://www.ipcc.ch/publications\\_and\\_data/ar4/wg1/en/ch2s2-10-3-2.html](http://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-3-2.html)

## Attachment A – Table 23 (EP-33) Alternative Coating Compliance Worksheet

Meramec Industries, Inc.  
 Franklin County, S17, T40N, R2W  
 Project Number: 2017-05-090  
 Installation ID Number: 071-0068  
 Permit Number:

082017-007

Coating Name: \_\_\_\_\_ Date: \_\_\_\_\_ Copy this sheet as needed.

A	B	C	D	E	F	G
Individual HAP Name and CAS No.	HAP is also PM (yes / no)	Individual HAP Content (max weight %)	Maximum Application Rate (lbs coating per hour)	Overall PM Control Efficiency (%)	Individual HAP PTE (tons per year)	Individual HAP SMAL (tons per year)
<i>Example Benzene CAS 71-43-2</i>	<i>no</i>	<i>2.0%</i>	<i>1.587</i>	<i>N/A</i>	<i>0.14</i>	<i>2.0</i>
<i>Example Cobalt 2-Ethylhexanoate CAS 136-52-7</i>	<i>yes</i>	<i>0.5%</i>		<i>94.925%</i>	<i>0.0018</i>	<i>0.1</i>

- A. Record the all individual HAPs from this single coating MSDS.
- B. Compare the HAP to Appendix B for verification as particulate matter.
- C. Record the maximum weight percent of each HAP from the MSDS.
- D. The maximum application rate is  lbs of coating per hour. If the maximum application rate is exceeded, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.
- E. The overall PM control efficiency includes the HVLP transfer efficiency (65%), booth capture efficiency (95%), and exhaust filter control efficiency (90%):  $65\% + (1 - 65\%) \times 95\% \times 90\% = 94.925\%$
- F. Calculate the particulate matter HAP potential to emit:  $F = C \times D \times (1 - E) \times 8,760 / 2,000$ . Otherwise calculate the volatile HAP potential to emit:  $F = C \times D \times 8,760 / 2,000$ .
- G. Record the individual HAP SMAL from the most recent Appendix B, also available at <http://www.dnr.mo.gov/env/apcp/permits/constpmtguide.htm> as *Table of Hazardous Air Pollutants, Screening Model Action Levels and Risk Assessment Levels*. If the individual HAP potential to emit is greater than the SMAL or the combined HAP potential is 25.0 tpy or more, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.

## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....	percent	<b>Mgal</b> .....	1,000 gallons
<b>°F</b> .....	degrees Fahrenheit	<b>MW</b> .....	megawatt
<b>acfm</b> .....	actual cubic feet per minute	<b>MHDR</b> .....	maximum hourly design rate
<b>BACT</b> .....	Best Available Control Technology	<b>MMBtu</b> ....	Million British thermal units
<b>BMPs</b> .....	Best Management Practices	<b>MMCF</b> .....	million cubic feet
<b>Btu</b> .....	British thermal unit	<b>MSDS</b> .....	Material Safety Data Sheet
<b>CAM</b> .....	Compliance Assurance Monitoring	<b>NAAQS</b> ....	National Ambient Air Quality Standards
<b>CAS</b> .....	Chemical Abstracts Service	<b>NESHAPs</b>	National Emissions Standards for Hazardous Air Pollutants
<b>CEMS</b> .....	Continuous Emission Monitor System	<b>NO<sub>x</sub></b> .....	nitrogen oxides
<b>CFR</b> .....	Code of Federal Regulations	<b>NSPS</b> .....	New Source Performance Standards
<b>CO</b> .....	carbon monoxide	<b>NSR</b> .....	New Source Review
<b>CO<sub>2</sub></b> .....	carbon dioxide	<b>PM</b> .....	particulate matter
<b>CO<sub>2</sub>e</b> .....	carbon dioxide equivalent	<b>PM<sub>2.5</sub></b> .....	particulate matter less than 2.5 microns in aerodynamic diameter
<b>COMS</b> .....	Continuous Opacity Monitoring System	<b>PM<sub>10</sub></b> .....	particulate matter less than 10 microns in aerodynamic diameter
<b>CSR</b> .....	Code of State Regulations	<b>ppm</b> .....	parts per million
<b>dscf</b> .....	dry standard cubic feet	<b>PSD</b> .....	Prevention of Significant Deterioration
<b>EIQ</b> .....	Emission Inventory Questionnaire	<b>PTE</b> .....	potential to emit
<b>EP</b> .....	Emission Point	<b>RACT</b> .....	Reasonable Available Control Technology
<b>EPA</b> .....	Environmental Protection Agency	<b>RAL</b> .....	Risk Assessment Level
<b>EU</b> .....	Emission Unit	<b>SCC</b> .....	Source Classification Code
<b>fps</b> .....	feet per second	<b>scfm</b> .....	standard cubic feet per minute
<b>ft</b> .....	feet	<b>SDS</b> .....	Safety Data Sheet
<b>GACT</b> .....	Generally Available Control Technology	<b>SIC</b> .....	Standard Industrial Classification
<b>GHG</b> .....	Greenhouse Gas	<b>SIP</b> .....	State Implementation Plan
<b>gpm</b> .....	gallons per minute	<b>SMAL</b> .....	Screening Model Action Levels
<b>gr</b> .....	grains	<b>SO<sub>x</sub></b> .....	sulfur oxides
<b>GWP</b> .....	Global Warming Potential	<b>SO<sub>2</sub></b> .....	sulfur dioxide
<b>HAP</b> .....	Hazardous Air Pollutant	<b>tph</b> .....	tons per hour
<b>hr</b> .....	hour	<b>tpy</b> .....	tons per year
<b>hp</b> .....	horsepower	<b>VMT</b> .....	vehicle miles traveled
<b>lb</b> .....	pound	<b>VOC</b> .....	Volatile Organic Compound
<b>lbs/hr</b> .....	pounds per hour		
<b>MACT</b> .....	Maximum Achievable Control Technology		
<b>µg/m<sup>3</sup></b> .....	micrograms per cubic meter		
<b>m/s</b> .....	meters per second		

## Appendix B: Air Pollution Control Program

### Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CHLOROPRENE	126-99-8	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y
ACETOPHENONE	98-86-2	1		Y	N	CHROMIUM COMPOUNDS		5	L	N	Y
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CHRYSENE	218-01-9	0.01	V	Y	N
ACROLEIN	107-02-8	0.04		Y	N	COBALT COMPOUNDS		0.1	M	N	Y
ACRYLAMIDE	79-06-1	0.02		Y	N	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N
ACRYLIC ACID	79-10-7	0.6		Y	N	CRESOL, [META-]	108-39-4	1	B	Y	N
ACRYLONITRILE	107-13-1	0.3		Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N
AMINOBIIPHENYL, [4-]	92-67-1	1	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N
ANILINE	62-53-3	1		Y	N	CUMENE	98-82-8	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y
ANTIMONY COMPOUNDS		5	H	N	Y	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	DIAZOMETHANE	334-88-3	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	DIOXINS/FURANS		6E-07	D,V	Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	DIBENZOFURAN	132-64-9	5	V	Y	N
ASBESTOS	1332-21-4	0	A	N	Y	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N
BENZENE	71-43-2	2		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y
BENZIDINE	92-87-5	0.0003	V	Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DICHLOROMETHANE	75-09-2	10		N	N
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y
BERYLLIUM SALTS		2E-05	J	N	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
BROMOFORM	75-25-2	10		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
CAPROLACTAM (Delisted)	105-60-2					DIMETHYL PHTHALATE	131-11-3	10		Y	N
CAPTAN	133-06-2	10		Y	Y	DIMETHYL SULFATE	77-78-1	0.1		Y	N
CARBARYL	63-25-2	10	V	Y	Y	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
CARBON DISULFIDE	75-15-0	1		Y	N	DIMETHYLANILINE, [N-N]	121-69-7	1		Y	N
CARBON TETRACHLORIDE	56-23-5	1		Y	N	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
CARBONYL SULFIDE	463-58-1	5		Y	N	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
CATECHOL	120-80-9	5		Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
CHLORAMBEN	133-90-4	1		Y	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
CHLORDANE	57-74-9	0.01		Y	Y	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
CHLORINE	7782-50-5	0.1		N	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
CHLOROACETIC ACID	79-11-8	0.1		Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
CHLOROBENZENE	108-90-7	10		Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	ETHYL ACRYLATE	140-88-5	1		Y	N



## Appendix B: Air Pollution Control Program Table of Hazardous Air Pollutants and Screening Model Action Levels

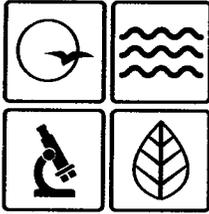
Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
CHLOROFORM	67-66-3	0.9		Y	N	ETHYL BENZENE	100-41-4	10		Y	N
ETHYL CHLORIDE	75-00-3	10		Y	N	NITROBENZENE	98-95-3	1		Y	N
ETHYLENE GLYCOL	107-21-1	10		Y	N	NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N
ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2					NITROPHENOL, [4-]	100-02-7	5		Y	N
ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N	NITROPROPANE, [2-]	79-46-9	1		Y	N
ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N
ETHYLENE OXIDE	75-21-8	0.1		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N
ETHYLENE THIOUREA	96-45-7	0.6		Y	Y	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N
FORMALDEHYDE	50-00-0	2		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N
GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N	PARATHION	56-38-2	0.1		Y	Y
GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y
HEPTACHLOR	76-44-8	0.02		Y	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N
HEXACHLORO BENZENE	118-74-1	0.01		Y	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N
HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N	PHENOL	108-95-2	0.1		Y	N
HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N
HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N	PHOSGENE	75-44-5	0.1		Y	N
HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N	PHOSPHINE	7803-51-2	5		N	N
HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	PHTHALIC ANHYDRIDE	85-44-9	5		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	POLYCYCLIC ORGANIC MATTER		0.01	V	Y	N
HEXAMETHYLENE,-1,6-DIISOCYANATE	822-06-0	0.02		Y	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PROPIONALDEHYDE	123-38-6	5		Y	N
HYDRAZINE	302-01-2	0.004		N	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PROPYLENE OXIDE	75-56-9	5		Y	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N
HYDROQUINONE	123-31-9	1		Y	N	QUINOLINE	91-22-5	0.006		Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	QUINONE	106-51-4	5		Y	N
ISOPHORONE	78-59-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y
LEAD COMPOUNDS		0.01	Q	N	Y	SELENIUM COMPOUNDS		0.1	W	N	Y
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	STYRENE	100-42-5	1		Y	N
MALEIC ANHYDRIDE	108-31-6	1		Y	N	STYRENE OXIDE	96-09-3	1		Y	N
MANGANESE COMPOUNDS		0.8	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y
MERCURY COMPOUNDS		0.01	S	N	N	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N
METHANOL	67-56-1	10		Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N
METHOXYCHLOR	72-43-5	10	V	Y	Y	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	TOLUENE	108-88-3	10		Y	N
METHYL CHLORIDE	74-87-3	10		Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N
METHYL ETHYL KETONE (Delisted)	78-93-3					TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N
METHYL HYDRAZINE	60-34-4	0.06		Y	N	TOXAPHENE	8001-35-2	0.01		Y	N
METHYL IODIDE	74-88-4	1		Y	N	TRICHLORO BENZENE, [1,2,4-]	120-82-1	10		Y	N
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N
METHYL ISOCYANATE	624-83-9	0.1		Y	N	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N
METHYL METHACRYLATE	80-62-6	10		Y	N	TRICHLOROETHYLENE	79-01-6	10		Y	N
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TRIETHYLAMINE	121-44-8	10		Y	N
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TRIFLURALIN	1582-09-8	9		Y	Y
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
MINERAL FIBERS		0	T	N	Y	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
NAPHTHALENE	91-20-3	10	V	Y	N	VINYL ACETATE	108-05-4	1		Y	N
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	VINYL CHLORIDE	75-01-4	0.2		Y	N
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	XYLENE, [META-]	108-38-3	10	G	Y	N
NICKEL COMPOUNDS		1	U	N	Y	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N



## Appendix B: Air Pollution Control Program Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
NICKEL REFINERY DUST		0.08	U	N	Y						
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y						

Legend	
Group ID	
A	Asbestos
B	Cresols/Cresylic Acid (isomers and mixtures)
C	2,4 - D, Salts and Esters
D	Dibenzofurans, Dibenzodioxins
E	4, 6 Dinitro-o-cresol, and Salts
F	Lindane (all isomers)
G	Xylenes (all isomers and mixtures)
H	Antimony Compounds
I	Arsenic Compounds
J	Beryllium Compounds
K	Cadmium Compounds
L	Chromium Compounds
M	Cobalt Compounds
N	Coke Oven Emissions
O	Cyanide Compounds
P	Glycol Ethers
Q	Lead Compounds (except elemental Lead)
R	Manganese Compounds
S	Mercury Compounds
T	Fine Mineral Fibers
U	Nickel Compounds
V	Polycyclic Organic Matter
W	Selenium Compounds
X	Polychlorinated Biphenyls (Aroclors)
Y	Radionuclides
Notes	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million



**Missouri Department of** dnr.mo.gov

# **NATURAL RESOURCES**

Eric R. Greitens, Governor

Carol S. Comer, Director

**AUG 28 2017**

Mr. Duane Kiewitt  
EHS Manager  
Meramec Industries, Inc.  
338 Ramsey St.  
Sullivan, MO 63080

RE: New Source Review Permit - Project Number: 2017-05-090

Dear Mr. Kiewitt:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).



Recycled paper

Mr. Duane Kiewitt  
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If you have any questions regarding this permit, please do not hesitate to contact David Little, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Susan Heckenkamp  
New Source Review Unit Chief

SH:dlj

Enclosures

c: St. Louis Regional Office  
PAMS File: 2017-05-090

Permit Number: 08 2017 - 007