

STATE OF 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: 07 2 0 0 9 - 0 0 6 Project Number: 2008-06-002

Parent Company: Nike Inc.

Parent Company Address: One Bowerman Drive, Portland, OR 97005

Installation Name: Nike IHM, Inc.

Installation Address: 8 Research Park Drive, Saint Charles, MO 63304

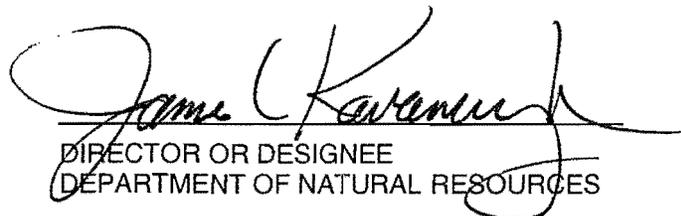
Location Information: Saint Charles County, S33, 34, T48N, R3E

Application for Authority to Construct was made for:
 Addition of a "Pyro-Clean" Tool Cleaning System. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

JUL - 7 2009

EFFECTIVE DATE


 DIRECTOR OR DESIGNEE
 DEPARTMENT OF NATURAL RESOURCES

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 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 departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources 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 this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' 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 at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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Permit No.	
Project No.	2008-06-002

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."

Nike IHM, Inc.

Saint Charles County, S33, 34, T48N, R3E

1. NIKE IHM, Inc. shall use these two pyro-clean units exclusively to remove nonchlorinated plastics from tools/metal parts.
2. NIKE IHM, Inc. shall use two Electri-Cat Oxidizers, one on each pyro-clean unit, to control emissions from them. Each of the two afterburners shall operate between 1,300 to 1,500 degrees Fahrenheit with more than a one-half ($\frac{1}{2}$) second residence time to assure a minimum combustion efficiency of 99.9%.
3. The pyro-clean units shall each be equipped with an electronic controller, with digital readout, which is able to monitor and display the temperature in the second combustion chamber to an accuracy of plus or minus two percent (2%).
4. The pyro-clean units shall have opacity of less than ten percent (10%) at all times. Opacity shall be determined by Method 9 compliance testing.

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

Project Number: 2008-06-002
Installation ID Number: 183-5015
Permit Number:

Nike IHM, Inc.
8 Research Park Drive
Saint Charles, MO 63304

Complete: June 2, 2008

Reviewed: June 4, 2008

Parent Company:
Nike Inc.
One Bowerman Drive
Portland, OR 97005

Saint Charles County, S33, 34, T48N, R3E

REVIEW SUMMARY

- Nike IHM, Inc. has applied for authority to install two "Pyro-Clean" Tool Cleaning Systems.
- Hazardous air pollutant (HAP) emissions are expected from the proposed equipment in insignificant amounts. These HAPs include acetaldehyde and acetone.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Two Electri-Cat Oxidizers are being used to control emissions from the equipment in this permit, one for each Pyro-Clean system.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The pyro-clean system in this permit is classified as an incinerator. All incinerators are required to obtain a permit from the Air Pollution Control Program as mandated in 10 CSR 10-6.060. Potential emissions are less than de minimis levels.
- This installation is located in St. Charles County, a nonattainment area for ozone (O₃) and an attainment area for all other criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- A revision to Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

NIKE IHM, Inc., located in St. Charles County, manufactures extruded plastic products. This installation submitted a basic operating permit application on June 13, 2002 and renewal applications on September 29, 2006 and May 10, 2007. The following construction permits have been issued to NIKE IHM, Inc. from the Air Pollution Control Program.

Permit Number	Description
052002-008	Installation of a heat cleaning oven
092004-018	Installation of a Steelman Heat Cleaning Oven.
122005-011	Installation of industrial dry filter spray paint booth.
022007-002	Installation of a parts cleaning system.

PROJECT DESCRIPTION

NIKE IHM, Inc. proposes to install two "Pyro-Clean" Tool Cleaning Systems. These units will be used to clean small tools and parts used during the plastic extrusion process. Since the plastics from tools and metal parts are burned off, these Pyro-Clean units are classified as incinerators. Therefore, a construction permit is required for these units according to 10CSR 10-6.060(1)(B).

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the factory testing data provided by the applicant. Each of the two Pyro-Clean units will have its own Electri-Cat Oxidizer, for a total of two Electri-Cat Oxidizers, one on each of the two Pyro-Clean units. The existing actual emissions were obtained from the 2007 Emissions Inventory Questionnaire (EIQ). Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2007 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/D	N/A	0.008	0.012
SO _x	40.0	N/D	N/A	N/A	N/A
NO _x	40.0	N/D	N/A	N/A	N/A
VOC	40.0	N/D	0.14	0.044	0.066
CO	100.0	N/D	N/A	0.0050	0.0075
HAPs	10.0/25.0	N/D	N/A	N/A	N/A

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

APPLICABLE REQUIREMENTS

Nike IHM, 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

- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *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 10-3.090

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*, I recommend this permit be granted with special conditions.

Jeannie Kozak
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 7, 2008, received for correction on June 2, 2008, designating Nike Inc. as the owner and operator of the installation.
- Manufacturers' test report provided by the applicant.
- Saint Louis Regional Office Site Survey, dated February 6, 2008.

Mr. Ron Weiss
General Manager
Nike IHM, Inc.
8 Research Park Drive
Saint Charles, MO 63304

RE: New Source Review Permit Correction- Project Number: 2008-06-002

Dear Mr. Weiss:

Enclosed with this letter is your permit to construct. Please study it carefully, as it has been corrected to reflect the installation of *two* Pyro-Clean Tool Cleaning Systems. This permit will supercede the previous one issued under project number 2008-06-002. Also, note the special conditions, if any, 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.

If you have any questions regarding this permit, please do not hesitate to contact Jeannie Kozak at the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:jkl

Enclosures

c: St. Louis Regional Office
PAMS File: 2008-06-002

Permit Number: