

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

JUL 12 2007

Mr. Jimmy McAfee, Director of Process Improvement and Quality
O'Sullivan Industries, Inc.
1900 Gulf Street
Lamar, MO, 64759

Re: O'Sullivan Industries, Inc., 011-0003
Permit Number: **OP2007-033**

Dear Mr. McAfee:

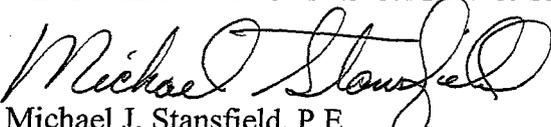
Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations, cited in this document, is necessary for continued compliance. It is very important you read and understand the requirements 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 643.075.6 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 contact Jill Wade at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or telephone (573) 751-4817. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS: jwk

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII
Southwest Regional Office
PAMS File: 2005-08-009





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 here in.

Operating Permit Number: OP2007-033
Expiration Date: JUL 11 2012
Installation ID: 011-0003
Project Number: 2005-08-009

Installation Name and Address

O'Sullivan Industries, Inc.
1900 Gulf Street
Lamar, MO 64759
Barton County

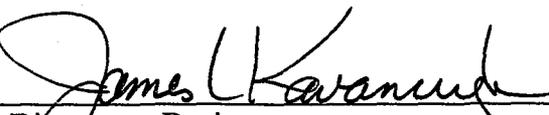
Parent Company's Name and Address

O'Sullivan Industries Holdings, Inc.
1900 Gulf Street
Lamar, MO 64759

Installation Description:

O'Sullivan Industries, Incorporated manufactures ready-to-assemble home/office furniture. Products include entertainment centers, bookcases, microwave oven carts, etc. The facility receives raw materials such as particle board, fiberboard, laminating paper, plastic edge banding, hot melt pellet and water-based adhesives, and solvent-based stains. Furniture is made in processes such as sawing, sanding, drilling, laminating, routing, edge finishing, hot-stamping and spray coating. Finished products are packaged at the facility.

JUL 12 2007
Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

O'Sullivan Industries, Incorporated manufactures ready-to-assemble home/office furniture. Products include entertainment centers, bookcases, microwave oven carts, etc. The facility receives raw materials such as particle board, fiberboard, laminating paper, plastic edge banding, hot melt pellet and water-based adhesives, and solvent-based stains. Furniture is made in processes such as sawing, sanding, drilling, laminating, routing, edge finishing, hot-stamping and spray coating. Finished products are packaged at the facility.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.50	0.01	1.79	1.58	1.50	0.0	0.0
2004	0.52	0.01	1.63	1.58	1.37	0.0	0.0
2003	0.54	0.01	1.84	1.06	1.55	0.0	0.0
2002	1.08	0.01	1.83	5.01	1.54	0.0	0.0
2001	6.85	0.01	1.50	14.10	1.30	0.0	0.01

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	One Giben 8" Saw / Giben 19
EU0011	One Prismatic Saw / Giben 301SPT, 699.95.380
EU0012	One Giben 8" Saw / Giben 17
EU0013	One Anthon 8" Saw / Anthon LNC
EU0014	Two Saws / Holzma HCL213816
EU0015	One Saw / Holzma HCL 213816
EU0016	One Giben SP2000 Saw
EU0017	One Giben SPT2000 Saw
EU0018	One Giben SPT2000 Saw
EU0019	One SPT-type saw
EU0020	One Anthon 6" Saw / LNB 150
EU0021	One IMC Saw / SRD-60
EU0022	One Rodgers Saw / 707 HUVE
EU0023	Two Saws / Simplex Whirlwind, 15538771, 15/839
EU0024	Two Saws / Simplex Whirlwind, 617659L, 54259683R
EU0025	One Laboratory Table Saw / 113.226680
EU0026	One Splitting Table Saw / SCMI S115
EU0027	One Splitting Table Saw / SCMI S115
EU0028	One Mafell Saw / KS350
EU0029	One saw / Simplex Whirlwind, 130755
EU0030	Two Single Side Soft Formers / Homag M47082
EU0031	One Double Side Soft Former / Homag M47243
EU0032	One Splitting Table Saw, Model 6Y934B, S.N. 9912

Emission Unit #	Description of Emission Unit
EU0033	Two Stripline Saws / Schelling, 154-085AS & 154-086AS
EU0034	One (Edge Banding Dept.) Cut-Off Saw / Anthon, S.N. 01470466006
EU0035	One (Final Assembly Dept.) Miter Saw / Brevetti, B84, S.N. 198
EU0040	Single Side Edgebanding Line – East / Homag
EU0041	Single Side Edgebanding Line – West / Homag FKL77A
EU0050	Cross Cut/End Cap Line / IMA PVQ1037
EU0060	Combi-forming Line – North / IMA KIR75V975VVR3
EU0061	Combi-forming Line – South / IMA KIR75V975VVR3
EU0062	One Combi-Forming Line (West), Sawing / IMA, S.N. 15034
EU0070	Foiling Line – South / Fletcher FM200D
EU0071	Foiling Line – East / Fletcher FM200D
EU0072	Foiling Line – West / Fletcher FM200D
EU0080	Band and Bore Line 1 / Homag, Biesse
EU0081	Band and Bore Line 2 / Homag, Biesse
EU0082	Band and Bore Line 3 / Homag, Biesse
EU0083	Band and Bore Line 4 / Homag, Biesse
EU0084	Band and Bore Line 5A / Homag, Biesse
EU0085	Band and Bore Line 5B / Homag, Biesse
EU0086	Band and Bore Line 6 / Homag, Biesse
EU0087	Band and Bore Line 7 / Homag, Biesse
EU0088	Band and Bore Line 8 / Homag, Biesse
EU0092	Saw/Tenoning Line / IMA, PSA II 260, S.N. 52/237
EU0101	One Shoda Router / NC516P
EU0102	One Heian Router / ZR442P
EU0103	One Pin Router / SCMI R9
EU0104	One Router / C.M.S. NC-PF6B8TCS, S.N. 2473
EU0108	One BAZ Machine Center (sawing) / Homag, S.N. 0-201-08-2964
EU0109	Two BAZ Machine Centers (sawing) / Homag, S.N. 0-201-08-4152 & 0-201-08-XXXX
EU0110	Two BAZ Machine Centers / Homag-Baz 2070162K
EU0111	One Weeke Machine Center / Optimat BP155
EU0112	One Biesse Machine Center / Biesse Rover 366
EU0120	Rip/Mould Line, Moulder #141041500, Weinig U17A
EU0121	Rip/Mould Line, Moulder #141005500, Weinig U23
EU0122	Rip/Mould Line, Moulder #141004300, Weinig U23
EU0130	One Sander / Time Saver 364 2 HD
EU0140	Sample Shop Equipment / Altendorf F-90
EU0148	Two (Final Assembly Dept.) Boring Machines / Biesse Techno Logic, S.N. 633931996 & 94-0570
EU0149	Two (Final Assembly Dept.) Boring Machines / Biesse Techno Logic, S.N. 94-0550 & 63381
EU0150	One (Edgeband Dept.) Boring Machine / Biesse Techno
EU0151	Two (Final Assembly Dept.) Boring Machines / Biesse Techno Logic, S.N. 89P0141387 & 94-0570
EU0154	One (Wood Shop Dept.) Boring Machine / Biesse Techno
EU0155	Two (Wood Shop Dept.) Boring Machines / Biesse Techno
EU0156	One (Wood Shop Dept.) Boring Machine / Biesse Techno
EU0157	Two (Wood Shop Dept.) Boring Machines / Biesse Techno

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0158	Two (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill, S.N. 21143 & 21144
EU0159	Four (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill, S.N. 20895, 20896, 20893, 20894
EU0160	One (Final Assembly Dept.) Cemco Drill / Nottmeyer SP N1
EU0161	One (Final Assembly Dept.) Cemco Drill / Nottmeyer SP N1
EU0162	Six (Final Assembly Dept.) Air Drills / Cemco VB-1009 and VB-653
EU0163	One (Edgeband Dept.) Air Drill / O'Sullivan, S.N 01470369000
EU0164	One (Edgeband Dept.) Type III Bore Line / O'Sullivan
EU0165	One (Edgeband Dept.) Type III Bore Line / O'Sullivan
EU0166	Two (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill, S.N. 20891, 20892
EU0167	Two (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill, S.N. 20889, 20890
EU0168	One Strip Line Double-Sided Edgebander
EU0170	One Automac Groover
EU0180	One Hauncher / Pistorius
EU0190	One Beveler / Stefani BRT
EU0191	One Beveler / Stefani BRT
EU0200	Door Fabrication Line / Brevetti B-84
EU0201	Door Fabrication Line / Brevetti C-16
EU0210	Paint Booth 4A
EU0220	Paint Booth 4B
EU0230	Paint Booth 6
EU0240	Paint Booth 10
EU0250	Edge Banding Process
EU0260	Forklift Repair Area Parts Washer
EU0270	Linear Groover
EU0280	Harlan Laminator
EU0290	20 Inkjet Printers
EU0300	Sawdust Handling Operations

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Berg and Friz Wrapper Hoods
Miscellaneous Isopropyl Alcohol Usage (Fugitive Emissions)
Pumphouse Natural Gas Fired Boiler
300 Gallon Gasoline Storage Tank
200 Gallon Diesel Fuel Storage Tank
500 Gallon Resin Storage Tank
1000 Gallon Diesel Fuel Storage Tank
Natural Gas Fired Space Heaters
Diesel Powered Firepump Engine
Standby Diesel Generator
Tool Room Hood

Hymmen Laminator
Retech Grinder

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Permit to Construct 0993-005, issued by the Missouri Department of Natural Resources on September 17, 1993.
- 2) Permit to Construct 0195-015, issued by the Missouri Department of Natural Resources on October 15, 1995.
- 3) Permit to Construct 102000-031, issued by the Missouri Department of Natural Resources on October 17, 2000.
- 4) Permit to Construct 072002-018, issued by the Missouri Department of Natural Resources on July 28, 2002.

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.

None.

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.

EU0010 through EU0201 – WOOD WORKING EQUIPMENT		
Emission Unit	Description / Manufacturer, Model No.	Date Installed
EU0010	One Giben 8" Saw / Giben 19	1999
EU0011	One Prismatic Saw / Giben 301SPT, 699.95.380	2001
EU0012	One Giben 8" Saw / Giben 17	1995
EU0013	One Anthon 8" Saw / Anthon LNC	1997
EU0014	Two Saws / Holzma HCL213816	1993
EU0015	One Saw / Holzma HCL 213816	1993
EU0016	One Giben SP2000 Saw	1988
EU0017	One Giben SPT2000 Saw	1991
EU0018	One Giben SPT2000 Saw	1999
EU0020	One Anthon 6" Saw / LNB 150	1997
EU0021	One IMC Saw / SRD-60	1983
EU0022	One Rodgers Saw / 707 HUVE	1983
EU0023	Two Saws / Simplex Whirlwind, 15538771, 15/839	2000
EU0024	Two Saws / Simplex Whirlwind, 617659L, 54259683R	2001
EU0025	One Laboratory Table Saw / 113.226680	1983
EU0026	One Splitting Table Saw / SCMI S115	1985
EU0027	One Splitting Table Saw / SCMI S115	1993
EU0028	One Mafell Saw / KS350	1983
EU0029	One saw / Simplex Whirlwind, 130755	2001
EU0031	One Double Side Soft Former / Homag M47243	1995
EU0032	One Splitting Table Saw, Model 6Y934B, S.N. 9912	2001
EU0033	Two Stripline Saws / Schelling, 154-085AS & 154-086AS	2001
EU0035	One (Final Assembly Dept.) Miter Saw / Brevetti, B84, S.N. 198	2001
EU0040	Single Side Edgebanding Line – East / Homag	1992
EU0041	Single Side Edgebanding Line – West / Homag FKL77A	1998
EU0050	Cross Cut/End Cap Line / IMA PVQ1037	1998
EU0060	Combi-forming Line – North / IMA KIR75V975VVR3	1997
EU0061	Combi-forming Line – South / IMA KIR75V975VVR3	1996
EU0062	One Combi-Forming Line (West), Sawing / IMA, S.N. 15034	2001
EU0070	Foiling Line – South / Fletcher FM200D	1997
EU0071	Foiling Line – East / Fletcher FM200D	1990
EU0072	Foiling Line – West / Fletcher FM200D	1992
EU0080	Band and Bore Line 1 / Homag, Biesse	1993
EU0081	Band and Bore Line 2 / Homag, Biesse	1993
EU0082	Band and Bore Line 3 / Homag, Biesse	1990
EU0083	Band and Bore Line 4 / Homag, Biesse	1984
EU0084	Band and Bore Line 5A / Homag, Biesse	1986

EU0085	Band and Bore Line 5B / Homag, Biesse	1986
EU0086	Band and Bore Line 6 / Homag, Biesse	1987
EU0087	Band and Bore Line 7 / Homag, Biesse	1991
EU0088	Band and Bore Line 8 / Homag, Biesse	1987
EU0092	Saw/Tenoning Line / IMA, PSA II 260, S.N. 52/237	2001
EU0101	One Shoda Router / NC516P	1988
EU0102	One Heian Router / ZR442P	1996
EU0103	One Pin Router / SCMI R9	1983
EU0104	One Router / C.M.S. NC-PF6B8TCS, S.N. 2473	2001
EU0108	One BAZ Machine Center (sawing) / Homag, S.N. 0-201-08-2964	2001
EU0109	Two BAZ Machine Centers (sawing) / Homag, S.N. 0-201-08-4152 & 0-201-08-XXXX	2000
EU0110	Two BAZ Machine Centers / Homag-Baz 2070162K	1998
EU0111	One Weeke Machine Center / Optimat BP155	1998
EU0112	One Biesse Machine Center / Biesse Rover 366	1997
EU0120	Rip/Mould Line, Moulder #141041500, Weinig U17A	1983
EU0121	Rip/Mould Line, Moulder #141005500, Weinig U23	1993
EU0122	Rip/Mould Line, Moulder #141004300, Weinig U23	1997
EU0130	One Sander / Time Saver 364 2 HD	1994
EU0140	Sample Shop Equipment / Altendorf F-90	1983
EU0148	Two (Final Assembly Dept.) Boring Machines / Biesse Techno Logic, S.N. 633931996 & 94-0570	2001
EU0149	Two (Final Assembly Dept.) Boring Machine / Biesse Techno Logic, S.N. 94-0550 & 63381	2001
EU0150	One (Edgeband Dept.) Boring Machine / Biesse Techno	1987
EU0151	Two (Final Assembly Dept.) Boring Machines / Biesse Techno Logic, S.N. 89P0141387 & 94-0570	2001
EU0154	One (Wood Shop Dept.) Boring Machine / Biesse Techno	1987
EU0155	Two (Wood Shop Dept.) Boring Machines / Biesse Techno	1989
EU0156	One (Wood Shop Dept.) Boring Machine / Biesse Techno	1990
EU0157	Two (Wood Shop Dept.) Boring Machines / Biesse Techno	1996
EU0160	One (Final Assembly Dept.) Cemco Drill / Nottmeyer SP N1	1983
EU0161	One (Final Assembly Dept.) Cemco Drill / Nottmeyer SP N1	1985
EU0162	Six (Final Assembly Dept.) Air Drills / Cemco VB-1009 and VB-653	1983
EU0163	One (Edgeband Dept.) Air Drill / O'Sullivan, S.N 01470369000	2001
EU0164	One (Edgeband Dept.) Type III Bore Line / O'Sullivan	1997
EU0165	One (Edgeband Dept.) Type III Bore Line / O'Sullivan	1997
EU0170	One Automac Groover	1983
EU0180	One Hauncher / Pistorius	1983
EU0190	One Beveler / Stefani BRT	1988
EU0191	One Beveler / Stefani BRT	1995
EU0200	Door Fabrication Line / Brevetti B-84	1990
EU0201	Door Fabrication Line / Brevetti C-16	1995

EMISSION CONTROLS:

The wood working equipment listed in this table is ducted to several baghouses that control particulate matter emissions. The baghouses exhaust through stacks 01A, 01B, 01C, 01D, 01E, 01F, 01G, 01H, 01I, 01J, 01K, 01L, 01M, 01N, and 01O. (2004 EIQ Emission Points)

PERMIT CONDITION [EU0010 through EU0201]-001
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 this emission unit using the procedures contained in USEPA 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 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) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A1 or A2), 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. (see Attachment B)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments A1 or A2, 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.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0158, EU0159, EU0166, EU0167, EU0019, EU0030, EU0034 and EU0168	
Emission Unit	Description
EU0158	Two (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill; Installed in 2001; Controlled by Baghouse with 99.9% efficiency; MHDR = 3.19 tons/hr
EU0159	Four (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill; Installed 2001; Controlled by Baghouse with 99.9% efficiency; MHDR = 3.19 tons/hr
EU0166	Two (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill; Installed 2001; Controlled by Baghouse with 99.9% efficiency; MHDR = 3.19 tons/hr
EU0167	Two (Edgebanding Dept.) Boring Machines / Nottmeyer Auto Drill; Installed 2001; Controlled by Baghouse with 99.9% efficiency; MHDR = 3.19 tons/hr
EU0019	One SP-type saw; Installed 2001; Controlled by Baghouse with 99.9% efficiency; MHDR = 43.92 tons/hr
EU0030	Two Single Side Soft Formers / Homag M47082; Installed 2001; Controlled by Baghouse with 99.4% efficiency; MHDR = 12.5 tons/hr
EU0034	One (Edge Banding Dept.) Cut-Off Saw / Anthon, S.N. 01470466006; Installed 2001; Controlled by baghouse with 99.9% efficiency; MHDR = 7.52 tons/hr
EU0168	One Strip Line Double-Sided Edgebander, installed 2001

PERMIT CONDITION EU(0158/0159/0166/0167/0019/0030/0034/0168)-001
 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 this emission unit using the procedures contained in USEPA 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 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:
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 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A1 or A2), 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. (see Attachment B)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments A1 or A2, 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.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five years.

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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU(0158/0159/0166/0167/0019/0030/0034/0168)-002

10 CSR 10-6.060 Construction Permits Required
Permit to Construct Number 102000-031 (issued October 17, 2000)

Operating Conditions:

O'Sullivan Industries, Inc. shall control emissions from the equipment permitted herein using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. Each baghouse 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 Missouri Department of Natural Resources (DNR) employees may easily observe them. Replacement bags for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition #1]

Monitoring & Recordkeeping:

- 1) O'Sullivan Industries, Inc. shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours of operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty (Attachment D). [Special Condition #2]
- 2) O'Sullivan Industries, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. (Attachment E) [Special Condition #3]

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 determines that annual VOC emissions from these emission units exceed the emission limitation.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

EU0280 & EU0290 – Laminator and Printers	
Emission Unit	Description
EU0280	Harlan Laminator
EU0290	20 Inkjet Printers

PERMIT CONDITION (EU0280-EU0290)-001
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

The permittee shall not emit more than 39.9 tons of volatile organic compounds (VOC) from emission units EU0280 and EU0290 in any consecutive 12-month period. [Special Condition #1]

Monitoring:

- 1) O'Sullivan Industries, Inc. shall monitor all VOC-Containing materials used in these processes and shall calculate and summarize VOC emissions monthly based on the content of the materials used and the assumption that all VOCs are emitted into the air. [Special Conditions #2 & #3]
- 2) O'Sullivan Industries, Inc. shall determine the rolling 12-month VOC emissions by the 10th day of each month. (Attachment F) [Special Condition #4]

Recordkeeping:

O'Sullivan Industries, Inc. shall maintain all records on site for at least two years for inspection by Missouri Air Pollution Control Program Enforcement personnel.

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 determines that annual VOC emissions from these emission units exceed the emission limitation.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [Special Condition #6]

EU0210, EU0220 & EU0250-EU0270	
Emission Unit	Description
EU0210	Paint Booth 4A
EU0220	Paint Booth 4B
EU0250	Edge Banding Process
EU0260	Forklift Repair Area Parts Washer
EU0270	Linear Groover

PERMIT CONDITION EU(0210/0220/0250/0260/0270)-001
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 this emission unit using the procedures contained in USEPA 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 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) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A1 or A2), 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. (see Attachment B)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments A1 or A2, 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.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU(0210/0220/0250/0260/0270)-002

10 CSR 10-6.060 Construction Permits Required
Permit to Construct Number 1095-015 (issued October 15, 1995)

Emission Limitation:

O'Sullivan Industries, Inc. shall not emit more than 40.0 tons of volatile organic compounds (VOC) in any consecutive 12-month period from paint booth 4A, paint booth 4B, the edge banding process, the linear groover, the GreCon and Black Brothers Laminator, and the forklift repair area. [Special Condition #1]

Monitoring & Recordkeeping:

Monthly records shall be kept that list the VOC emissions from the emission points (Attachment F). The records shall also contain the most recent 12-month total of VOC emissions. These records shall include, at a minimum, VOC emissions data from the previous 60-month period. This information shall be made immediately available for inspection to Department of Natural Resources' personnel upon request. [Special Condition # 2]

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 determines that annual VOC emissions from these emission units exceed the emission limitation.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [Special Condition #3]

EU0300 – Sawdust Handling Operations	
Emission Unit	Description
EU0300	Sawdust Handling Operations (includes grinding, an enclosed conveyor, a stockpile enclosed in a building, and the haul road)

PERMIT CONDITION EU0030-001

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 this emission unit using the procedures contained in USEPA 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 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) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment A1 or A2), 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. (see Attachment B)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments A1 or A2, 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.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
- 6) All records shall be maintained for five years.

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 semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0030-002
10 CSR 10-6.060 Construction Permits Required
Permit to Construct Number 072002-018 (issued July 26, 2002)

Emission Limitation:

O'Sullivan Industries, Inc. shall not emit more than 15 tons of particulate matter less than ten (10) microns in diameter (PM10) in any consecutive 12 month period from the grinder, the haul road, the storage pile and the conveyor. [Special Condition #1]

Monitoring & Recordkeeping:

Attachment G or an equivalent for shall be used for this purpose. O'Sullivan Industries, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources; personnel upon request. [Special Condition #2]

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 determines that annual PM10 emissions from these emission units exceed the emission limitation.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit. [Special Condition #3]

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) 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 10-6.050 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 complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

- 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. Qualified personnel shall perform all tests.
- 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 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt O'Sullivan Industries, Inc. from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

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 requirement is not federally enforceable.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.

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

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:

- i) 10 CSR 10-6.030, "*Sampling Methods for Air Pollution Sources*";
 - ii) 10 CSR 10-6.040, "*Reference Methods*";
 - iii) 10 CSR 10-6.070, "*New Source Performance Standards*";
 - iv) 10 CSR 10-6.080, "*Emission Standards for Hazardous Air Pollutants*"; or
- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065(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 semiannual 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)1.J Emissions Trading

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 semiannually (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, Kansas 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 application 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, Kansas 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, Kansas 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 APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP 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 APCP 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, Kansas 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 Jimmy McAfee, Director of Process Improvement and Quality. 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) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

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- 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) MDNR 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 draft 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 C

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min.	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 _____

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 August 3, 2005;
- 2) 2005 Emissions Inventory Questionnaire, received March 31, 2006; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) In the permit application and according to APCP 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.
- 2) 10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.
- 3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Process* was determined not to apply to the Emission Units at this facility because they all have a potential to emit less than 0.5 tons/hr. This is demonstrated in the table under the heading of "Other Regulatory Determinations."

Construction Permit Revisions

- 1) Construction Permit 0993-005 was issued for five emission sources and limited their VOC emissions for any rolling 12-month period to 39.9 tons. Of the five, only two are still operating (EU0270 and

EU0280). The operating permit includes only these two emission units and limits their VOC emissions to 39.9 tons in any rolling 12-month period.

- 2) Construction Permit 1095-015 was issued for several pieces of equipment all of which are still operating except the Grecon Laminator. The operating permit does not include the Grecon Laminator because it has been removed from service.

New Source Performance Standards (NSPS) Applicability

No NSPS requirements apply to this installation because its emission units are either in a source category that is not regulated by the NSPS or of a size that exempts them from coverage by a NSPS. For example, the natural gas-fired boiler in the pumphouse has a heat input rating of 1.43 MMBtu/hr, which is less than the applicability threshold of 10 MMBtu/hr in 40 CFR 60, Subpart Dc.

Maximum Available Control Technology (MACT) Applicability

10 CSR 10-6.075(3)(JJ) Maximum Achievable Technology Regulations, National Emission Standards for Wood Manufacturing Operations, does not apply to this installation at this time. This regulation applies to facilities that manufacture wood furniture and that have the potential to emit 10 tons per year of any hazardous air pollutant (HAPs) or 25 tons per year or more of any combination of HAPs. Although the installation manufactures wood furniture, its potential to emit HAPs does not exceed either the 10 ton-per-year or 25 ton-per-year emission thresholds that trigger applicability. The permittee reported no emissions of HAPs in the Emissions Inventory Questionnaire for 2004.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to ACP 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.

Particulate matter emissions from spray paint booths and from woodworking operations such as sawing, sanding, routing, grinding and drilling are captured and ducted to fabric filter control devices. PM

emissions from industrial processes such as these are limited by 10 CSR 10-6.400. As shown in the tables in the following section, "Other Regulatory Determinations," the uncontrolled PM emission rates for the PM-generating equipment at the plant are all calculated to be less than the applicable emission limit in 10 CSR 10-6.400. This means that the PM control devices are not necessary to achieve compliance with the applicable emission limit.

Other Regulatory Determinations

The regulation 10 CSR 10-6.400, Restriction of Emission of Particulate Matter from Industrial Processes, applies to industrial processes such as those at the O'Sullivan installation. Section (1)(B)11. of 10 CSR 10-6.400 states that emission units are exempt from this rule if, at maximum design capacity, they have a potential to emit PM at a rate less than 0.5 pound per hour. The potential PM emissions of each piece of equipment were computed using process information, an uncontrolled emission factor and a fabric filter control efficiency, and are presented in the two tables below. In each table, the Emission Unit's potential to emit (PTE) particulate matter (PM) is shown in the far right column.

Wood Working Processes:

Emission Unit	Description	MHDR (tons/hr)	"E" emission limit (lb/hr) ¹	Uncontrolled PM Emission Factor (lb/ton) ²	Uncontrolled maximum PM emissions (lb/hr) ³	Control Efficiency (%)	Potential Maximum Emission Rate (lb/hr)
EU0010	One Giben 8" Saw	51.41	44.84	0.35	17.99	99.35	0.12
EU0011	One Prismatic Saw	43.92	43.38	0.35	15.37	99.9	0.002
EU0012	One Giben 8" Saw	50.91	44.74	0.35	17.82	99.35	0.12
EU0013	One Anthon 8" Saw	50.91	44.74	0.35	17.82	99.35	0.12
EU0014	Two Saws / Holzma HCL213816	39.73	42.46	0.35	13.91	99.35	0.09
EU0015	One Saw/Holzman HCL213816						
EU0016	One Giben SP2000 Saw	39.73	42.46	0.35	13.91	99.35	0.09
EU0017	One Giben SP2000 Saw	39.73	42.46	0.35	13.91	99.35	0.09
EU0018	One Giben SPT2000 Saw	39.73	42.46	0.35	13.91	99.35	0.09
EU0019	One SPT-type saw	43.92	43.38	0.35	15.37	99.9	0.002
EU0020	One Anthon 6" Saw/LNB150	51.35	44.82	0.35	17.97	99.35	0.12
EU0021	One IMC Saw/SRD-60						
EU0022	One Rodgers Saw/707 HUVE	51.35	44.82	0.35	17.97	99.35	0.12
EU0023	Two Saws/Simplex Whirlwind	0.34	1.99	0.35	0.12	99.4	0.001
EU0024	Two Saws/Simplex Whirlwind	0.34	1.99	0.35	0.12	99.4	0.001
EU0025	One Laboratory Table Saw	51.35	44.82	0.35	17.97	99.35	0.12
EU0026	One Splitting Table Saw	51.35	44.82	0.35	17.97	99.35	0.12
EU0027	One Splitting Table Saw	51.35	44.82	0.35	17.97	99.35	0.12
EU0028	One Mafell Saw/KS350	51.35	44.82	0.35	17.97	99.35	0.12
EU0029	One Saw/Simplex Whirlwind	0.34	1.99	0.35	0.12	99.4	0.001
EU0030	Two Single Side Soft Formers/Homag M47082	53.44	1.99	0.35	18.70	99.35	0.13
EU0031	One Double Sided Soft Former/Homag M47243	41.56	42.87	0.35	14.55	99.35	0.10
EU0032	One Splitting Table Saw	1.34	4.99	0.35	0.47	99.4	0.003

Emission Unit	Description	MHDR (tons/hr)	"E" emission limit (lb/hr) ¹	Uncontrolled PM Emission Factor (lb/ton) ²	Uncontrolled maximum PM emissions (lb/hr) ³	Control Efficiency (%)	Potential Maximum Emission Rate (lb/hr)
EU0033	Two Stripline Saws	12.5	22.27	0.35	4.38	99.4	0.03
EU0034	One(Edge Banding Dept.) Cut-Off Saw	7.52	15.84	0.35	2.63	99.9	0.003
EU0035	One (Final Assembly Dept.) Miter Saw	0.115	0.96	0.35	0.04	99.4	0.0002
EU0040	Single Side Edgebanding Line-East	11.71	21.32	0.35	4.10	99.35	0.03
EU0041	Single Side Edgebanding Line-West	11.71	21.32	0.35	4.10	99.35	0.03
EU0050	Cross Cut/End Cap Line	40.72	42.69	0.35	14.25	99.35	0.1
EU0060	Combi-forming Line-North	2.36	7.29	0.35	0.83	99.35	0.006
EU0061	Combi-forming Line-South	2.36	7.29	0.35	0.83	99.35	0.006
EU0062	Combi-forming Line-West, sawing	1.18	4.58	0.35	0.41	99.9	0.0004
EU0070	Foiling Line-South	13.28	23.19	0.35	4.65	99.35	0.03
EU0071	Foiling Line-East	13.28	23.19	0.35	4.65	99.35	0.03
EU0072	Foiling Line-West	13.28	23.19	0.35	4.65	99.35	0.030
EU0080	Band and Bore Line 1	43.86	43.37	0.35	15.18	99.35	0.10
EU0081	Band and Bore Line 2	43.86	43.37	0.35	15.18	99.35	0.10
EU0082	Band and Bore Line 3	43.86	43.37	0.35	15.18	99.35	0.10
EU0083	Band and Bore Line 4	43.86	43.37	0.35	15.18	99.35	0.10
EU0084	Band and Bore Line 5A						
EU0085	Band and Bore Line 5B						
EU0086	Band and Bore Line 6	43.86	43.37	0.35	15.18	99.35	0.10
EU0087	Band and Bore Line 7	43.86	43.37	0.35	15.18	99.35	0.10
EU0088	Band and Bore Line 8	43.86	43.37	0.35	15.18	99.35	0.10
EU0092	Saw/Tenoning Line	7.86	16.32	0.35	2.75	99.9	0.003
EU0101	One Shoda Router	32.60	40.69	0.35	11.41	99.35	0.08
EU0102	One Heian Router	32.60	40.69	0.35	11.41	99.35	0.08
EU0103	One Pin Router	32.60	40.69	0.35	11.41	99.35	0.08
EU0104	One Router	2.37	7.31	0.35	0.83	99.9	0.001
EU0108	One BAZ Machine Center	1.05	4.24	0.35	0.37	99.9	0.0004
EU0109	Two BAZ Machine Centers	1.05	4.24	0.35	0.37	99.4	0.0004
EU0110	Two BAZ Machine Centers	1.44	5.23	0.35	0.50	99.35	0.003
EU0111	One Weeke Machine Center	1.44	5.23	0.35	0.50	99.35	0.003
EU0112	One Biesse Machine Center	1.44	5.23	0.35	0.50	99.35	0.003
EU0120	Rip/Mould Line, Moulder #141041500	21.81	32.34	0.35	7.63	99.35	0.05
EU0121	Rip/Mould Line, Moulder #141005500	21.81	32.34	0.35	7.63	99.35	0.05
EU0122	Rip/Mould Line, Moulder #141004300	21.81	32.34	0.35	7.63	99.35	0.05
EU0130	One Sander/Time Saver 364 2HD	3.09	8.73	0.35	1.08	99.35	0.007
EU0140	Sample Shop Equipment	0.36	2.07	0.35	0.13	99.35	0.001
EU0148	Two (Final Assembly Dept.) Boring Machines	3.19	8.92	0.35	1.12	99.9	0.001

Emission Unit	Description	MHDR (tons/hr)	"E" emission limit (lb/hr) ¹	Uncontrolled PM Emission Factor (lb/ton) ²	Uncontrolled maximum PM emissions (lb/hr) ³	Control Efficiency (%)	Potential Maximum Emission Rate (lb/hr)
EU0149	Two (Final Assembly Dept.) Boring Machines	3.19	8.92	0.35	1.12	99.9	0.001
EU0150	One (Edgeband Dept.) Boring Machine	62.60	46.69	0.35	21.91	99.35	0.15
EU0151	Two (Final Assembly Dept.) Boring Machines	3.19	8.92	0.35	1.12	99.9	0.001
EU0154	One (Wood Shop Dept.) Boring Machine	62.60	46.69	0.35	21.91	99.35	0.15
EU0155	Two (Wood Shop Dept.) Boring Machines	62.60	46.69	0.35	21.91	99.35	0.15
EU0156	One (Wood Shop Dept.) Boring Machine	62.60	46.69	0.35	21.91	99.35	0.15
EU0157	Two (Wood Shop Dept.) Boring Machines	62.60	46.69	0.35	21.91	99.35	0.15
EU0158	Two (Edgebanding Dept.) Boring Machines	3.19	8.92	0.35	1.12	99.9	0.001
EU0159	Four (Edgebanding Dept.) Boring Machines	3.19	8.92	0.35	1.12	99.9	0.001
EU0160	One (Final Assembly Dept.) Cemco Drill	9.51	18.54	0.35	3.33	99.35	0.02
EU0161	One (Final Assembly Dept.) Cemco Drill	9.51	18.54	0.35	3.33	99.35	0.02
EU0162	Six (Final Assembly Dept.) Air Drills	9.51	18.54	0.35	3.33	99.35	0.02
EU0163	One (Edgebander Dept.) Air Drill	0.27	1.71	0.35	0.09	99.9	0.0001
EU0164	One (Edgebander Dept.) Type III Bore Line	43.86	43.36	0.35	15.18	99.35	0.10
EU0165	One (Edgebander Dept.) Type III Bore Line	43.86	43.36	0.35	15.18	99.35	0.10
EU0166	Two (Edgebander Dept.) Boring Lines	3.19	8.92	0.35	1.12	99.9	0.001
EU0167	Two (Edgebander Dept.) Boring Lines	3.19	8.92	0.35	1.12	99.9	0.001
EU0170	One Automac Groover	3.57	9.62	0.35	1.25	99.35	0.01
EU0180	One Hauncher/Pistorius	1.91	6.33	0.35	0.67	99.35	0.004
EU0190	One Beveler	3.18	8.90	0.35	1.11	99.35	0.01
EU0191	One Beveler	3.18	8.90	0.35	1.11	99.35	0.01
EU0200	Door Fabrication Line	1.64	5.71	0.35	0.57	99.35	0.003
EU0201	Door Fabrication Line	1.64	5.71	0.35	0.57	99.35	0.003

Notes:

1. The emission limit (E) under regulation 10 CSR 10-6.400 is calculated using $E = 4.10P^{0.67}$ when $P \leq 30$ tons/hr and $E = (55.0 \times P^{0.11}) - 40$ when $P > 30$ tons/hr. The units of E are pounds of PM per hour and the units of the process weight (P) are in tons per hour.
2. PM emission factor SCC 30700802, for uncontrolled PM emissions from log sawing.
3. Maximum hourly emission rate (lb/hr) is the product of the Maximum Hourly Design Rate (tons/hr) and the PM emission factor (lb/ton).

Spray Painting Booths (EU0210, EU0220, EU0230, EU0240):

Stain Number	Maximum Hourly Design Rate (gal/hr)	ρ (stain density, lb/gal)	Maximum Hourly Design Rate (ton/hr)	E^1 (emission rate limit, lb/hr)	Weight % solids (lb PM per lb paint)	Percent overspray (wt. %)	Emission Factor ² (lb/gal)	CE Filter Control Efficiency (%)	Particulate Matter PTE ³ (lb/hr)
1063	2	8.36	0.00836	0.166	0.97	50	0.041	95.0	0.0041
472	2	6.5	0.0065	0.14	1.5	50	0.049	95.0	0.0049
470	2	6.5	0.0065	0.14	1.7	50	0.055	95.0	0.0055
464	2	8.41	0.00841	0.167	1.2	50	0.050	95.0	0.005
473	2	8.41	0.00841	0.167	0.6	50	0.025	95.0	0.0025

Notes

- 1) The Emission Rate Limit, E is calculated using the equation $E = 4.10P^{0.67}$ from 10 CSR 10-6.400(3)(A)1.
- 2) The Emission Factor (EF) is the amount of particulate matter (solids) released to the air by spray coating, assuming that 50% of the paint applied escapes as overspray. The Emission Factor is calculated using the mass balance equation below.

$$EF = \rho \text{ (lb paint/gal paint)} \times [\text{Wt.\% solids} \div 100] \times (\text{Percent Overspray} \div 100)$$

- 3) The PTE is the maximum rate in pounds per hour that PM is emitted from a spray paint booth for each stain after 95% control by a filter. PTE is calculated by the following equation: $PTE = \text{MHDR (gal/hr)} \times EF \text{ (lb/gal)} \times (1 - \text{CE}/100)$.

The potential PM emission rates shown in the tables above for Wood Working Processes and Spray Paint Booths demonstrate that the maximum PM emission rate from each of these emission units is less than 0.5 pounds per hour. Therefore, all of these emission units are exempt from 10 CSR 10-6.400.

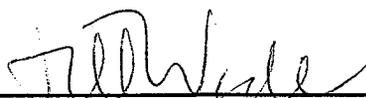
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

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 APCP'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 APCP a schedule for achieving compliance for that regulation(s).

Prepared by:



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