



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JAN 08 2019

Mr. Clinton Gregg
EH&S Manager
PAS Technologies, Inc.
1234 Atlantic St.
Kansas City, MO 64116

RE: New Source Review Permit Amendment - Permit Number: 072017-017B
Project Number: 2018-12-015; Installation Number: 047-0099

Dear Mr. Gregg:

You submitted a request via email on December 7, 2018 to amend Permit No 072017-017A to remove weekly filter inspections. During a recent inspection at your facility, it was determined that weekly filter inspections required by Special Condition 3.G were not being conducted. To follow up on the inspection, you proceeded to have discussions with your manufacturer to see what their recommendations are for ensuring good performance of the baghouse.

In the course of these discussions, the technical staff at the manufacturer, Donaldson Torit, advises not to open the dust collector for any other reason other than the changing of the filters or investigating issues. By opening the dust collectors, it is your belief that employees are put at undue risk from the hazardous powders, increasing the likelihood of an environmental release and potentially damaging the filter and shortening the filter life. Donaldson Torit stated that the greatest risk of damaging the filter is upon installation and opening and closing the doors. The filters must be placed in the correct alignment to ensure that the media and support plates are damaged. Startup checks are currently performed on new filters to ensure that they are correctly installed and conditioned for extended life of the filters.

Staff has agreed that there are other mechanisms that can be used to ensure proper operation of the filter and therefore we agree to remove Special Condition 3.G. As such, Special Condition 3 has been superseded, slightly reworded and renumbered. Noteworthy changes include the complete removal of 3.G, an update to 3.A to say "12" spray booths instead of "11", and, lastly, 3.D was updated to include the replacement of filters "in accordance with the manufacturer's specification".

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6



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Mr. Clinton Gregg
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RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.ao.mo.gov/ahc.

If you have any questions regarding this amendment, please do not hesitate to contact Susan Heckenkamp, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale
Permits Section Chief

KBH:shj

Enclosures

c: Kansas City Regional Office
PAMS File: 2018-12-015

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SPECIAL CONDITIONS:

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

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

PAS Technologies, Inc.
Clay County, S23, T50N, R33W

1. **Superseding Condition**
The conditions of this permit supersede Special Condition 3 found in the previously issued construction permit amendment 072017-017A issued by the Air Pollution Control Program.
2. **Capture Device Requirement - Filter**
 - A. PAS Technologies Inc. shall control particulate emissions from the 12 spray booths (EP21, EP24, EP27, EP28, EP29, EP30, EP31, EP32, EP34, EP43, EP44, and EP48) using a high-efficiency filter capable of a minimum 98% control efficiency.
 - B. PAS Technologies Inc. shall control particulate emissions from the EP35 downdraft table using a fabric filter. A filter shall be installed within the Downdraft Table as defined by the table manufacturer's specifications.
 - C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). PAS Technologies Inc. shall regenerate/replace the filters before breakthrough.
 - D. The filters shall be operated, maintained and replaced in accordance with the manufacturer's specifications.
 - E. PAS Technologies Inc. shall maintain a copy of the filter manufacturer's performance warranty on site.
 - F. Pressure gauges shall be installed within booths EP31, EP32, and EP34 to confirm that the operating pressure drop across each filter is maintained

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SPECIAL CONDITIONS:

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

within the design conditions specified by the manufacturer's performance warranty. The pressure drop shall be measured and recorded at least once every 24 hours. 24-hour periods when spray applied surface coating is non-operational shall be recorded.

- G. PAS Technologies Inc. shall perform a visual inspection of the EP35 downdraft table while it is in operation. Once every 24-hour period that the downdraft table is used, PAS Technologies shall record whether metal shavings and particulate were being pulled to the surface of the Downdraft Table while sanding, grinding, or refurbishing of parts were occurring over the table. Immediate corrective action shall be taken in the event metal shavings and particulate are not pulled to the surface of the table.