

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

JAN 11 2016

Mr. Kevin Blansett
Quaker Window Products Company
PO Box 128
Freeburg, MO 65035

Re: Quaker Window Products Company, 151-0050
Permit Number: OP2015-042

Dear Mr. Blansett:

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (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 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 contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS/jrl

Enclosures

c: PAMS File: 2014-08-019



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 herein.

Intermediate Operating Permit Number: OP2015-042
Expiration Date: JAN 1 1 2021
Installation ID: 151-0050
Project Number: 2014-08-019

Installation Name and Address

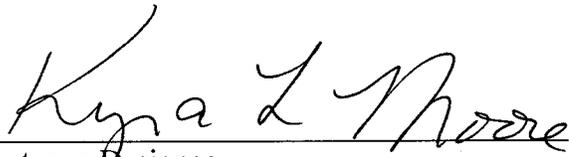
Quaker Window Products Company
504 Highway 63 South
Freeburg, MO 65035
Osage County

Installation Description:

Quaker Window Products Company is located in Freeburg, Missouri. The installation manufactures aluminum, vinyl, and wood windows and doors.

The installation has accepted voluntary limitations on the emissions of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) to qualify for this Intermediate Operating Permit.


Prepared by:
Jacob Robinett
Operating Permit Unit


Director or Designee
Department of Natural Resources

JAN 1 1 2016

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Quaker Window Products Company operates a door and window production facility in Freeburg, Missouri located in Osage County. The installation produces aluminum, vinyl, and wood frames and assembles them for sale. The installation is currently operating under Intermediate Operating Permit OP2010-026A. The facility is not a named source.

The facility is made up of seven different buildings used for different production practices. In Building 1 the facility trims painted aluminum and assembles aluminum windows and doors. Vinyl window frames are also painted in Building 1. In Buildings 2 and 4 the facility trims the painted vinyl window frames and assembles the vinyl windows. The facility also trims aluminum and assembles storm windows and doors in these buildings. In Building 4 aluminum is also cut for screen windows. The facility trims, paints, and assembles wood windows in Building 3 and trims aluminum for wood windows. In Building 5 the facility constructs wood packing crates, pack windows, and ship products. In Building 4 the facility cuts painted aluminum pieces that are for screen windows. . In Building 7 the facility washes and powder coats aluminum to be used for manufacturing of windows and doors. Building 7 also contains the pyrolysis furnace that is used for removing the powder coating off of the paint hooks.

The installation has accepted voluntary limitations on the emissions of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) to qualify for this Intermediate Operating Permit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM ₁₀)	3.05	0.59	0.48	0.17	0.17
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	2.39	0.57	-	0.0007	0.0003
Sulfur Oxides (SO _x)	0.001	-	-	0.0009	0.0009
Nitrogen Oxides (NO _x)	1.31	-	-	0.85	0.85
Volatile Organic Compounds(VOC)	25.59	18.37	12.81	11.40	11.40
Carbon Monoxide (CO)	0.76	-	-	0.49	0.49
Hazardous Air Pollutants (HAPs)	0.06	-	-	-	-

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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
<u>Building #1 - Vinyl</u>	
EP-02A	Vinyl Paint Booth, Colmet Booth CP-480-3P-5-2F, constructed 2012, MHDR 11 gallons/hr
*EP-13B	IR Building Heating System – Propane, MHDR 6.5 MMBtu/hr
EP-41E	Vinyl Cure Oven, SBS, constructed 1988, MHDR 2.68 MMBtu/hr
<u>Building #3 - Wood</u>	
EP-17	Wood Cutting, Disa, MHDR 0.0045 tons/hr
*EP-13B	IR Building Heating System – Propane, MHDR 6.5 MMBtu/hr
EP-29	PM emissions for wood cutting
<u>Building #5 - Packing and Shipping</u>	
*EP-13B	IR Building Heating System – Propane, MHDR 6.5 MMBtu/hr
EP-36	Packing and Shipping
<u>Building #6 - Aluminum</u>	
EP-06	Aluminum Cutting
*EP-13B	IR Building Heating System – Propane, MHDR 6.5 MMBtu/hr
EP-35	Aluminum Trimming
<u>Building #7 - Paint</u>	
*EP-13B	IR Building Heating System – Propane, MHDR 6.5 MMBtu/hr
EP-32	Debridge, Azon 78-0857/MK-000002, constructed 2007, MHDR 4 tons/hr
EP-40	Pyrolysis Furnace/Paint Hook Burn off oven, constructed 2012, propane, MHDR 0.778 MMBtu/hr, Global Finishing Systems BBO-060706/U22993A
EP-41B	Dry off oven, Colmet W.O. # 40564B, constructed 2012, MHDR 2.68 MMBtu/hr
EP-41D	Make-Up Air System, Airedale QDB125JC2200DB1NG6B12YJ760625, Constructed 2012, MHDR 2.12 MMBtu/hr
EP-43	Debridge, Azon 30/28-0612-28, constructed 2012, MHDR 4 tons/hr
<u>Tanks Area</u>	
EP-12A	Fuel Tanks, 500 gallons (Unleaded gasoline)

*Individual units have been grouped under one emission unit number

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Building #1 – Upper Aluminum (light commercial)

- *EP-16 Cold Cleaning of Window Parts
- *EP-20 Sealant Usage
- *EP-27 Drilling/Grinding/Punch Press
- *EP-28 Welders & Acetylene/O₂ Metal Cutting Die Shop & Garage
- *EP-46 Miscellaneous Maintenance Activities – Degreasing Unit Garage
- *EP-50 Hand Tool Usage

Building #2 – Vinyl (Bldg 2 & 4)

- *EP-16 Cold Cleaning of Window Parts
- *EP-18 Vinyl Cutting and Vinyl Welding
- *EP-20 Sealant Usage
- *EP-27 Drilling/Grinding/Punch Press

Building #3 - Wood

- *EP-20 Sealant Usage
- EP-25 Make-Up Air System for Wood Paint Booth, Weather-Rite TOT221HHL/53981, MHDR 2.43 MMBtu/hr

Building #4 – Vinyl (Bldg 2 & 4)

- *EP-16 Cold Cleaning of Window Parts
- *EP-18 Vinyl Cutting and Vinyl Welding
- EP-19 PVC Cement Usage
- *EP-20 Sealant Usage
- *EP-27 Drilling/Grinding/Punch Press

Building #6 – Lower Aluminum (heavy commercial)

- *EP-16 Cold Cleaning of Window Parts
- *EP-20 Sealant Usage
- *EP-27 Drilling/Grinding/Punch Press

Building #7 - Paint

- EP31A Thermal Fill, Azon 78-0857/MK-000001, constructed 2007, MHDR 4 tons/hr
- EP-31B Thermal Fill Flush, Azon 78-0857/MK-000001, constructed 2007, MHDR 4 tons/hr
- EP-41A 5-Stage Wash System, Colmet W.O. #40564C, constructed 2012, MHDR 2.22 MMBtu/hr
- EP-41C Powder Cure Oven with Infrared, Colmet W.O. #40564A, constructed 2012, MHDR 5.05 MMBtu/hr
- EP-42 Thermal Fill, Azon 53350/52-0312, constructed 2012, MHDR 105 gallons/hr
- EP-44 Thermal Fill Flush, Azon, MHDR 0.9375 gallons/hr
- EP- 48 pH Neutralization System
- EP-49 Electric IR Gel Oven
- EP-51 Spray Paint Can Paint Filler

EP-52 Powder Coating Paint Booth

Garage

*EP-28 Welders & Acetylene/O₂ Metal Cutting
*EP-46 Miscellaneous Maintenance Activities – Degreasing Unit
*EP-50 Hand Tool Usage

Tanks Area

EP-12B Fuel Tanks, 12,000 gallons (Diesel)
EP-21 Propane Tanks

Miscellaneous Emission Units

EP-47 Paved Haul Roads

*Individual units have been grouped under one emission unit number

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required

10 CSR 10-6.065 Voluntary Limitation

Construction Permit #102012-014, Issued October 24, 2012

This plant-wide permit condition applies to all emission sources located at this facility including units that are listed as Emission Units without Limitations.

Emission Limitation:

The permittee shall emit less than 100.0 tons of Volatile Organic Compounds (VOC) in any consecutive 12-month period from the entire installation.

Monitoring/Recordkeeping:

1. Attachment A through I or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limit. All products containing the VOC used in the entire installation must be recorded. [Special Condition #2.D.]
2. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.

Reporting:

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

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required

Construction Permit #102012-014, Issued October 24, 2012

This plant-wide permit condition applies to all emission sources located at this facility including units that are listed as Emission Units without Limitations.

Emission Limitation:

1. The permittee shall emit less than 25.0 tons of combined HAPs in any consecutive 12-month period from the entire installation. [Special Condition #2.B.]
2. The permittee shall not emit individual HAPs in excess of the values provided in Table 1 in any consecutive 12-month period. [Special Condition #2.C.]

Operational Limitation:

The permittee shall keep all paints, solvents, cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with the equipment. [Special Condition #8.A.]

Table 1: Individual HAP Emission Limitations

HAP Name	CAS Number	Emission Limitation (tons per year)
Cumene	98-82-8	10.0
Ethylbenzene	100-41-4	10.0
Ethylene Glycol	107-21-1	10.0
Formaldehyde	50-00-0	2.0
Glycol Ethers	20-10-0	5.0
Hydrogen Fluoride	7664-39-3	0.10
MDI	101-68-8	0.10
Methanol	67-56-1	10.0
MIBK	108-10-1	10.0
Naphthalene	91-20-3	10.0
Toluene	108-88-3	10.0
Xylene	1330-20-7	10.0
Other Individual HAPs		10.0

Monitoring/Recordkeeping:

1. Attachments A through I or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limit. All products containing the HAP used in the entire installation must be recorded. [Special Condition #2.D.]
2. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW003

10 CSR 10-6.060 Construction Permits Required
Construction Permit #102012-014, Issued October 24, 2012

This plant-wide permit condition applies to all emission sources located at this facility including units that are listed as Emission Units without Limitations.

Emission Limitation:

The permittee shall emit less than 15.0 tons of PM₁₀ in any consecutive 12-month period from the entire installation. [Special Condition #3.A.]

Monitoring/Recordkeeping:

1. Attachments A through I or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the emission limit. [Special Condition #3.B.]
2. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW004

10 CSR 10-6.060 Construction Permits Required
Construction Permit #102012-014, Issued October 24, 2012

Operational Limitation:

1. Maintenance and/or repair of the road surface shall be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from the paved haul road while the plant is operating. [Special Condition #4.B.]
2. The permittee shall periodically water, wash, and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from the paved haul road while the plant is operating. [Special Condition #4.C.]

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations and reporting 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 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.

Building 1 - Vinyl

PERMIT CONDITION 001 10 CSR 10-6.060 Construction Permits Required Construction Permit #102012-014, Issued October 24, 2012	
Control Devices – Fabric Filters	
Emission Unit	Description
EP-02A	Vinyl Paint Booth

Operational Limitation:

1. The permittee shall control emissions from EP-02A Vinyl Paint Booth using fabric filters. [Special Condition #5.B.]
2. The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications. The manufacturer's specifications shall be retained onsite. The dust collectors and fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. [Special Condition #5.C.]
3. Replacement filters for the fabric filters shall be kept on hand at all times. The replacement filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition #5.D]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the dust collectors and fabric filters at least once every 24 hours using Attachment N or equivalent forms approved by the Air Pollution Control Program. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition #5.E.]
2. The permittee shall maintain an operating and maintenance log using Attachment M or an equivalent form approved by the Air Pollution Control Program for the dust collectors and fabric filters which shall include the following: [Special Condition #5.F.]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).

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

PERMIT CONDITION 002	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-02A	Vinyl Paint Booth

Emission Limitation:

- The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with opacity greater than twenty percent (20%).
- Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to sixty percent (60%).

Monitoring/Recordkeeping:

Permittee shall conduct monitoring and recordkeeping in accordance with 10 CSR 10-6.220 as detailed in Section IV.

Reporting:

- The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
- The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-13	IR Building Heating System
EP-41E	Vinyl Cure Oven

Emission Limitation:

- The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with opacity greater than twenty percent (20%).
- Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to sixty percent (60%).

Monitoring/Recordkeeping:

None, see Statement of Basis.

Reporting:

None, see Statement of Basis.

Building #3 – Wood

PERMIT CONDITION 004 10 CSR 10-6.060 Construction Permits Required Construction Permit #102012-014, Issued October 24, 2012	
Control Devices – Fabric Filters	
Emission Unit	Description
EP-17	Wood Cutting

Operational Limitation:

1. The permittee shall control emissions from EP-17 Wood Cutting using fabric filters. [Special Condition #5.B.]
2. The fabric filters shall be operated and maintained in accordance with the manufacturer’s specifications. The manufacturer’s specifications shall be retained onsite. The dust collectors and fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources’ employees may easily observe them. [Special Condition #5.C.]
3. Replacement filters for the fabric filters shall be kept on hand at all times. The replacement filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition #5.D]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the dust collectors and fabric filters at least once every 24 hours using Attachment N or equivalent forms approved by the Air Pollution Control Program. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition #5.E.]
2. The permittee shall maintain an operating and maintenance log using Attachment M or an equivalent form approved by the Air Pollution Control Program for the dust collectors and fabric filters which shall include the following: [Special Condition #5.F.]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 005	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-13	IR Building Heating System
EP-29	PM emissions for wood cutting

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with opacity greater than twenty percent (20%).
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to sixty percent (60%).

Monitoring/Recordkeeping:

None, see Statement of Basis.

Reporting:

None, see Statement of Basis.

Building #5 – Packing and Shipping

PERMIT CONDITION 006	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit #102012-014, Issued October 24, 2012	
Control Devices – Fabric Filters	
Emission Unit	Description
EP-36	Packing and Shipping

Operational Limitation:

1. The permittee shall control emissions from EP-36 Packing and Shipping using fabric filters. [Special Condition #5.B.]
2. The fabric filters shall be operated and maintained in accordance with the manufacturer’s specifications. The manufacturer’s specifications shall be retained onsite. The dust collectors and fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources’ employees may easily observe them. [Special Condition #5.C.]
3. Replacement filters shall be kept on hand at all times. The replacement filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition #5.D]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the dust collectors and fabric filters at least once every 24 hours using Attachment N or equivalent forms approved by the Air Pollution Control Program. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition #5.E.]

2. The permittee shall maintain an operating and maintenance log using Attachment M or an equivalent form approved by the Air Pollution Control Program for the dust collectors and fabric filters which shall include the following: [Special Condition #5.F.]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Building #6 - Aluminum

PERMIT CONDITION 007	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
EP-06	Aluminum Cutting

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with opacity greater than twenty percent (20%).
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to sixty percent (60%).

Monitoring/Recordkeeping:

Permittee shall conduct monitoring and recordkeeping in accordance with 10 CSR 10-6.220 as detailed in Section IV.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 008 10 CSR 10-6.060 Construction Permits Required Construction Permit #102012-014, Issued October 24, 2012	
Control Devices – Dust Collectors	
Emission Unit	Description
EP-35	Aluminum Trimming

Operational Limitation:

1. The permittee shall control emissions from EP-35 Aluminum Trimming using dust collectors. [Special Condition #5.A.]
2. The dust collectors shall be operated and maintained in accordance with the manufacturer’s specifications. The manufacturer’s specifications shall be retained onsite. The dust collectors and fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources’ employees may easily observe them. [Special Condition #5.C.]
3. Replacement filters for the dust collectors shall be kept on hand at all times. The replacement filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition #5.D]

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the dust collectors and fabric filters at least once every 24 hours using Attachment N or equivalent forms approved by the Air Pollution Control Program. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty. [Special Condition #5.E.]
2. The permittee shall maintain an operating and maintenance log using Attachment M or an equivalent form approved by the Air Pollution Control Program for the dust collectors and fabric filters which shall include the following: [Special Condition #5.F.]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Building #7 - Paint

PERMIT CONDITION 009

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*
10 CSR 10-6.060 Construction Permits Required
Construction Permit #102012-014, Issued October 24, 2012

Control Device – Cyclone with Fabric Sock

Emission Unit	Description
EP-32	Debridge
EP-43	Debridge

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 2.22 lbs/hr from EP-32.
2. The permittee shall not emit particulate matter in excess of 3.22 lbs/hr from EP-43.

Operational Limitation:

1. The permittee shall control emission from the following emission units using cyclone fitted with a fabric sock: [Special Condition #6.A.]
 - a) EP-32 Debridge
 - b) EP-43 Debridge
2. The cyclone fitted with a fabric sock shall be operated and maintained in accordance with the manufacturer's specifications. The manufacturer's specifications shall be retained onsite. [Special Condition #6.B.]
3. Replacement filters for the fabric sock shall be kept on hand at all times. The replacement filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition #6.C.]

Monitoring/Recordkeeping:

1. The permittee shall monitor visible emissions as an indicator of proper operation of the cyclone fitted with a fabric sock. During proper operation, no visible emissions should occur. If visible emissions are observed, the permittee shall perform corrective action. [Special Condition #6.D.]
 - a) Visible emission observations shall be made daily using U.S. EPA Method 22-like procedures for a duration of two minutes. Observations shall be made while the emission unit is in operation.
2. The permittee shall maintain an operating and maintenance log using Attachment M or equivalent form approved by the Air Pollution Control Program for the cyclone fitted with a fabric sock which shall include the following: [Special Condition #6.E.]
 - a) Time of daily observation.
 - b) Visible emission observation results.
 - c) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - d) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).

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

PERMIT CONDITION 010	
10 CSR 10-6.060 Construction Permits Required Construction Permit #102012-014, Issued October 24, 2012	
Control Device - Afterburner	
Emission Unit	Description
EP-40	Pyrolysis Furnace/Paint Hook Burnoff Oven

Operational Limitation:

- EP-40 Pyrolysis Furnace/Paint Hook Burnoff Oven shall be exclusively used to remove powder paint from paint hooks. [Special Condition #7.A.]
- The permittee shall control emissions from EP-40 Pyrolysis Furnace/Paint Hook Burnoff Oven using an afterburner. The permittee shall not operate EP-40 Pyrolysis Furnace/Paint hook Burnoff Oven without the afterburner. The afterburner shall be operated between 1,400 and 1,600 degrees Fahrenheit with more than a 0.5 second residence time. [Special Condition #7.B.]
- The afterburner shall be equipped with an electronic controller with a digital readout, which is able to monitor and display the temperature in the combustion chamber to an accuracy of plus or minus ten percent. [Special Condition #7.C.]
- The afterburner shall be operated and maintained according to manufacturer’s specifications. The manufacturer’s specifications shall be retained onsite. [Special Condition #7.D.]

Reporting:

- The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the operational limitations(s).
- The permittee shall report any deviations from the limitations and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

Tanks Area

PERMIT CONDITION 011	
40 CFR Part 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	
Emission Unit	Description
EP-12A	500 gallon, unleaded gasoline fuel tank

Operational Limitation:

- The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extend periods of time. Measures to be take include, but are not limited to, the following: [§63.11116(a)]
 - Minimize gasoline spills[§63.11116(a)(1)];
 - Clean up spills as expeditiously as practicable[§63.11116(a)(2)];

- c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use[§63.11116(a)(3)];
- d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators[§63.11116(a)(4)].

Monitoring/Recordkeeping:

The permittee is not required to submit notifications or reports, but the permittee shall have records available within 24 hours of a required by the Administrator to document the permittee's gasoline throughput. [§63.11116(b)]

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting 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 Code of Federal Regulations (CFR), Code of State Regulations (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) 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 owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other

pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(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 10-6.110 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 2011, 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 section (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 twelve (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 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.170 Restriction of Particulate Matter 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 particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
- a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

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.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) 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 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) 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.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment J (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

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 Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources 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.

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”;
 - 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.

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.

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- b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
 - 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 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 (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) 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, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's 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 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(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; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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, 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 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(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 record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Keven Blansett, Executive Vice President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR 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 and §(6)(E)1.C 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 B
 Emissions Worksheet

Date (Month and Year):							
Emission Unit	Description	Hours of Operation	Amount Used/ Processed (tons)	PM₁₀		VOC	
				Emission Factor⁷ (lb/ton)	Emissions⁴ (tons)	Emission Factor (lb/ton)	Emissions⁴ (tons)
EP-06	Aluminum Cutting			0.1		0.05	
EP-17	Wood Cutting			33.04 ¹		Malfunctions⁵:	
EP-18	Vinyl Cutting and Welding			0.027			
EP-27	Drilling/Grinding/Punch Press			0.35			
EP-28	Welding & Acetylene/O ₂ Metal Cutting			20.17			
EP-29	Wood Cutting			0.35			
EP-35	Aluminum Trimming			13.13 ²			
EP-36	Packing and Shipping			11.33 ³			
				Malfunctions⁵:			
				Emissions⁶:			

¹The emission factor includes 88.2% overall control for fabric filter usage as required by Special Condition 5.B.

²The emission factor includes 89.5% overall control for dust collector usage as required by Special Condition 5.A.

³The emission factor includes 89.5% overall control for fabric filter usage as required by Special Condition 5.B.

⁴Emissions (tons per month) = Amount Used/Processed (tons) x Emission Factor (lb/ton) x 0.0005 (tons/lb).

⁵Malfunction emissions estimate shall be taken from report required to submit to Missouri DNR APCP per 10 CSR 10-6.050(3)(A) and recorded.

⁶Emissions (tons per month) = the sum of each emission unit's individual emissions.

⁷Emission Factors taken from Construction Permit No. 102012-014

Attachment C
 Fuel Combustion Worksheet

Date (Month and Year):						
Emission Unit	Description	Amount of Propane Combusted (1000 gallons)	PM₁₀		VOC	
			Emission Factor¹ (lb/1000 gallons)	Emissions² (tons)	Emission Factor¹ (lb/1000 gallons)	Emissions² (tons)
EP-13A	IR Building Heating System		0.7		1.0	
EP-40	Pyrolysis Furnace/Paint Hook Burnoff Oven					
EP-41A	5 Stage Aluminum Wash System					
EP-41B	Aluminum Dry Off Oven					
EP-41C	Aluminum Powder Cure Oven with Infrared					
EP-41D	Make-up Air System					
EP-41E	Vinyl Cure Oven					
			PM₁₀ Malfunction³:		VOC Malfunction³:	

¹Emission Factor taken from AP 42 Table 1.5-1 Emission Factors for LPG Combustion.

²Emissions (tons per month) =Amount of Propane Combusted (1000 gallons) x Emission Factor (lb/1000 gallons) x 0.0005 (tons/lb)

³Malfunction emissions estimate shall be taken from report required to submit to Missouri DNR APCP per 10 CSR 10-6.050(3)(A) and recorded.

Attachment D
Tank Worksheet

Date (Month and Year):					
Emission Unit	Description	Emission Type	Amount Used (1000 gallons)	VOC Emission Factor¹ (lb/1000 gallons)	VOC Emissions² (tons)
EP-12A	Gasoline Storage Tank	Working Loss		8.2	
EP-12B	Diesel Storage Tank			0.02	
Emission Unit	Description	Emission Type	Size (1000 gallons)	VOC Emission Factor³ (lb/1000 gallons-year)	VOC Emissions⁴ (tons)
EP-12A	Gasoline Storage Tank	Breathing Loss		23.4	
EP-12B	Diesel Storage Tank			0.04	
				Malfunction Emissions⁵:	
				Emissions⁶:	

¹Emission Factors taken from SCC 40400205 and 40301021 respectively.

²Emissions (tons per month) = Amount Used (1000 gallons) x VOC Emission Factor (lb/1000 gallons) x 0.0005 (tons/lb).

³Emission Factors taken from SCC 40400102 and 40301019 respectively.

⁴Emissions (tons per month) = Size (1000 gallons) x VOC Emission Factor (lb/1000 gallons-year) x 0.0005 (tons/lb) x 0.083 (years/month).

⁵Malfunction emissions estimate shall be taken from report required to submit to Missouri DNR APCP per 10 CSR 10-6.050(3)(A) and recorded.

⁶Emissions (tons per month) = the sum of each emission unit's individual emissions.

Attachment E
 Mass Balance Worksheet

Date (Month and Year):															
Emission Unit	Description	Hours of Operation	Material Used ¹	Amount Used (gallons)	Density (lb/gal)	VOC Content (%)	VOC Emissions ² (tons)	Solids Content (%)	PM ₁₀ Emissions ² (tons)	HAP Name: CAS No.:		HAP Name: CAS No.:		Combined HAP	
										Content (%)	Emissions ² (tons)	Content (%)	Emissions ² (tons)	Content (%)	Emissions ² (tons)
EP-16	Cold Cleaning of Window Parts														
EP-19	PVC Cement Usage														
EP-20	Sealant Usage														
EP-23	Touchup Paint Area														
EP-25	Wood Paint Booth														
EP-45	5 Stage Wash System														
EP-46	Degreasing Unit														
							Malfunction³		Malfunction³		Malfunction³		Malfunction³		Malfunction³
							Emissions⁴:		Emissions⁴:		Emissions⁴:		Emissions⁴:		Emissions⁴:

¹All of the materials used by these emission units shall be reported on this worksheet. If additional columns are needed for individual HAPs, the facility may either add additional columns (if using an excel spreadsheet) or copy additional pages and only fill out the individual HAP columns on the additional pages (if using paper worksheets). If additional rows are needed for materials, the facility may either add additional rows (if using an excel spreadsheet) or copy additional pages (if using paper worksheets).

²Emissions (tons per month) = Amount Used (gallons) x Density (lb/gal) x Content (%) x 0.0005 (tons/lb).

³Malfunction emissions estimate shall be taken from report required to submit to Missouri DNR APCP per 10 CSR 10-6.050(3)(A) and recorded.

⁴Emissions (tons per month) = the sum of each material's individual emissions.

⁵If the MSDS provides a range of values, use the highest number.

Attachment F
 Miscellaneous Equipment Worksheet

Date (Month and Year):				
Emission Unit	Description	Number of Deliveries	VOC Emission Factor (lb/delivery)	VOC Emissions ¹ (tons)
EP-21	Propane Tanks		41.61	
Emission Unit	Description	Number of Flushes	VOC Emission Factor (lb/flush)	VOC Emissions ² (tons)
EP-31B	Existing Thermal Fill Flush		0.86	
EP-44	New Thermal Fill Flush			
			VOC Malfunction Emissions ⁹ :	
			VOC Emissions ³ :	

¹Emissions (tons per month) = Number of Deliveries x VOC Emission Factor (lb/delivery) x 0.0005 (ton/lb).

²Emissions (tons per month) = Number of Flushes x VOC Emission Factor (lb/flush) x 0.0005 (ton/lb).

³VOC Emissions (tons per month) = the sum of each emission unit's individual emissions.

Date (Month and Year):					
Emission Unit	Description	Hours of Operation	Number of Cuts	PM ₁₀ Emission Factor (lb/cut)	PM ₁₀ Emissions ⁴ (tons)
EP-29	PM Emissions from Wood Cutting			0.0022 ⁵	
Emission Unit	Description	Vehicle Miles Traveled (VMT)		PM ₁₀ Emission Factor (lb/VMT)	PM ₁₀ Emissions ⁶ (tons)
EP-47	Haul Roads			0.05	
Emission Unit	Description	Hours of Operation	Amount Processed (ft)	PM ₁₀ Emission Factor (lb/ft)	PM ₁₀ Emissions ⁷ (tons)
EP-32	Existing Debridge			0.034	
EP-43	New Debridge				
				PM ₁₀ Malfunction Emissions ⁹ :	
				PM ₁₀ Emissions ⁸ :	

⁴Emissions (tons per month) = Number of Cuts x PM₁₀ Emission Factor (lb/cut) x 0.0005 (ton/lb).

⁵The emission factor includes 78.6% control for dust collector usage as required by Special Condition 5.A.

⁶Emissions (tons per month) = Vehicle Miles Traveled (VMT) x PM₁₀ Emission Factor (lb/VMT) x 0.0005 (ton/lb).

⁷Emissions (tons per month) = Amount Processed (ft) x PM₁₀ Emission Factor (lb/ft) x 0.0005 (ton/lb).

⁸PM₁₀ Emissions (tons per month) = the sum of each emission unit's individual emissions.

⁹Malfunction emissions estimate shall be taken from report required to submit to Missouri DNR APCP per 10 CSR 10-6.050(3)(A) and recorded.

Attachment G
 Thermal Fill Worksheet

Date (Month and Year):											
Emission Unit	Description	Hours of Operation ¹	Amount Used (gallons)	VOC		Ethylene Glycol (107-21-1)		MDI (101-68-8)		Combined HAP	
				Emission Factor ² (lb/gal)	Emissions ³ (tons)	Emission Factor ² (lb/gal)	Emissions ³ (tons)	Emission Factor ² (lb/gal)	Emissions ³ (tons)	Emission Factor ² (lb/gal)	Emissions ³ (tons)
EP-31A	Existing Thermal Fill			0.008		0.008		5.33 x 10 ⁻¹⁰		0.008	
EP-42	New Thermal Fill										
				Malfunction⁴		Malfunction⁴		Malfunction⁴		Malfunction⁴	
				Emissions⁵:		Emissions⁵:		Emissions⁵:		Emissions⁵:	

¹Hours of Operation to include startup and shutdown time.

²Emission Factors taken from Construction Permit No. 102012-014.

³Emissions (tons per month) = Amount Used (gallons) x Emission Factor (lb/gal) x 0.0005 (ton/lb).

⁴Malfunction emissions estimate shall be taken from report required to submit to Missouri DNR ACP per 10 CSR 10-6.050(3)(A) and recorded.

⁵Emissions (tons per month) = the sum of each emission unit's individual emissions and any malfunction emissions that occurred.

Attachment H
 Installation Wide Monthly Emissions

Date (Month and Year):																	
Attachment	VOC	PM₁₀	Combined HAP	Toluene (108-88-3)	Xylene (1330-20-7)	MIBK (108-10-1)	Ethylbenzene (100-41-4)	Glycol Ethers (20-10-0)	Ethylene Glycol (107-21-1)	Naphthalene (91-20-3)	Cumene (98-82-8)	Formaldehyde (50-00-0)	Methanol (67-56-1)	Hydrogen Fluoride (7664-39-3)	MDI (101-68-8)	HAP Name: CAS No.:	HAP Name: CAS No.:
A																	
B																	
C																	
D																	
E																	
F																	
G																	
Installation-wide Emissions (tons per month):																	

Fill out the appropriate cells with the emissions from each attachment for the date (month and year).

Attachment I
 Installation-wide 12-Month Rolling Totals

Month	Year	VOC	PM ₁₀	Combined HAP	Toluene (108-88-3)	Xylene (1330-20-7)	MIBK (108-10-1)	Ethylbenzene (100-41-4)	Glycol Ethers (20-10-0)	Ethylene Glycol (107-21-1)	Naphthalene (91-20-3)	Cumene (98-82-8)	Formaldehyde (50-00-0)	Methanol (67-56-1)	Hydrogen Fluoride (7664-39-3)	MDI (101-68-8)	HAP Name: CAS No.:	HAP Name: CAS No.:
January																		
February																		
March																		
April																		
May																		
June																		
July																		
August																		
September																		
October																		
November																		
December																		
Installation-wide Emissions (tons per year):																		
Installation-wide Limit on Emissions (tons per year):		100.0	15.0	25.0	10.0	10.0	10.0	10.0	10.0	5.0	10.0	10.0	2.0	10.0	0.1	0.1	10.0	10.0

If totals are less than the installation-wide limits on emissions, then the facility is in compliance.
 Each month complete this worksheet with the data for this month and the previous 11 months

Attachment L

Method 9 Opacity Emissions 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							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

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

STATEMENT OF BASIS

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 eighteen 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 August 11, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received March 4, 2014;
- 3) Construction Permit No. 0888-003A;
- 4) Construction Permit No. 0894-003;
- 5) Construction Permit No. 0894-003A;
- 6) Construction Permit No. 1197-022;
- 7) Construction Permit No. 0798-015;
- 8) Construction Permit No. 0199-007;
- 9) Construction Permit No. 0999-012;
- 10) Construction Permit No. 0999-012A;
- 11) Construction Permit No. 072009-021;
- 12) Construction Permit No. 102012-014;
- 13) Operating Permit No. OP2010-026A;
- 14) WebFIRE; and
- 15) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Emissions Tracking Requirements During Times Of Startup Shutdown And Malfunction Events.

Emission limits apply at all times, including times of Startup, Shutdown, and equipment malfunctions (SSM). In order to track SSM emissions to account for these events, the methods differ according to emission unit type. The units at this facility are primarily fuel combustion equipment (natural gas fired furnaces), and the emissions during SSM events will not differ significantly from times of steady state operation and are accounted for using established emission factors and recorded fuel throughputs. The fuel storage units are subject to the emission limits as well, but are not of the unit type to Startup, Shutdown, or have a Malfunction, and can be accounted for by using established methodologies.

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

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

See Other Regulatory Determinations.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

40 CFR Part 63 Subpart III, *National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production*

This regulation was included in the previous operating permit, but the flexible polyurethane foam operation has been removed from the facility. Therefore, this regulation has been removed from the permit.

Construction Permit History

The following is a brief history of construction permits issued for this installation:

Construction Permit No. 0888-003A

Issued August 15, 1988, the permit authorized the construction of a controlled pyrolysis furnace for the purpose of cleaning cured paint from the metal carriers used to support the windows as they are painted. The furnace has an MHDR of 0.3 MMBtu/hr. Special Conditions associated with maintaining manufacturer's specifications, emission rates below the De Minimis levels, and notification of startup of the unit. The permit conditions have since been superseded and not included in this permit.

Construction Permit No. 0894-003

Issued July 28, 1994, the permit authorized the construction of four (4) water heaters, a painting room and paint bake oven, an aluminum drying oven, a thermal fill flush process, three (3) aluminum saws, a vinyl cutter, an ethylene glycol storage tank, a wood cutting operation, a Masonite cutting operation, a debridge cutting operation, and associated appurtenances. Special Conditions limited the paint usage to less than 82.0 gallons in any consecutive 12-month period. The permit conditions have since been superseded and not included in this permit.

Construction Permit No. 0894-003A

Issued November 14, 1994, the permit amended Construction Permit No. 0894-003 to increase the paint usage from 82 to 300 gallons per year. A VOC limit of 0.65 tons from the paint area near the glass room was established. The permit conditions have since been superseded and not included in this permit.

Construction Permit No. 1197-022

Issued November 4, 1997, the permit authorized the construction of a new ventilation system and an expansion of operations, which includes a new paint room, Phoenix Window saw dust collect, LPG storage tank, Safety Kleen parts washers, sealant curing process, PVC cement drying process, and increasing paint usage in the existing paint room. There are no special conditions associated with this construction permit.

Construction Permit No. 0798-015

Issued June 26, 1998, the permit authorized the construction of a wood painting area that includes a paint booth, spray painting area, and a bake oven. There are no special conditions associated with this construction permit.

Construction Permit No. 0199-007

Issued December 30, 1998, the permit authorized the increase in emission limit for an existing paint booth. Potential emissions of the booth were estimated using a mass balance approach on the paint and found the unconditioned PTE to be 5.1 tons of VOC per year. The VOC limit will increase to 4.5 tons per year compared to the previous 0.64 tons established by Construction Permit No. 0894-003A. There are no special conditions associated with this construction permit.

Construction Permit No. 0999-012

Issued September 24, 2014, the permit authorized the construction of a new paint curing oven and air make-up unit. The special condition restricted the paint booth (EP-02A) and the curing oven to emit for than 78.4 tons of VOC in any consecutive 12-month period. The permit conditions have since been superseded and are not included in this permit.

Construction Permit No. 0999-012A

Issued December 26, 2006, the permit amended Construction Permit No. 0999-012 to establish a limit of less than ten (10) tons individually or twenty-five (25) tons combined of HAPs from the entire installation for any consecutive 12-months to avoid being subject to 40 CFR Part 63 Subpart MMMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. A 2 ton limit for formaldehyde was established as well. Although these limits are part of this permit, the special conditions of this construction permit have since been superseded by another construction permit.

Construction Permit No. 052001-020

Issued May 9, 2001, the permit authorized the replacement of manual operated Thermal Fill and Debridge process equipment with automated equipment. Special Condition #1 states that all previous special conditions associated with the manual operated Thermal Fill and Debridge process can be removed from the permit. There are no other special conditions associated with the construction permit, and this special condition has since been superseded. Therefore, it is not included in this permit.

Construction Permit No. 072009-021

Issued July 30, 2009, the permit authorized the replacement of manual operated Thermal Fill and Debridge process equipment with automated equipment. This permit was part of remedial action for receiving a letter of warning. Construction Permit No. 052001-020 was issued on May 9, 2001 for the replacement, however the installation did not occur within the two years of the date the permit was issued, and was installed in 2007.

Special Conditions associated with the permit include limiting the emission of PM₁₀ to less than 15.0 tons for any consecutive 12 month period for the automated Thermal Fill and Debridge process equipment. An emission limitation of 10.0 tons of ethylene glycol in any consecutive period for the entire installation was established. The permittee was required to install a cyclone dust collector as control equipment for the Debridge Cutting System. Although these limits are part of this permit,

the special conditions of this construction permit have since been superseded by another construction permit.

Construction Permit No. 072009-021A

Issued August 17, 2010, the permit amended the Special Conditions associated with the thermal fill process. By re-evaluating the potential emissions from the original permit, it was determined that the potential ethylene glycol emissions from the thermal fill process to be 0.36 tons per year. Therefore, the Special Condition limiting the installation of emitting less than 10.0 tons of ethylene glycol in any consecutive 12-month period was no longer needed. Although these limits are part of this permit, the special conditions of this construction permit have since been superseded by another construction permit.

Construction Permit No. 102012-014

Issued October 24, 2012, the permit authorized the construction of a new building with the installation of new equipment and modification to existing equipment to increase the production of windows. New equipment includes pyrolysis furnace/paint hook burnoff oven (EP-40), two (2) 5-stage wash system (EP-41A & EP-45), dry off oven (EP-41B), powder cure oven with infrared (EP-41C), make-up air system (EP-41D), vinyl cure oven (EP-41E), new thermal fill (EP-42), new debridge (EP-43), new thermal fill flush (EP-44), and a propane tank. Modified equipment includes vinyl paint booth (EP-02A), aluminum cutting (EP-06), cold cleaning of window parts (EP-16), vinyl cutting and welding (EP-18), sealant usage (EP-20), LPG unloading (EP-21), drilling/grinding/punch press (EP-27), geo grid touch up (EP-33), aluminum trimming (EP-35), packing and shipping (EP-36), and paved haul roads (EP-47). In the application for the Intermediate Operating Permit, the permittee indicated that EP-33 Geo Grid Touch Up is no longer being performed at the facility.

The special conditions of the permit superseded all the special conditions in previously issued construction permits. Special conditions establish a limit of 250.0 tons of VOCs and a limit of 25.0 tons of combines HAPs for the entire installation. The permit also established a limit for individual HAPs that can be found in Table 1 of the construction permit. A limit of 15.0 tons of PM₁₀ in any consecutive 12-month period from the entire installation was also established. The permittee was required to control emissions from EP-34 Wood Sawing/Routing and EP-35 Aluminum Trimming using dust collectors. The permittee was also required to control emissions from EP-02A Vinyl Paint Booth, EP-17 Phoenix Wood Cutting, and EP-36 Packing and Shipping using fabric filters. The permittee was required to control emission from EP-32 Existing Debridge and EP-43 New Debridge using a cyclone fitted with a fabric sock. EP-40 Pyrolysis Furnace/Paint Hook Burnoff Oven shall be exclusively used to remove powder paint from paint hooks and shall control emissions using an afterburner. The permittee shall also keep paints, solvents, and cleaning solutions in sealed containers whenever the materials are not in use.

On May 30, 2013, the Air Pollution Control Program received an Intermediate Air Operating Permit Significant Modification application from Quaker Window Products Company. In that application they proposed to continue the 100.0 tons of VOCs limit that was in OP2010-026A, instead of the 250.0 tons limit in this construction permit. Therefore, the proposed 100.0 ton limit of VOCs is included in this operating permit.

The permittee was required to pave EP-47 Haul Roads with materials such as asphalt, concrete, and/or other material(s), which has been completed. This special condition was put as a plant wide limitation in this operating permit, because EP-47 consist of all haul roads located at the facility.

The special conditions of this construction permit are included in this operating permit; however, the special condition associated with EP-47 Haul Roads has been modified. Since the permittee has completed the requirement to pave all haul roads, that special condition has been left out, but there are operational limitations that are included in this permit associated with the haul roads.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978*

The permittee is not subject to regulation, because all storage vessels have a storage capacity less than 40,000 gallons per §60.110(a).

40 CFR Part 60 Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

The permittee is not subject to regulation, because all storage vessels have a storage capacity less than 40,000 gallons per §60.110a(a).

40 CFR Part 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

The permittee is not subject to regulation, because all storage vessels have a storage capacity less than 75 cubic meters per §60.110b(a).

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart N, *National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*

The chrome tank at the installation is not a chromium electroplating operation. No electricity is involved in the process; therefore, the installation is not subject to the regulation.

40 CFR Part 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The installation uses parts cleaners, but the water soluble ZEP cleaner used in the process does not contain solvents covered by Subpart T. Therefore, this regulation does not apply to the facility.

40 CFR Part 63 Subpart M, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*

The installation is an area source of HAPs and is, therefore, not subject to this regulation per §63.3881(b). The installation has had a 25.0 ton plant wide and 10.0 ton individual limit for HAP emissions since Construction Permit No. 0999-012A was issued December 26, 2006. All of the equipment at the facility that was affected by this construction permit is considered existing sources, since they were installed prior to the original proposal date, August 13, 2002, of this rule. The compliance date for existing sources is the date 3 years after January 2, 2004. [§63.3883(b)]

40 CFR Part 63 Subpart QQQQ, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products*

The installation is an area source of HAPs and is, therefore, not subject to this regulation per §63.4681(b). The installation has had a 25.0 ton plant wide and 10.0 ton individual limit for HAP emissions since Construction Permit No. 0999-012A was issued December 26, 2006. All of the equipment at the facility that was affected by this construction permit is considered existing sources, since they were installed prior to the original proposal date, June 21, 2002, of this rule. The compliance date for existing sources is the date 3 years after May 28, 2003. [§63.4683(b)]

40 CFR Part 63 Subpart CCCCC, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*

The facility is subject to the requirements of this rule. Based on yearly throughput totals from January 2011 to November 2014, the average monthly gasoline throughput of the facility is 1,013.25 gallons per month. The facility is subject to the requirements for facilities with a monthly throughput of less than 10,000 gallons of gasoline.

Yearly Gasoline Throughput Totals

2011	9,548 gallons
2012	5,849 gallons
2013	6,752 gallons
2014	4,378 gallons ¹

¹Total based on January 1, 2014 through November 17, 2014

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	9.05 ²
Total HAPs	< 25.0 ²
NO _x	15.69 ²
PM ₁₀	< 15.0 ²
PM _{2.5}	< 15.0 ²
SO _x	0.02 ²
VOC	< 100.0 ³

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

²Values taken from Construction Permit No. 102012-014. Individual HAPs have various emission limitations shown in the table below.

³Value taken from Significant Modification Application submitted May 24, 2013.

HAP Name	Potential to Emit(tons/year) ¹
Cumene	< 10.0
Ethylbenzene	< 10.0
Ethylene Glycol	< 10.0
Formaldehyde	< 2.0
Glycol Ethers	< 5.0
Hydrogen Fluoride	< 0.1
MDI	< 0.1
Methanol	< 10.0
MIBK	< 10.0
Naphthalene	< 10.0
Toluene	< 10.0
Xylene	< 10.0
Other Individual HAPs	< 10.0

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Other Regulatory Determinations

Updates to Emissions Points: During the review process there was several emission points that were included in OP2010-026A have been modified for various reasons.

Previous EP Number	New EP Number	Reason
EP-13B	No Change	EP-13B is currently listed as “Space Heaters – Propane,” this is being changed to “IR Building Heating System – Propane”
EP-21	No Change	EP-21 is currently listed as “LPG Unloading,” this is being changed to “Propane Tanks.” The emission point consists of three propane tanks at the facility, one 21,100 gallon tank and two 18,000 gallon tanks.
EP-22	EP-46	EP-22 Maintenance Degreasing is a duplicate emission point of EP-46 Miscellaneous Maintenance Activities – Degreasing Unit
EP-34	EP-29	EP-34 Wood Sawing/Routing is a duplicate emission point of EP-29 PM emissions from wood cutting
EP-35	EP-35	EP-35 is currently listed as “Special Sized Windows,” this is being changed to “Aluminum Trimming” to better represent the operations that occur at this emission point.
EP-45	EP-41A	EP-45 5 Stage Wash System is a duplicate emission point of EP-41A 5-Stage Wash System

None	EP-48	pH Neutralization system was included in the previous operating permit but was not assigned an emission point number at that time, however there are no applicable regulations from this unit.
None	EP-49	IR Gel Oven was included in the previous operating permit but was not assigned an emission point number at that time, however there are no applicable regulations from this unit.
None	EP-50	Hand Tool Usage was included in the previous operating permit but was not assigned an emission point number at that time; however there are no applicable regulations from this unit.
None	EP-51	Spray Paint Can Filler was included in the previous operating permit but was not assigned an emission point number at that time; however there are no applicable regulations from this unit.
None	EP-18	Insulation of Doors was included in the last operating permit without an emission point number, however this is a duplicate emission point of EP-18 Vinyl Cutting and Vinyl Welding.
None	EP-52	Powder Coating was included in the previous operating permit but was not assigned an emission point number at that time; however there are no applicable regulations from this unit. It will be renamed "Powder Coating Paint Booth"
None	EP-52	Powder Paint Booth was included in the previous operating permit but was not assigned an emission point number at that time; however there are no applicable regulations from this unit. It will be renamed "Powder Coating Paint Booth."

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule applies to all sources of visible emissions throughout the State of Missouri. The combustion units all burn propane and have PM PTE less than 0.5 lb/hr, therefore no monitoring or record keeping is required for those units.

EP-02A, Vinyl Paint Booth, emits particulate matter, however, from Construction Permit No. 102012-014 the permittee is required to install fabric filter control devices on the paint booth. The fabric filter has 97% control efficiency, and the permit requires the permittee to operate and maintain the fabric filter with the manufacturer's specifications, monitor and record the operating pressure drop across the fabric filters at least once every 24 hours, and maintain an operating and maintenance log. If the permittee remains in compliance with Permit Condition 001, there is no additional monitoring required.

EP-06, Aluminum Cutting, does not meet any of the exemptions and has a potential to emit 4.38 tons per year of particulate matter. The emission point is subject to the rule and the emission limitations, monitoring, recordkeeping, and reporting requirements of Permit Condition 007 of this permit.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

The facility is exempt from this rule per 6.260(1)(A)2. The emission points listed below are exempt from the requirements of this rule, because the combustion units exclusively use liquefied petroleum gas(propane).

Equipment	Fuel
EP-13 IR Building Heating System	Propane
EP-40 Pyrolysis Furnace/Paint Hook Burnoff Oven	Propane
EP-25 Make-Up Air System for Wood Paint Booth	Propane
EP-41A 5-Stage Wash System (stage 1)	Propane
EP-41B Dry-Off Oven	Propane
EP-41C Powder Cure Oven with Infrared	Propane
EP-41D Make-Up Air System (2 units)	Propane
EP-41E Vinyl Cure Oven	Propane

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*

Emission Unit	MHDR (unit/hr)	Emission Factor ¹ (lb PM/unit)	Overall Control Device Efficiency (%)	Uncontrolled PM Emission Rate (lb/hr)	Controlled Emission Rate (lb/hr)
EP-02A	11 gal	1.58	97	17.38	0.52
EP-06	10 tons	0.1	-	1	-
EP-13	0.07 1000 gal	0.7	-	0.05	-
EP-17	0.0045 tons	280	88.2	1.26	0.15
EP-18	1.12 tons	0.027	-	0.03	-
EP-25	0.6 gal	2.56	96	1.53	0.06
EP-27	1 ton	0.35	-	0.35	-
EP-28	0.001 tons	20.17	-	0.02	-
EP-32	12900 ft	0.000282 ²	88.2	3.64	0.43
EP-35	0.0073 tons	125	89.5	0.91	0.1
EP-36	0.0028 tons	107.9	89.5	0.3	0.03
EP-40	0.01 1000 gal	0.7	-	0.01	-
EP-41A	0.02 1000 gal	0.7	-	0.02	-
EP-41B	0.03 1000 gal	0.7	-	0.02	-
EP-41C	0.06 1000 gal	0.7	-	0.04	-
EP-41D	0.02 1000 gal	0.7	-	0.02	-
EP-41E	0.03 1000 gal	0.7	-	0.02	-
EP-43	25,800 ft	0.000282 ²	88.2	7.28	0.86

¹Emission factor taken from Construction Permit No. 102012-014.

²Emission factor taken from Construction Permit No. 072009-021 based on lb Pm/ft.

EP-02A Vinyl Paint Booth

The vinyl paint booth has a maximum hourly design rate of 11 gallons per hour with an emission factor of 1.58 pounds per gallon. The process is equipped with a fabric filter that has an overall control device efficiency of 97%. This rule does not apply because it meets the provisions of 10

CSR 10-6.400(1)(B)14. The provisions of the rule shall not apply to coating operations equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers' specifications or comparable maintenance procedures that meet or exceed manufacturers' specifications.

EP-06 Aluminum Cutting

The Aluminum Cutting has a maximum hourly design rate of 10 tons per hour with an emission factor of 0.1 pounds per ton. EP-06 has an uncontrolled particulate matter emission of 1 pound per hour. The allowable emissions from the process weight rule were calculated to be 19.18 pounds per hour as demonstrated below. The allowable emissions are over 19 times greater than the uncontrolled particulate matter emissions, therefore the rule does not apply since the emission unit meets the exemption in 10 CSR 10-6.400(1)(B)16.

$$E = 4.10 \left(10 \frac{\text{tons}}{\text{hr}} \right)^{0.67} = 19.18 \frac{\text{lb}}{\text{hr}}$$

EP-13 IR Building Heating System

The space heaters all use liquefied petroleum gas (propane), and therefore the rule does not apply because it meets the provisions of 10 CSR 10-6.400(1)(B)6 since it burns fuel for indirect heating.

EP-17 Phoenix Wood Cutting

The Phoenix Wood cutting operation is equipped with a fabric filter and the facility is required to operate and maintain the filter according to manufacturer's specifications. Construction Permit No.102012-014 requires the facility to monitor and record the pressure drop across the fabric filter at least once every 24 hours. If the facility maintains the fabric filters according to the requirements of Permit Condition 001 of this permit, this unit will have a controlled potential to emit 0.15 pounds per hour. This value is less than one-half (0.5) pounds per hours, so the emission point meets the exemption of 10 CSR 10-6.400(1)(B)12.

EP-18 Vinyl Cutting and Welding

The vinyl cutting and welding process has an uncontrolled potential to emit 0.03 pounds per hour. This value is less than 0.5 pounds per hour, therefore, making this rule not apply since the emission unit meets the exemption in 10 CSR 10-6.400(1)(B)12.

EP-25 Wood Paint Room Paint Booth

The wood paint room paint booth has a maximum hourly design rate of 0.6 gallons per hour with an emission factor of 2.56 pounds per gallon. The process is equipped with a fabric filter that has an overall control device efficiency of 96%. This rule does not apply because it meets the provisions of 10 CSR 10-6.400(1)(B)14. The provisions of the rule shall not apply to coating operations equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers' specifications or comparable maintenance procedures that meet or exceed manufacturers' specifications.

EP-27 Drilling, Grinding, and Punch Press

The drilling, grinding, and punch press processes have an uncontrolled potential to emit 0.35 pounds per hour. This value is less than 0.5 pounds per hour, therefore, making this rule not apply since the emission unit meets the requirements of 10 CSR 10-6.400(1)(B)12.

EP-28 Welders, Acetylene and O₂ Metal Cutting

The welding, acetylene and O₂ metal cutting processes have an uncontrolled potential to emit 0.02 pounds per hour. This value is less than 0.5 pounds per hour, therefore, this rule does not apply since the emission unit meets the exemptions in 10 CSR 10-6.400(1)(B)12.

EP-32 Debridge Thermal Fill

The debridge process is subject to the rule and has a controlled potential to emit 0.43 pounds per hour. Using the process weight equation in 10 CSR 10-6.400(3)(A)1, EP-32 has an allowable emission rate of 2.22 pounds per hour. The device is equipped with a cyclone with a fabric sock. By remaining in compliance with the Operational Limitations of Permit Condition 009, the permittee will be in compliance with the emission limitations of this rule.

$$E = 4.10 \left(0.4 \frac{\text{tons}}{\text{hr}} \right)^{0.67} = 2.22 \frac{\text{lb}}{\text{hr}}$$

EP-35 Aluminum Trimming

The Aluminum Trimming operation is equipped with dust collectors and the facility is required to operate and maintain the collectors according to manufacturer's specifications. Construction Permit No.102012-014 requires the facility to monitor and record the pressure drop across the dust collector at least once every 24 hours. If the facility maintains the dust collectors according to the requirements of Permit Condition 008 of this permit, this unit will have a controlled potential to emit 0.1 pounds per hour. This value is less than one-half (0.5) pounds per hours, so the emission point meets the exemption of 10 CSR 10-6.400(1)(B)12.

EP-36 Packing and Shipping

The packing and shipping operation is equipped with a fabric filter and the facility is required to operate and maintain the filter according to manufacturer's specifications. Construction Permit No.102012-014 requires the facility to monitor and record the pressure drop across the fabric filter at least once every 24 hours. If the facility maintains the fabric filters according to the requirements of Permit Condition 006 of this permit, this unit will have a controlled potential to emit 0.03 pounds per hour. This value is less than one-half (0.5) pounds per hours, so the emission point meets the exemption of 10 CSR 10-6.400(1)(B)12.

EP-40 – Pyrolysis Furnace

The pyrolysis furnace has an uncontrolled potential to emit 0.01 pounds per hour. This value is less than 0.5 pounds per hour, therefore, this rule does not apply since the emission unit meets the exemption in 10 CSR 10-6.400(1)(B)12.

EP-41A 5-Stage Wash System

The 5-stage wash system uses liquefied petroleum gas(propane), and therefore the rule does not apply because it meets the provisions of 10 CSR 10-6.400(1)(B)6 since it burns fuel for indirect heating.

EP-41B Dry Off Oven

The dry off oven uses liquefied petroleum gas(propane), and therefore the rule does not apply because it meets the provisions of 10 CSR 10-6.400(1)(B)6 since it burns fuel for indirect heating.

EP-41C Powder Cure Oven

The powder cure oven uses liquefied petroleum gas(propane), and therefore the rule does not apply because it meets the provisions of 10 CSR 10-6.400(1)(B)6 since it burns fuel for indirect heating.

EP-41D Make-Up Air System

The make-up air system has an uncontrolled potential to emit 0.02 pounds per hour. This value is less than 0.5 pounds per hour, therefore, this rule does not apply since the emission unit meets the requirements of 10 CSR 10-6.400(1)(B)12.

EP-41E Vinyl Cure Oven

The vinyl cure oven uses liquefied petroleum gas(propane), and therefore the rule does not apply because it meets the provisions of 10 CSR 10-6.400(1)(B)6 since it burns fuel for indirect heating.

EP-43 Debridge Cutting and Thermal Fill

The debridge process is subject to the rule and has a controlled potential to emit 0.86 pounds per hour. Using the process weight equation in 10 CSR 10-6.400(3)(A)1, EP-43 has an allowable emission rate of 3.23 pounds per hour. The device is equipped with a cyclone with a fabric sock. By remaining in compliance with the Operational Limitations of Permit Condition 009, the permittee will be in compliance with the emission limitations of this rule.

$$E = 4.10 \left(0.7 \frac{\text{tons}}{\text{hr}} \right)^{0.67} = 3.23 \frac{\text{lb}}{\text{hr}}$$

10 CSR 10-6.405, Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating

All equipment used for indirect heating located at the facility uses propane, therefore the installation is exempt from the rule per 10 CSR 10-6.405(1)(E).

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

Response to Public Comments

During the Public comment period, the Air Pollution Control Program received a few comments about the draft permit. Comments were submitted from Robert Cheever, of the Environmental Protection Agency, on April 14, 2015 via email to department staff. The comments are addressed in the order in which they appear within the letter(s).

Comment #1: Permit Condition PW001 establishes a voluntary emission limitation of less than 100 tons of volatile organic compounds (VOCs) in any consecutive 12-month period. **Permit Condition PW002** establishes voluntary emission limitations of less than 25 tons of any combination hazardous air pollutants (HAPs) in any 12-month consecutive period and less than a specific amount of certain individual hazardous air pollutants (HAPs) in any 12-month consecutive period, as shown in Table 1. Finally, **Permit Condition PW003** establishes an emission limitation on particulate matter less than ten microns in diameter (PM₁₀) from the entire installation in any consecutive twelve-month period. While the draft operating permit intends to restrict VOC, HAP, and PM₁₀ below the individual limits, these permit conditions are not enforceable as a practical matter. In its response to a petition against an operating permit issued to Hu Honua Bioenergy Facility, the Environmental Protection Agency granted the petitioners contention that the operating permit failed to ensure the enforceability as a practical matter because the permit was unclear whether all actual emissions were considered in determining compliance. Specifically, the permit failed to include emissions from malfunctions or upset conditions, although the permit did address start-up and shutdown emissions. Permit Condition PW001, PW002, and PW003, in the Quaker Window Products -- Freeburg draft operating permit, are unclear whether or not start-up, shutdown, malfunction and upset emissions are considered in the determination of compliance. In addition, it is unclear whether or not all emission units with the potential to emit VOC, HAPs, and PM₁₀ are included in the compliance determination. All three of these permit conditions require the use of Attachments A, B, C D, E, F, G, H, and I to accurately demonstrate compliance with the VOC and HAP and PM₁₀ emission limits from the “entire installation,” however, these permit conditions do not define the term “entire installation” with potential VOC, HAP and PM₁₀ emissions.

For purposes of determining the potential-to-emit (PTE) of a stationary source of VOCs, HAPs, and PM₁₀, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Thus, emissions for all emission units that are part of the source’s physical and operational design (entire installation) must be included in calculating PTE for purposes of determining VOC, HAP, and PM₁₀ emission limitation compliance, including emission units that have been designated as without limitations and any designated insignificant activities. Similarly, EPA has previously explained that when a source accepts a source-wide limit for a pollutant, all actual emissions of that (those) pollutant(s) from the source must be considered in determining compliance with the limit. **Section I** of the draft operating permit on public notice includes a listing “**Emission Units with Limitations**” which contains an Emission Unit EP-13. However, Emission Unit EP-13 is not included in Attachments A, B, C D, E, F, G, H, and I. Attachment C includes Emission Units EP-13A and EP-13B which EPA believes are the same, however, their listings are not consistent

so verification is not totally available. **Section I** also has “**Emission Units without Limitations**” and included in this listing are Emission Units EP-51 and EP-52 which EPA believes could contribute to the VOC, HAP, and/or PM₁₀ emission loading. Again, Emission Units EP-51 and EP-52 are not included in Attachments A, B, C D, E, F, G, H, and I. Finally, Attachment E includes Emission Units EP-22 and EP-23 which are not included in Section I.

EPA recommends MDNR revise Permit Condition PW001, PW002 and PW003, in the Intermediate State Permit to Operate for Quaker Window Products – Freeburg, to ensure the source-wide VOCs; the source-wide total HAPs and individual HAP and PM10 emission limits are enforceable. MDNR should identify all emission units subject to the site-wide limitations and clarify in the operating permit that those limits apply at all times, and that all actual source-wide emission units must be considered in determining compliance with those limits.

Response to Comment: The emissions calculations in Attachments A, B, C, D, E, F, G, H, and I assume emissions from start-up and shutdown are equivalent to emissions during normal operation. A place on the Attachments has been added for the facility to record any emissions that occurred during any malfunction. Emissions from malfunctions and upsets are required to be reported to the Air Pollution control Program’s Enforcement Section by 10 CSR 10-6.050.

Comment #2: The **Monitoring and Record keeping** requirement in **Permit Condition 002** and **Permit Condition 007** both say: “As Detailed in Section IV: Core Permit Requirements” These permit requirements, as written, are not enforceable from a practical matter. EPA’s guidance on practical enforceability defines practically enforceable as permit conditions which answer who, what, where, when, how and how often. Therefore, EPA recommends MDNR consider re-wording the monitoring and record keeping requirements in Permit Condition 002 and Permit Condition 007 to say: “Permittee shall conduct monitoring and record keeping in accordance with 10 CSR 10-6.220 as detailed in Section IV.”

Response to Comment: Previous wording has been replaced with the recommended wording of “Permittee shall conduct monitoring and recordkeeping in accordance with 10 CSR 10-6.220 as detailed in Section IV.”

Comment #3: The language regarding the written notification requirement for Off-Permit Changes in Section V used in operating permits has recently been modified to more closely match the wording in 10 CSR 10-6.065(5)(C)5. Therefore, EPA recommends MDNR use the newer Off-Permit Change wording in the Quaker Window Products -- Freeburg operating permit.

Response to Comment: Previous wording has been replaced with the new wording for the Off-Permit Changes in the permit.