



**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

## **INTERMEDIATE STATE 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.

**Intermediate Operating Permit Number:** OP2010-044A  
**Expiration Date:** May 18, 2015  
**Installation ID:** 095-0075  
**Project Number:** 2012-11-072

**Installation Name and Address**

Peterson Manufacturing Company  
4200 East 135th Street  
Grandview, MO 64030  
Jackson County

**Parent Company's Name and Address**

Peterson Manufacturing  
4200 East 135th Street  
Grandview, MO 64030

**Installation Description:**

Mission Plastics North, Maxi-Seal Harness Systems, Inc., and Vector Tool & Engineering are subsidiaries of Peterson Manufacturing. The four companies are considered one installation for permitting purposes. Mission Plastics North employs injection molding to manufacture plastic parts. Maxi-Seal Harness Systems, Inc. fabricates wire and harness connections. Vector Tool & Engineering designs and produces custom tools and injection molds. Peterson Manufacturing constructs vehicle safety lighting systems and accessories from the products of its subsidiaries. The installation is a synthetic minor source of Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAP), Toluene (108-88-3), and Methanol (67-56-1).

This is an amended operating permit to include new equipment, EP17 High Efficiency Hydronic Boiler System; therefore, the expiration date has not been changed.

MAY 10 2013

Effective Date

  
Director or Designee

Department of Natural Resources

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>4</b>
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>6</b>
PERMIT CONDITION PW001 .....	6
10 CSR 10-6.060(2)(I)24 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)	
PERMIT CONDITION PW002 .....	6
10 CSR 10-6.060(2)(I)24 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)	
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>8</b>
PERMIT CONDITION 001 .....	8
10 CSR 10-6.060 Construction Permits Required Construction Permit 0695-029A, Issued September 9, 1996	
PERMIT CONDITION 003 .....	8
10 CSR 10-2.210 Control of Emissions From Solvent Metal Cleaning	
PERMIT CONDITION 004 .....	10
10 CSR 10-2.230 Control of Emissions From Industrial Surface Coating Operations	
PERMIT CONDITION 005 .....	13
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
PERMIT CONDITION 007 .....	14
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes	
PERMIT CONDITION 008 .....	15
10 CSR 10-6.065(2)(I)24 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)	
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>16</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>23</b>
<b>VI. ATTACHMENTS .....</b>	<b>27</b>
ATTACHMENT A .....	28
Fugitive Emission Observations	
ATTACHMENT B .....	29
Opacity Emission Observations	
ATTACHMENT C .....	30
Method 9 Opacity Observations	
ATTACHMENT D .....	31
Inspection/Maintenance/Repair/Malfunction Log	
ATTACHMENT E .....	32
Plantwide VOC Compliance Worksheet	
ATTACHMENT F .....	33
Plantwide Individual HAP Compliance Worksheet	
ATTACHMENT G.....	34
Plantwide Combined HAP Compliance Worksheet	
ATTACHMENT J .....	35
10 CSR 10-2.210 Control of Emissions from Solvent Metal Cleaning Employee Solvent Metal Cleaning Training Log	
ATTACHMENT K.....	36
10 CSR 10-2.210 Control of Emissions from Solvent Metal Cleaning Purchase Records for Cold Cleaning Solvent	
ATTACHMENT L .....	37
10 CSR 10-2.210 Control of Emissions from Solvent Metal Cleaning Solvent Containing Transfer Log	

ATTACHMENT N.....38  
    10 CSR 10-6.400 Compliance Demonstration  
ATTACHMENT O.....39  
    Paint Booth VOC Emission Worksheet

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Mission Plastics North, Maxi-Seal Harness Systems, Inc., and Vector Tool & Engineering are subsidiaries of Peterson Manufacturing. The four companies are considered one installation for permitting purposes. Mission Plastics North employs injection molding to manufacture plastic parts. Maxi-Seal Harness Systems, Inc. fabricates wire and harness connections. Vector Tool & Engineering designs and produces custom tools and injection molds. Peterson Manufacturing constructs vehicle safety lighting systems and accessories from the products of its subsidiaries. The installation is a synthetic minor source of VOC, HAP, Toluene (108-88-3), and Methanol (67-56-1).

This is an amended operating permit to include new equipment, EP17 High Efficiency Hydronic Boiler System; therefore, the expiration date has not been changed. EP17 replaces EP04 which was dismantled in October of 2012.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter $\leq$ Ten Microns (PM <sub>10</sub> )	0.08	0.10	0.11	0.10	0.15
Particulate Matter $\leq$ 2.5 Microns (PM <sub>2.5</sub> )	0.03	0.04	0.03	0.04	0.04
Sulfur Oxides (SO <sub>x</sub> )	0.003	0.005	0.02	0.02	0.01
Nitrogen Oxides (NO <sub>x</sub> )	0.48	0.79	0.71	0.61	0.54
Volatile Organic Compounds (VOC)	1.03	0.81	1.14	1.15	1.45
Carbon Monoxide (CO)	0.41	0.66	0.60	0.51	0.45
Hazardous Air Pollutants (HAP)	0.22	0.16	0.32	0.39	0.56
Toluene (108-88-3)	0.16	0.11	0.22	0.32	0.43
Methanol (67-56-1)	0.05	0.03	0.06	0.08	0.10
Glycol Ethers (20-10-0)	0.02	0.02	0.04	0.03	0.03
Lead Compounds	-	-	0.0003	0.0003	0.0002

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description of Emission Unit
EP01A	Heaters On Metal Finishing Line – 1.5 MMBtu/hr, natural gas
EP06	Safety Kleen Parts Washer
EP07	Paint Spray Booth, Auto Body Refinishing
EP08	Safety Kleen Parts Washer
EP09	Safety Kleen Parts Washer
EP10	Paint Spray Booth Plastic Finishing Line
EP11	Burn Off Oven – 0.75 MMBtu/hr, natural gas
EP12	Safety Kleen Parts Washer
EP14	Paint Spray Booth – General Maintenance
EP15	Parts Washer (Cold Cleaner)

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**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.

<u>Emission Unit</u>	<u>Description of Emission Source</u>
EP01C	Oven (Paint Baking And Dry Off) – 1 MMBtu/hr, natural gas
EP05	Two Letter Presses: 2751
EP16	Powder Coating
EP17	High Efficiency Hydronic Boiler System – 12 MMBtu/hr, natural gas
Enclosed Plastic Injection Molding (Electric Resin Heating)	
Enclosed Copper Wire Coating Line (Electric Resin Heating)	

## 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 on the date of permit issuance.

### PERMIT CONDITION PW001

10 CSR 10-6.060(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)

#### **Emission Limitation:**

The permittee shall emit less than 100 tons of VOC per consecutive 12-month period from the entire installation.

#### **Monitoring/Recordkeeping:**

1. The permittee shall maintain an accurate record of monthly throughput for all VOC emission units.
2. The monthly emissions of VOC for each emission unit shall be calculated, using the monthly throughput and emission factor. Attachment E or an equivalent form generated by the permittee may be used.
3. The permittee shall calculate their annual emissions of VOC by summing the monthly emissions of each emission unit for the last 12 months. The annual emission will be calculated each month using the most recent 12 month's monthly emission totals.
4. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all VOC emitting material used at the installation.
5. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

#### **Reporting:**

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate the emission limitation has been exceeded.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

### PERMIT CONDITION PW002

10 CSR 10-6.060(2)(I)23 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)

#### **Emission Limitation:**

1. The permittee shall emit less than ten tons of any individual HAP from the installation in any consecutive 12-month period.
2. The permittee shall emit less than 25 tons of combined HAP from the installation in any consecutive 12-month period.

#### **Monitoring/Recordkeeping:**

1. The permittee shall record the amount of each HAP emitting material used or produced each month.

2. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAP using Attachments F & G or equivalent forms generated by the permittee.
3. The permittee shall maintain a complete set of MSDS for all HAP emitting material used at the installation.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate either of the emission limitations have been exceeded.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the CFR and CSR for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 0695-029A, Issued September 9, 1996	
Emission Unit	Description
EP11	Burn Off Oven

**Operational Limitations:**

1. Special Condition 1: The permittee shall not burn Teflon, chlorinated plastics, chlorinated solvents, trash, or hazardous waste material in the heat cleaning oven.
2. Special Condition 2: The permittee may use this oven to burn paint off of paint hooks and metal parts which need to be reworked. Coating to be burned off shall have been applied on site.

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>	
10 CSR 10-2.210 Control of Emissions From Solvent Metal Cleaning	
Emission Unit	Description
EP06	Safety Kleen Parts Washer
EP08	Safety Kleen Parts Washer
EP09	Safety Kleen Parts Washer
EP12	Safety Kleen Parts Washer
EP15	Parts Washer (Cold Cleaner)

**Emission Limitation:**

1. The permittee shall not operate or allow the operation of any cold cleaner using a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at 20°C (68°F).
2. Exceptions:
  - a) Cold cleaners using aqueous solvents shall be exempt from the requirements listed above.
  - b) Cold cleaners with a liquid surface area of one square foot or less or a maximum capacity of one gallon or less shall be exempt from the requirements listed above.
  - c) The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The Director shall approve the alternative method.

**Operational Limitations/Equipment Specifications:**

1. Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.

2. When one or more of the following conditions exist, the design of the cover shall be such that it can be easily operated with one hand such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
  - a) The solvent vapor pressure is greater than 0.3 psi measure at 100°F, such as in mineral spirits;
  - b) The solvent is agitated; or
  - c) The solvent is heated.
3. Each cold cleaner shall have a drainage facility, which will be internal so that parts are enclosed under the cover while draining.
4. If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 100°F, then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
5. Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
6. A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
7. Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 100°F, or is heated above 120°F, shall use one of the following control devices:
  - a) A freeboard ratio of at least 0.75;
  - b) Water cover (solvent must be insoluble in and heavier than water); or
  - c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems must receive approval from the Director prior to their use.
8. Each cold cleaner shall be operated as follows:
  - a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir.
  - b) Clean parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer.
  - c) Whenever a cold cleaner fails to perform within the operating parameters established for it by this permit condition, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established operating procedures.
  - d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down and leaks secured until the leaks are repaired.
  - e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods in accordance with the Missouri Hazardous Waste Management Commission Rules codified as 10 CSR 25, as applicable:
    - i) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste: or
    - ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director.
  - f) Waste solvent shall be stored in covered containers only.
9. Operators shall be trained as follows:
  - a) Only persons trained in at least the operational and equipment requirements specified in 10 CSR 10-2.210 for their particular solvent metal cleaning process shall be permitted to operate this equipment;

- b) The supervisor of any person who operates a solvent metal cleaning process shall receive equivalent or greater operational training than the operators; and
- c) Refresher training shall be given to all solvent metal cleaning equipment operators at least once every 12-month period.

**Monitoring:**

The permittee shall monitor the throughputs of the solvents monthly and maintain MSDS of the cleanup solvents used at the installation.

**Recordkeeping:**

- 1. The permittee shall record the throughputs of the solvents monthly and maintain MSDS of the cleanup solvents used at the installation.
- 2. The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis using Attachment J or an equivalent form generated by the permittee.
- 3. The permittee shall maintain the following records for each purchase of cold cleaner solvent, using Attachment K or an equivalent form generated by the permittee:
  - a) Name and address of the solvent supplier;
  - b) Date of purchase;
  - c) Type of solvent purchased; and
  - d) Vapor pressure of solvent in mmHg at 20°C (68°F).
- 4. The permittee shall keep monthly inventory records of solvent consumed. The permittee shall record all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises using Attachment L or an equivalent form generated by the permittee. The permittee shall record maintenance and repair logs for the cold cleaner using Attachment D or an equivalent form generated by the permittee.
- 5. All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 6. All records shall be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 004</b>	
10 CSR 10-2.230 Control of Emissions From Industrial Surface Coating Operations	
<b>Emission Unit</b>	<b>Description</b>
EP10	Paint Spray Booth Plastic Finishing Line
EP14	Paint Spray Booth-General Maintenance

**Emission Limitation:**

- 1. The permittee shall not emit into the atmosphere any VOC from any surface coating operation in excess of:

Surface Coating Operation	Emission Limit lb VOC/gal coating (minus water & non-VOC organic compounds)
Paper	2.9
Vinyl	3.8
Fabric	2.9
Coil	2.6
Can:	
2 Piece Exterior	4.0
Sheet Basecoat	2.8
2 And 3 Piece Interior Body Spray	4.2
2 Piece End Exterior	4.2
3 Piece Side Seam	5.5
End Seal Compound	3.7
Railroad Cars, Farm Implements, Machinery, And Heavy Duty Trucks	3.5
Other Metal Parts:	
Clear Coat	4.3
Extreme Performance And Air Dried Coatings	3.5
All Other Coatings	3.0

- The emission limits apply across all application areas, flashoff areas, and ovens used in any affected coating operation.

**Compliance Methods:**

- Compliance with emission limits may be demonstrated using the method referenced in 10 CSR 10-6.030(14)(C) using the one-hour bake. Emission performance shall be on the basis of a daily volume-weighted average of all coatings used in each surface coating operation as delivered to the coating applicator(s) on a coating line. The daily volume-weighted average (DAVG<sub>VW</sub>) is calculated by the following formula:

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

Where:

A = daily gallons of each coating used (minus water and exempt solvents) in a surface coating operation.

B = lb VOC/gal coating (minus water and exempt solvents).

C = total daily gallons of coatings used (minus water and exempt solvents) in a surface coating operation.

n = number of all coatings used in a surface coating operation; or

- Compliance with the emission limits may be demonstrated on a lb VOC/gal of coating solids basis. The demonstration is made by first converting the emission limit to lb VOC/gal of coating solids as shown in the following three steps:

$$\text{Volume Fraction of VOC} = \frac{\text{Emission Limit}}{7.36}$$

$$\text{Volume Fraction of Solids} = 1 - \text{Volume Fraction of VOC}$$

$$\text{lb VOC/gal of coating solids} = \frac{\text{Emission Limit}}{\text{Volume Fraction of Solids}}$$

Where the Emission Limit is in lb VOC/gal of coating (minus water & exempt solvent). This value is the new compliance figure. The lb VOC/gal of coating solids for each coating used is then determined using the method referenced in 10 CSR 10-6.030(14)(C) using the one-hour bake. The composite daily volume-weighted average of lb VOC/gal of coating solids as tested for in the actual coatings used is compared to the new compliance figure. Source operations on a coating line using coatings with a composite actual daily volume-weighted average value less than or equal to the new compliance figure are in compliance with this rule.

3. Compliance with the emission limits may be demonstrated by the implementation of an emission reduction equivalency compliance plan which utilizes a daily weighted average of emissions from a single or combination of source operations, provided that:
  - a) All source operations involved in the plan are subject to the emission limits of this rule;
  - b) All source operations are part of the same installation;
  - c) The total actual VOC emissions from each 24-hour period do not exceed the sum of the allowable emissions for each source operation for the same period;
  - d) Equivalent emission reductions are accomplished in the time intervals allowed as would be required for individual source operations;
  - e) Testing of raw materials, emissions and/or equipment shall be performed prior to initiation of an alternate compliance plan to verify any equivalent emission reductions claimed. All test methods and procedures, to be acceptable for use in the equivalency determination, shall receive prior review and must have been approved by the Director. Failure to gain test method and procedure approval of the Director will invalidate the equivalency claim.
  - f) The overall plan is approved by the Director.

**Recordkeeping:**

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include:
  - a) The type and the quantity of coatings used daily;
  - b) The coating manufacturer's formulation data for each coating on forms provided or approved by the Director;
  - c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
  - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
  - e) The type and quantity of waste solvents reclaimed or discarded daily;
  - f) The quantity of pieces or materials coated daily; and
  - g) Any additional information pertinent to determine compliance.
2. Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the Director that such records are adequate for the purposes of this rule. This will apply for all surface coating industries until EPA issues national daily emissions recordkeeping protocols for specific industrial classifications.
3. The permittee shall maintain MSDS for all coatings used.
4. All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 005</b>	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
<b>Emission Unit</b>	<b>Description</b>
EP07	Paint Spray Booth, Auto Body Refinishing
EP10	Paint Spray Booth Plastic Finishing Line
EP14	Paint Spray Booth-General Maintenance

**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

**Monitoring:**

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission units are operating and when the weather conditions allow. If no visible emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions, the permittee representative would then conduct a Method 9 observation.
2. The following monitoring schedule shall 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 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 shall be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to daily monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

1. The permittee shall maintain records of all observation results (see Attachments B & C, or equivalent forms generated by the permittee), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units and
  - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of any equipment malfunctions and maintenance using Attachment D.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five years.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 007</b>			
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes			
Emission Unit	Description	MHDR (gal/hr)	Stack #
EP07	Paint Spray Booth, Auto Body Refinishing	2.808	S
EP10	Paint Spray Booth Plastic Finishing Line	5.616	T
EP14	Paint Spray Booth-General Maintenance	2.8	X

**Emission Limitation:**

1. The permittee shall not emit PM in excess of the limits given in the following table:

Emission Unit	Description	PM Emission Limit (lb/hr)
EP07	Paint Spray Booth, Auto Body Refinishing	0.19
EP10	Paint Spray Booth Plastic Finishing Line	0.30
EP14	Paint Spray Booth-General Maintenance	0.19

2. The permittee shall not cause, allow, or permit the emission of PM from any source in a concentration in excess of 0.30 gr/dscf of exhaust gases.

**Operational Limitations:**

The permittee shall maintain and operate the fabric filters associated with the paint spray booths according to the manufacturer’s specifications and recommendations. The fabric filters shall be employed at all times the paint spray booths are operated. Replacement fabric filters shall be kept on hand at all times.

**Monitoring/Recordkeeping:**

1. The permittee shall retain the potential to emit calculations in Attachment N which demonstrate that the above emission limitation will never be exceeded. No further recordkeeping shall be required to demonstrate compliance with the emission limitations.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
3. All records shall be kept for a period of five years.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 008</b>	
10 CSR 10-6.065(2)(I)24 and 10 CSR 10-6.065(5)(C)2 Voluntary Limitation(s)	
<b>Emission Unit</b>	<b>Description</b>
EP07	Paint Spray Booth, Auto Body Refinishing
EP14	Paint Spray Booth-General Maintenance

**Emission Limitation:**

The permittee shall emit less than 1,000 pounds of VOC per consecutive 12-month period from each paint spray booth: EP07 and EP14.

**Monitoring/Recordkeeping:**

1. The permittee shall maintain an accurate record of monthly throughput for each of the paint spray booths.
2. The monthly emissions of VOC for each emission unit shall be calculated, using the monthly throughput and emission factor. Attachment O or an equivalent form generated by the permittee may be used.
3. The permittee shall calculate their annual emissions of VOC by summing the monthly emissions of each emission unit for the last 12 months. The annual emission will be calculated each month using the most recent 12 month's monthly emission totals.
4. The permittee shall maintain a complete set of MSDS for all of the VOC emitting material used in the paint spray booths.
5. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

1. If at any time the yearly emission limit of 1,000 pounds should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the exceedance.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the CFR, CSR, and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

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

1. General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2. Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exception:
    - i) Kansas City metropolitan area. The open burning of household refuse shall take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
  - b) Yard waste, with the following exception:
    - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
3. Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the permittee fails to comply with the conditions or any provisions of the permit.
4. The permittee may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if the permittee fails to comply with the provisions or any condition of the open burning permit.
  - a) In a nonattainment area, as defined in 10 CSR 10-6.020(2)(N)5., the director shall not issue a permit under 10 CSR 10-6.045 unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Recordkeeping. 40 CFR Part 60, Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in §60.2245 - §60.2260. The provisions of 40 CFR Part 60, Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with §60.2245 - §60.2260, the permittee shall conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
6. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A – Test Methods, Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9

promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

1. In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under §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 §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 §§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 18 months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(6)(C)3.B]

### **10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61, Subpart M – National Emission Standard for Asbestos**

1. The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M – National Emission Standard for Asbestos.
2. The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. The permittee shall obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

1. The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2. The permittee may be required by the director to file additional reports.
3. Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
4. The permittee shall submit a full EIQ for the 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
5. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060(5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
6. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
7. The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.

8. The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
9. The permittee shall collect, record, and maintain the information necessary to complete the required forms during each year of operation of the installation.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

#### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

#### **10 CSR 10-6.170 Restriction of PM to the Ambient Air Beyond the Premises of Origin**

##### **Emission Limitation:**

1. The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive PM emissions to go beyond the premises of origin in quantities that the PM may be found on surfaces beyond the property line of origin. The nature or origin of the PM 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 PM 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.

##### **Monitoring:**

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
2. The permittee shall maintain the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
  - b) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once every two weeks for a period of eight weeks.

- ii) If a violation is noted, monitoring reverts to weekly.
- iii) Should no violation of this regulation be observed during this period then-
  - (1) The permittee may observe once per month.
  - (2) If a violation is noted, monitoring reverts to weekly.
- c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

1. The permittee shall document all readings on Attachment A, or its equivalent, noting the following:
  - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
  - b) Whether equipment malfunctions contributed to an exceedance.
  - c) Any violations and any corrective actions undertaken to correct the violation.

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

1. The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2. The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3. The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

**10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is not federally enforceable.**

The permittee may not 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.

**10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

**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 40 CFR Part 82, 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 40 CFR Part 82, Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in 40 CFR Part 82, Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program 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 CFR and 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(5)(E)2 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(5)(C)1 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than 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.
  - 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 10 CSR 10-6.065(5)(C)1 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 shall 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 shall 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 annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

**10 CSR 10-6.065(5)(C)1 Risk Management Plan Under §112(r)**

1. 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 §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:
  - a) June 21, 1999;
  - b) Three years after the date on which a regulated substance is first listed under §68.130; or
  - c) The date on which a regulated substance is first present above a threshold quantity in a process.

**10 CSR 10-6.065(5)(C)1.A 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 under this rule.
6. Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid Part 70 operating permit.

**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

None.

### **10 CSR 10-6.065(5)(B)4, (C)1, and (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 the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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(5)(C)1 Emergency Provisions**

1. An emergency or upset as defined in 10 CSR 10-6.065(5)(C)1 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(5)(C)5 Off-Permit Changes**

1. Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification. Please note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. 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; and
  - 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.

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

The application utilized in the preparation of this permit was signed by Mr. David Armacost, Executive Vice President of Operations. In an e-mail dated March 8, 2013, Peterson Manufacturing Company designated the following individuals as Responsible Officials:

David Armacost – Executive Vice President of Operations  
Steve Ham – Vice President of Manufacturing

If either of these persons terminate employment, or are reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the permittee 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 permittee 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(s) 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(5)(E)4 Reopening-Permit for Cause**

1. This permit may be reopened for cause if:
  - a) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
  - b) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
    - i) The permit has a remaining term of less than three years;
    - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
    - iii) 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,
  - c) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

#### **10 CSR 10-6.065(5)(E)1.A Statement of Basis**

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

## **VI. Attachments**

Attachments follow.





**Attachment C**  
 Method 9 Opacity Observations

Company						Observer		
Location						Observer Certification Date		
Date						Emission Unit		
Time						Control Device		
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
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	17							
	18							
<b>SUMMARY OF AVERAGE OPACITY</b>								
Set Number	Time				Opacity			
	Start	End	Sum	Average				

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

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















**ATTACHMENT N**  
10 CSR 10-6.400 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.400 *Restriction of Emission of PM From Industrial Processes*.

Allowable PM Emission Rate (E) for Process Weights (P) of less than or equal to 30 tph is calculated by:

$$E \text{ (lb/hr)} = 4.1(P)^{0.67}$$

Allowable PM E for P greater than 30 tph is calculated by:

$$E \text{ (lb/hr)} = 55(P)^{0.11} - 40$$

Potential PM Emission Rate = MHDR (tph) x Emission Factor (lb/ton)

$$\text{Potential PM Concentration} = \frac{\text{Potential PM Emission Rate (lb/hr)} \times 7000 \text{ (gr/lb)}}{\text{Stack Flowrate (scf/min)} \times 60 \text{ (min/hr)}}$$

**Uncontrolled Calculations**

Emission Unit	Description	MHDR (gal/hr)	% Solids	Potential PM Emission Rate <sup>1</sup> (lb/hr)	PM Emission Limit (lb/hr)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)
EP07	Paint Spray Booth, Auto Body Refinishing	2.808	57.2	2.93	0.19	0.029	0.3
EP10	Paint Spray Booth Plastic Finishing Line	5.616	57.2	5.86	0.3	0.50	0.3
EP14	Paint Spray Booth-General Maintenance	2.8	57.2	2.92	0.19	0.11	0.3

<sup>1</sup>The emission units are spray booths with a transfer efficiency of 75 percent. The average paint density provided by the permittee was 7.3 lb/gal.

The emission units are not in compliance with this regulation uncontrolled.

**Controlled Calculations**

Emission Unit	Description	Control Efficiency	Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)
EP07	Paint Spray Booth, Auto Body Refinishing	95	0.15	0.19	0.001	0.3
EP10	Paint Spray Booth Plastic Finishing Line	95	0.29	0.3	0.03	0.3
EP14	Paint Spray Booth-General Maintenance	95	0.15	0.19	0.005	0.3

Each emission unit is in compliance with both the PM rate emission limits and PM concentration emission limits while the control devices are properly used and maintained.



# STATEMENT OF BASIS

## **Voluntary Limitations**

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid Part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a Part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than 18 months in advance of the exceedance, since it can take that long or longer to obtain a Part 70 operating permit.

## **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) Intermediate Operating Permit Application, received November 26, 2012
- 2) Intermediate Operating Permit OP2010-044, issued May 19, 2010
- 3) 2011, 2010, 2009, 2008, and 2007 Emissions Inventory Questionnaires
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 5) Construction Permit 0695-029, issued June 15, 1995
- 6) Construction Permit 0695-029A, issued September 9, 1996

## **Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-2.215 *Control of Emissions From Solvent Cleanup Operations* is not applicable to the installation and has not been applied within this permit. This regulation does not apply to sources which emit less than 500 lb/day of VOC from cleaning solvent. The potential VOC emissions from the cleaning solvents located at this installation are only 24 lb/day.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is not applicable to the installation and has not been included within this permit. SO<sub>x</sub> emission units are: EP01A Gas Heaters On Metal Finishing Line, EP01C Oven (Paint Baking And Dry Off), EP11 Burn Off Oven, and EP17 High Efficiency Hydronic Boiler System. EP01A, EP01C, EP11, or EP17 are exempt from this regulation per 10 CSR 10-6.260(1)(A)2 as they exclusively combust pipeline grade natural gas.

## **Construction Permits**

Construction Permit 0695-029, issued June 15, 1995:

Construction Permit 0695-029A, issued :

- ◆ This de minimis construction permit is for the installation of EP11 Burn Off Oven.
- ◆ Amendment A modifies Special Condition 2 to allow EP11 to be used to reclaim material which needs to be reworked.

- ◆ Special Conditions 1 and 2 have been applied within this permit (see Permit Condition 001).

### **New Source Performance Standards Applicability**

40 CFR Part 60, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is not applicable to the installation and has not been applied within this permit. EP17 High Efficiency Hydronic Boiler System is rated at 12 MMBtu/hr, but consists of four boilers each rated at only 3 MMBtu/hr.

40 CFR Part 60, Subpart MM - *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations* is not applicable to the installation and has not been applied within this permit. The provisions of this regulation apply to automobile and light duty truck assembly plants. No definition is given for assembly plants within the rule. EPA's Clean Air Act Applicability Determination Index states that:

By the phrase "automobile or light-duty truck assembly plant," EPA intended to cover plants that construct the chassis and then add the body, engine and other components. The standard does not cover custom shops designed only to build specialty or walk-in van bodies on chassis already assembled by the customer.

The regulation is, therefore, not applicable because the installation does not construct the chassis.

### **Maximum Achievable Control Technology Applicability**

40 CFR Part 63, Subpart T - *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. The facility does not use any solvent containing methylene chloride (75-09-2), perchloroethylene (127-18-4), trichloroethylene (79-01-6), 1,1,1-trichloroethane (71-55-6), carbon tetrachloride (56-23-5) or chloroform (67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than five percent by weight, as a cleaning and/or drying agent.

40 CFR Part 63, Subpart IIII - *National Emission Standards for HAP: Surface Coating of Automobiles and Light-Duty Trucks* is not applicable to the installation and has not been applied within this permit. There are no area source provisions within this regulation.

40 CFR Part 63, Subpart MMMM - *National Emission Standard for HAP for Surface Coating of Miscellaneous Metal Parts and Products* is not applicable to the installation and has not been applied within this permit. There are no area source provisions within this regulation.

40 CFR Part 63, Subpart PPPP - *National Emission Standard for HAP for Surface Coating of Plastic Parts and Products* is not applicable to the installation and has not been applied within this permit. There are no area source provisions within this regulation.

40 CFR Part 63, Subpart HHHHHH - *National Emission Standards for HAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation at this

time and has not been applied within this permit. The installation obtained an EPA exemption letter dated June 8, 2009. The letter states:

“Based on the information provided in your petition for the Facility and your signed certification that none of the coatings sprayed at the facility contain the target HAP, Peterson Manufacturing Company, Grandview, Missouri is exempt from Subpart HHHHHH requirements for its spray-applied coating activities.

Keep a record of this exemption on site at your facility for as long as you perform motor vehicle and mobile equipment surface coating operations. If circumstances change such that your facility intends to spray apply coating containing target HAP, the owner or operator must submit the initial notification required by §63.11175 and comply with the requirements of this subpart.

This exemption is based on information that you have provided to us. Nothing in this exemption shall be construed as limiting the ability of EPA or delegated agencies to pursue enforcement action, if it is determined that your facility was not eligible for this exemption or for any other violations under the Clean Air Act. Providing false information to a federal official is a criminal violation pursuant to federal law, 18 U.S.C. Section 1001.”

40 CFR Part 63, Subpart JJJJJ – *National Emission Standards for HAP for Industrial, Commercial, and Institutional Boilers Area Sources* is not applicable to the installation and has not been applied within this permit. EP17 High Efficiency Hydronic Boiler System meets the definition of *gas-fired boiler* in §63.11237 and is exempt from this regulation per §63.11195(e).

### **National Emission Standards for Hazardous Air Pollutants Applicability**

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

### **GHG Emissions**

This installation is a minor source of GHG.

### **Other Regulatory Determinations**

10 CSR 10-2.230 *Control of Emissions From Industrial Surface Coating Operations* is applicable to EP10 Plastic Finishing Line Paint Spray Booth and EP14 General Maintenance Paint Spray Booth because the installation emits more than 2.7 tons per year of VOC from industrial surface coating operations and has been applied within this permit (see Permit Condition 004). EP07 Auto Body Refinishing Paint Spray Booth is not subject to this regulation because surface coating for automobile refinishing is exempted from the rule.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Condition 005). PM Emission sources are: EP01A Gas Heaters on Metal Finishing Line, EP01C, Oven (Paint Baking and Dry Off), EP04 Building Heat, EP07 Paint Spray Booth, Auto Body Refinishing, EP10 Paint Spray Booth Plastic Finishing Line, EP11 Burn Off Oven, EP14 Paint Spray Booth – General Maintenance, and EP16 Powder Coating. The condition within the permit only requires monitoring, recordkeeping, and reporting for EP04, EP07,

EP10, and EP14. EP01A, EP01C, EP11, and EP16 each have the potential to emit less than 0.5 lb/hr of PM while being properly maintained and operated and, therefore, are always assumed to be in compliance with this regulation.

10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used for Indirect Heating* is applicable to the installation and has been applied within this permit (see Permit Condition 002). EP01A Gas Heaters on Metal Finishing Line and EP17 High Efficiency Hydronic Boiler System are deemed in compliance with this regulation per 10 CSR 10-6.405(1)(C) as they exclusively combust natural gas. Although, EP01A and EP17 are deemed in compliance, they must still be included in the calculation of Q for the installation. EP01C Oven (Paint Baking and Dry Off) and EP11 Burn Off Oven are direct fired sources and; therefore, not subject to this regulation.

An updated Potential To Emit for the installation is shown below:

Pollutant	Potential To Emit (tpy)
CO	5.45
GHG	7,838.59
NO <sub>x</sub>	6.48
PM	4.15
PM <sub>10</sub>	4.15
PM <sub>2.5</sub>	0.49
SO <sub>x</sub>	0.04
VOC	167.90
HAP	66.46
Toluene (108-88-3)	50.73
Methanol (67-56-1)	12.24
Glycol Ethers (20-10-0)	4.81
Hexane (110-54-3)	0.12

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

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

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

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

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Alana L. Rugen, EIT  
Environmental Engineer II

Mr. David Armacost  
Peterson Manufacturing  
4200 East 135th Street  
Grandview, MO 64030

Re: Peterson Manufacturing, 095-0075  
Permit Number: **OP2010-044A**

Dear Mr. Armacost:

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

- ◆ Inclusion of EP17 High Efficiency Hydronic Boiler System
- ◆ Removal of EP04 Building Heat and EP13 Waste Oil Space Heaters
- ◆ Updating the Reported Air Pollutant Emissions table in Section I to include 2009 – 2011 emissions and 2007 – 2008 HAP emissions.
- ◆ Permit Condition PW003 containing a 100 tpy SO<sub>x</sub> limitation and Attachment H were removed from the permit. With the removal of EP-04 Building Heat the installation is now a minor source of SO<sub>x</sub>, rather than a synthetic minor source.
- ◆ Permit Condition 002 and Attachment I were removed. 10 CSR 10-2.040 *Maximum Allowable Emission of PM From Fuel Burning Equipment Used for Indirect Heating* was rescinded October 30, 2011 and replaced by 10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used for Indirect Heating*. EP01A combusts natural gas and is exempt under 10 CSR 10-6.405. EP04 and EP13 are no longer at the installation.
- ◆ Permit Condition 006 and Attachment M were removed. With the removal of EP04 Building Heat the installation is no longer subject to 10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds*.
- ◆ Core Permit Requirement 10 CSR 10-6.110 *Submission of Emission Data, Emission Fees and Process Information* has been revised. This regulation was amended September 30, 2010.
- ◆ Core Permit Requirement 10 CSR 10-2.070 was removed from the permit. 10 CSR 10-2.070 *Restriction of Emission of Odors* was rescinded November 30, 2010 and replaced by 10 CSR 10-6.165 *Restriction of Emission of Odors*.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo §643.078.16 and §621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by

Mr. David Armacost  
Page Two

registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/ark

Enclosures

c: Kansas City Regional Office  
PAMS File: 2012-11-072