



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

DEPARTMENT OF NATURAL RESOURCES

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FEB - 9 2016

Mr. Bruce Hildebrand
Regal Beloit America, Inc.
401 West Fremont Road
Lebanon, MO 65536

Re: Regal Beloit America, Inc., 105-0033
Permit Number: OP2015-018

Dear Mr. Hildebrand:

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 (APCP) 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

A handwritten signature in black ink that reads "Michael J. Stansfield". The signature is written in a cursive style with a large, stylized "S" at the end.

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

MJS/bjl

Enclosures

c: PAMS File: 2014-01-047



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: OP2015-018
Expiration Date: FEB - 9 2021
Installation ID: 105-0033
Project Number: 2014-01-047

Installation Name and Address

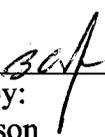
Regal Beloit America, Inc.
401 West Fremont Road
Lebanon, MO 65536
Laclede County

Parent Company's Name and Address

Regal Beloit America, Inc.
200 State Street
Beloit, WI 53511

Installation Description:

Regal Beloit America, Inc. operates an electric motor manufacturing plant in Lebanon, MO. It was previously known as Marathon Electric, Regal-Beloit Corp, and RBC Manufacturing Corp. The installation manufactures small electric motors. Regal Beloit America accepted limits on volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) to become a synthetic minor source.


Prepared by:
Bern Johnson
Operating Permit Unit


Director or Designee
Department of Natural Resources

FEB - 9 2016

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Regal Beloit America manufactures electric motors from 3 to 75 horsepower. Regal Beloit America is a synthetic minor source for Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). Regal Beloit America has accepted an emission limit of 100 tons per year (tpy) of VOCs and limits of 10 tpy of any individual and 25 tpy combined HAPs. Regal Beloit America is not a named source.

The installation's raw materials include aluminum ingots, steel, and surface coatings. The electric motor cover plates are made by melting the aluminum in propane-fired furnaces and pouring the molten aluminum into molds, cooled, and removed from the molds. The parts are shot-blasted as needed. The parts can be coated in the paint booths, which are equipped with fabric filters. The motor bodies are cast iron, which are received from offsite. The rotors are wound with wire, dipped in varnish, dried, and assembled. The installation also operates a propane-fired 0.7 mMBTU/hour Bayco oven, equipped with an afterburner, which incinerates varnish from paint booths.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM ₁₀)	1.08	0.22	0.22	0.22	3.36
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	1.04	0.21*	0.21*	0.03	0.36
Nitrogen Oxides (NO _x)	0.17	0.32	0.32	0.32	1.71
Sulfur Dioxide (SO ₂)	0.00	0.00	0.00	0.00	0.00
Volatile Organic Compounds(VOC)	6.25	8.02	8.02	8.02	12.62
Carbon Monoxide (CO)	0.14	0.27	0.27	0.27	0.23
Hazardous Air Pollutants (HAPs)	3.35	4.43	4.43	4.43	0.84

* - Beginning in 2012, reported PM_{2.5} was corrected using CEIDARS and AP-42 in MOEIS. These values do not represent a change in actual PM_{2.5} emissions.

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.

2012 EIQ Emission Point #	Description
EP1.1	Varnish Oven
EP2.1	Assembly Paint Booths
EP3.1	Small Assembly Paint Booth
EP4.1	Die Casters
EP6.1	Space Heaters (4)
EP10.1	Hot Drop Furnaces
EP13.1	Steel Welding Booth
EP14.1	Steel Welding Booth
EP17.1	Heat Cleaning (Burn Off) Oven
EP18.1	Aluminum Furnace
EP20.1	Shot Blaster
EP23.1	Aluminum Furnace
EP24.1	Aluminum Furnace
EP25.1	Assembly Paint Booth
EP28.1	Aluminum Furnace
EP30.1	Therm Paint Drying Oven
EP32.1	Small Paint Spray Booths
EP33.1	Paint Booth
EP34.1	Paint Booth

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.

2012 EIQ Emission Point #	Description
EP21.1	Winding Connect Torches

II. Plant Wide Emission Limitations

The installation shall comply with the following emission limitation. This condition applies to all emission points at the entire installation, including all those listed in Section I of this permit. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required

Construction Permit 032008-001

10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emissions Limitations:

- 1) The permittee shall emit less than 100 tons of VOCs from the entire installation in any period of 12 consecutive months. [Special Condition 2A]
- 2) The permittee shall emit less than 10 tons of each individual HAP from the entire installation in any period of 12 consecutive months. [Special Condition 2B]
- 3) The permittee shall emit less than 25 tons of any combination of HAPs from the entire installation in any period of 12 consecutive months. [Special Condition 2B]

Operation Limitation:

- 1) The permittee shall melt or process only clean metal (aluminum) that contains no visible oil or other organic contaminant. [Special Condition 5]

Monitoring/Recordkeeping:

- 1) The permittee shall calculate and record monthly and 12-month rolling emissions of VOCs, individual HAPs, and combined HAPs.
- 2) The permittee shall use Attachments E, F, and G, or their equivalents, to demonstrate compliance with the VOC and HAP limitations.
- 3) The permittee shall maintain all records required by this permit for not less than five years and shall make such records available to any Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the emission unit(s) exceeded the emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as 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.

PERMIT CONDITION 1		
10 CSR 10-6.060 Construction Permits Required Construction Permit # 1095-019 Issued October 11, 1995		
Emission Unit	Description	Manufacturer/Model #
EP17.1	Heat Cleaning (Burn Off) Oven – installed 1995	Bayco Model 56

Operational Limitation:

- 1) This installation shall not burn Teflon[®], chlorinated plastics, chlorinated solvents, trash, or hazardous waste material in the heat cleaning oven.
- 2) The installation may only burn off electric motor parts, hangers, and paint hooks that are generated on site.

Monitoring/Recordkeeping:

None.

Reporting:

- 1) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

PERMIT CONDITION 2		
10 CSR 10-6.060 Construction Permits Required Construction Permit 032008-001		
Emission Unit	Description	Manufacturer/Model #
EP1.1	Varnish Oven – 2.0 mmBTU/hr natural gas, installed 1980	Oven Systems Inc. Model OSI 2818
EP6.1	Four Dock Space Heaters – 1.6 mmBTU/hr natural gas total	
EP10.1	Hot Drop Furnace - 1.6 mmBTU/hr natural gas	
EP17.1	Heat Cleaning (Burn Off) Oven – installed 1995	Bayco Model 56
EP18.1	Aluminum Melt Furnace – 0.8 mmBTU/hr natural gas, installed 2007	Schaefer
EP23.1	Aluminum Melt Furnace – 0.8 mmBTU/hr natural gas, installed 1999	Schaefer
EP24.1	Aluminum Melt Furnace – 0.8 mmBTU/hr natural gas, installed 1999	Schaefer
EP28.1	Aluminum Melt Furnace – 0.8 mmBTU/hr natural gas, installed	Model 200 THT

Emission Unit	Description	Manufacturer/Model #
	2002	
EP30.1	Paint Drying Oven – 0.6 mmBTU/nr natural gas	
EP32.1	Small Paint Spray Booths (2) – installed 2007	Paasche
EP33.1	Paint Booth – installed 2007	Global
EP34.1	Paint Booth – installed 2008	Spray Systems, Inc

Emissions Limitations:

- 1) The permittee shall emit less than 15 tons of PM10 in any rolling 12-month period from the emission units listed [Special Condition 3A].

Monitoring/Recordkeeping:

- 1) The permittee shall calculate and record emissions of PM10 from these emission units on a rolling twelve-month basis. The records shall contain both the monthly and twelve-month rolling totals (see Attachment H).
- 2) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources’ personnel upon request.

Reporting:

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

PERMIT CONDITION 3		
10 CSR 10-6.060 Construction Permits Required Construction Permit # 032008-001 Issued March 5, 2008		
Paint Spray Booths		
Emission Unit	Description	Manufacturer/Model #
EP32.1	Small Paint Spray Booths (2) – installed 2007	Paasche
EP33.1	Paint Booth – installed 2007	Global
EP34.1	Paint Booth – installed 2008	Spray Systems, Inc

Operational Limitation:

- 1) The permittee shall operate fabric filters as control devices. The fabric filter shall be in operation any time the paint booths are in operation. [Special Condition 6A]

- 2) The permittee shall operate and maintain the fabric filters in accordance with the manufacturer's specifications. Replacement filters shall be kept on hand at all times. [Special Condition 6B]
- 3) The permittee shall maintain a copy of the manufacturer's specifications.
- 4) The fabric filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an operating and maintenance log (Attachment D or equivalent) for the filters which shall include the following:
 - i. incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions [Special Condition 6C1]; and
 - ii. maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 6C2]
- 2) The permittee shall monitor and record the operating pressure drop across the fabric filters at least once every 24 hours using Attachment J or equivalent. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty
- 3) The permittee shall maintain all records onsite for a minimum of five years and shall make them available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

PERMIT CONDITION 4		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations		
40 CFR 63 Subpart XXXXXX Area Source Standards for Nine Metal Fabrication and Finishing Source Categories		
Emission Unit	Description	Manufacturer & Model
EP13.1	Steel Welding Booth – Installed 1992	Miller/Model Deltaweld
EP14.1	Steel Welding Booth – Installed 1973 & 1975	Miller/Model CP-200 & CP-300

Operational Limitation:

- 1) The permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions [63.11516(f)(1)].
- 2) The permittee shall implement one or more of the following management practices to minimize emissions of metal fabrication HAPs (MFHAP), as practicable, while maintaining the required welding quality through the application of sound engineering judgment:
 - i. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)— also called metal inert gas welding (MIG)) [63.11516(f)(2)(i)];
 - ii. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates [63.11516(f)(2)(ii)];
 - iii. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation [63.11516(f)(2)(iii)];

- iv. Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated [63.11516(f)(2)(iv)]; or
- v. Use a welding fume capture and control system, operated according to the manufacturer’s specifications [63.11516(f)(2)(v)].

Conditional Operational Limitation:

- 1) If the permittee uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), it must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs 63.11516(f)(3) through (8) [63.11516(f)].

Monitoring/Recordkeeping

- 1) The permittee shall keep records of welding rod usage, calculated on a rolling 12-month basis (Attachment I or equivalent) [63.11516(f)].

Reporting:

- 1) The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

PERMIT CONDITION 5		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations		
40 CFR 63 Subpart XXXXXX Area Source Standards for Nine Metal Fabrication and Finishing		
Source Categories		
Emission Unit	Description	Manufacturer & Model
EP-20.1	Shot Blaster – installed 1957	Wheelabrator

Operational Limitation:

- 1) The permittee shall capture emissions and vent them to a filtration control device [§63.11516(a)(2)(i)].
- 2) The permittee shall operate the filtration control device according to manufacturer’s instructions [§63.11516(a)(2)(i)].
- 3) The permittee shall implement the management practices to minimize emissions of metal fabrication HAPs as specified:
 - i. the permittee shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable [§63.11516(a)(2)(ii)(A)];
 - ii. the permittee shall enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials [§63.11516(a)(2)(ii)(B)] ; and
 - iii. the permittee shall operate all equipment associated with dry abrasive blasting operations according to manufacturer’s instructions [§63.11516(a)(2)(ii)(C)].

Monitoring/Recordkeeping:

- 1) The permittee shall maintain a copy of the manufacturer’s specifications for the filtration control devices [§63.11519(c)(4)].

Reporting:

- 1) The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

PERMIT CONDITION 6		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart XXXXXX Area Source Standards for Nine Metal Fabrication and Finishing Source Categories		
Emission Unit	Description	Manufacturer & Model
EP32.1	2 Small Paint Spray Booths – installed 2007	Paasche

Operational Limitation:

- 1) The permittee shall maintain these two spray booths with a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths shall be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables [63.11516(d)(1)(i)].
- 2) The permittee shall maintain these two spray booths with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAPs [63.11516(d)(1)(ii)].
- 3) The permittee shall use a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Administrator, in these two spray booths [63.11516(d)(2)].
- 4) The permittee shall certify that all workers performing painting have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment [63.11516(d)(5)].
- 5) The permittee shall ensure that the cleaning of paint spray guns is done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used [63.11516(d)(4)].
- 6) The permittee shall ensure and certify that all new and existing personnel, including contract personnel, who spray paints are trained in the proper application of paints. The training program must include, at a minimum, the following:
 - i. a list of all current personnel by name and job description who are required to be trained [63.11516(d)(6)(i)];
 - ii. hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the following areas [63.11516(d)(6)(ii)]:

- A. spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate [63.11516(d)(6)(ii)(A)];
 - B. spray technique for different types of paints, if any, to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke [63.11516(d)(6)(ii)(B)];
 - C. routine spray booth and filter maintenance, including filter selection and installation [63.11516(d)(6)(ii)(C)]; and
 - D. environmental compliance with the requirements of this subpart [63.11516(d)(6)(ii)(D)].
- iii. a description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in this paragraph are not required to provide the initial training required by that paragraph to these painters [63.11516(d)(6)(iii)].
- 7) The permittee shall certify that all workers have completed the training requirements listed in paragraph 6 [63.11516(d)(5)].
- i. All personnel must be trained within 180 days of hiring [63.11516(d)(8)(ii)].
 - ii. Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years [63.11516(d)(9)].

Monitoring/Recordkeeping/

- 1) The permittee shall use a procedure to demonstrate filter efficiency that is consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see § 63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement [63.11516(d)(1)(ii)].
- 2) The permittee shall perform regular inspection and replacement of the filters in these spray booths according to manufacturer's instructions, and maintain documentation of these activities, as detailed in § 63.11519(c)(5), "Notification, recordkeeping, and reporting requirements." (using Attachment D or equivalent) [63.11516(d)(1)(iii)].
- 3) The permittee shall maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in § 63.11519(c)(7), "Notification, recordkeeping, and reporting requirements." [63.11516(d)(3)].
- 4) The permittee must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in § 63.11519(c)(8), "Notification, recordkeeping, and reporting requirements." [63.11516(d)(7)].

Reporting:

- 1) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

PERMIT CONDITION 7		
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants		
Sources Installed Before February 24, 1971		
Emission Unit	Description	Manufacturer & Model
EP-20.1	Shot Blaster – installed 1957	Wheelabrator

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from this emission unit any visible emissions with an opacity greater than 40%.
- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on 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 shall 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:

- 1) The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units;
 - b) All emission units from which visible emissions occurred;
 - c) Whether the visible emissions were normal for the process;
 - d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,

e) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

PERMIT CONDITION 8		
10 CSR 10-6.220 Restriction of Emissions of Visible Air Contaminants		
Sources Installed After February 24, 1971		
Emission Unit	Description	Manufacturer & Model
EP1.1	Varnish Oven – 2.0 mmBTU/hr natural gas, installed 1980	Oven Systems Inc. Model OSI 2818
EP2.1	Assembly Paint Booths (2) – installed 1998	JBI Model IBD-88F
EP3.1	Small Assembly Paint Booth – installed 1992	Devilbliss Model DFRL-6-7-125
EP6.1	Space Heaters (4)	na
EP10.1	Hot Drop Furnaces – 1.6 mmBTU/hr natural gas	na
EP13.1	Steel Welding Booth – Installed 1992	Miller/Model Deltaweld
EP14.1	Steel Welding Booth – Installed 1973 & 1975	Miller/Model CP-200 & CP-300
EP17.1	Heat Cleaning (Burn Off) Oven – 0.7 mmBTU/hr, installed 1995	Bayco Model 56
EP18.1	Aluminum Melt Furnace – installed 2007	Schaefer
EP23.1	Aluminum Melt Furnace – installed 1999	Schaefer
EP24.1	Aluminum Melt Furnace – installed 1999	Schaefer
EP25.1	Assembly Paint Booth – installed 2001	Lincoln 2001
EP28.1	Aluminum Melt Furnace – installed 2002	Model 200 THT
EP30.1	Paint Drying Oven – installed 2003	Therm
EP32.1	Small Paint Spray Booths (2) – installed 2007	Paasche
EP33.1	Paint Booth – installed 2007	Global
EP34.1	Paint Booth – installed 2008	Spray Systems, Inc.

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20%.

- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on 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:

- 1) The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units;
 - b) All emission units from which visible emissions occurred;
 - c) Whether the visible emissions were normal for the process;
 - d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
 - e) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.
- 2) There are no monitoring requirements for emission units EP1.1, EP6.1, EP10.1, EP17.1, and EP30.1 (see Statement of Basis).

Reporting:

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

PERMIT CONDITION 9		
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds		
Emission Unit	Description	Manufacturer/Model #
EP4.1e	Die casting machine #6; Installed 1989	THT/1749
EP4.1f	Die casting machine #5; Installed 1995	THT/2051
EP4.1g	Die casting machine #7; Installed 1989	200 THT/1743
EP4.1m	Die casting machine #13; Installed 2001	200THT/1743

Emission Limitation:

- 1) The permittee shall not permit emissions greater than 500 parts per million by volume (ppmv) of sulfur dioxide.
- 2) The permittee shall not permit emissions greater than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain a record of the calculations that demonstrate the units listed are always in compliance (See Statement of Basis). No other monitoring is required.
- 2) The permittee shall maintain all records onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

PERMIT CONDITION 10		
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes		
Emission Unit	Description	Manufacturer/Model #
EP2.1	Assembly Paint Booths (2) – installed 1998	JBI Model IBD-88F
EP3.1	Small Assembly Paint Booth – installed 1992	Devilbiss Model DFRL-6-7-125
EP34.1	Paint Booth – installed 2008	Spray Systems, Inc.

Operational Limitation:

- 1) The permittee shall not operate these emission units without fabric filters in place.
- 2) The permittee shall operate the fabric filters in accordance with manufacturer's instructions. The permittee shall maintain a copy of the manufacturer's specifications.
- 3) The permittee shall keep replacement filters on hand.

Monitoring:

- 1) The permittee shall inspect filters for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 2) The permittee shall inspect filters each shift before spraying begins in a booth and after installation of a new filter.

- 3) The fabric filter shall be equipped with a gauge or meter, which indicates the pressure drop across the control device.
- 4) The permittee shall monitor and record the operating pressure drop across the fabric filters at least once every 24 hours using Attachment J or equivalent. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty
- 5) The permittee shall follow the manufacturer's recommendations with regard to installation and frequency of replacement of the filters.

Record Keeping:

- 1) The permittee shall maintain a log of fabric filters maintenance and inspections, including when they occur (see Attachment D or equivalent).
- 2) The permittee shall maintain all records onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report 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 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 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 10-6.170 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 10-6.165 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 10-6.250 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.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with 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*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065, §(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. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 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, Compliance and 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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Bruce Hildebrand, Plant Manager. 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 C

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 _____

ATTACHMENT E
VOC Compliance Worksheet

This worksheet covers the period from _____ to _____
(month/year) (month/year)

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsVOC/unit)	³ Total Monthly Emissions (tons/month)
EP1.1	Varnish Oven		tons varnish	507.89	
EP2.1	Assembly Paint Booths		gal	1.74	
EP3.1	Small Assembly Paint Booth		gal	1.74	
EP4.1	Die Casters		tons Al	0.14	
EP18.1	Aluminum Furnace		tons Al	0.2	
EP23.1	Aluminum Furnace		tons Al	0.2	
EP24.1	Aluminum Furnace		tons Al	0.2	
EP25.1	Assembly Paint Booth		gal	1.74	
EP28.1	Aluminum Furnace		tons Al	0.2	
EP32.1	Small Paint Spray Booths		gal	2.13	
EP33.1	Paint Booth		gal	3.43	
EP34.1	Paint Booth		gal	1.74	
EP-6.1	natural gas usage	1.13 (max)	mmft ³	5.3	0.003
⁵ Total Monthly Installation-Wide VOC Emissions (tons)					
⁶ Total 12-Month Rolling Installation-Wide VOC Emissions (tons)					

¹ Enter total amount of material (indicated in the next column) used in month.

² Emission factor sources are MSDS for paint booths, using the highest VOC content if different coatings are used; mass balance worksheet for EP1.1; and WebFIRE for all others.

³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

⁴ Potential natural gas emissions are 1152 mmBTU/month / 1020 mmft³/mmBTU * 5.3 lbs VOC/mmft³ * 0.0005 tons/lb = 0.003 tons VOC/month

⁵ Total installation emissions are the sum of the total monthly emissions for each emission point.

⁶ 12-Month Rolling VOC Emissions = Sum of twelve most recent Combined VOC Compliance Worksheets.

12-Month Rolling Total VOC Emissions less than 100 tons/yr indicates compliance.

Attachment F

Combined HAPs Compliance Worksheet

This worksheet covers the period from _____ to _____
 (month/year) (month/year)

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsHAP/unit)	³ Total Monthly Emissions (tons/month)
EP13.1	E70S electrode		1000 lbs	0.001 lb Cr	
				0.001 lb Co	
				0.318 lb Mn	
				0.001 lb Ni	
EP14.1	E70S electrode		1000 lbs	0.001 lb Cr	
				0.001 lb Co	
				0.318 lb Mn	
				0.001 lb Ni	
EP32.1	two paint booths		gal	0.017 lbs ethylbenzene	
				0.017 lbs naphthalene	
				0.281 lbs Cr	
				0.094 lbs xylene	
EP-6.1	natural gas usage	1.13 (max)	mmft^3	1.8885 lbs HAP	0.001
⁵Total Monthly Installation-Wide HAP Emissions (tons)					
⁶Total 12-Month Rolling Installation-Wide HAP Emissions (tons)					

¹ Enter total amount of material (indicated in the next column) used in month.
² Emission factor sources are MSDS for paint booths, using the highest HAP content if different coatings are used; and WebFIRE for all others.
³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.
⁴ Potential natural gas emissions are 1152 mmBTU/month / 1020 mmft^3/mmBTU * 1.8885 lbs HAP/mmft^3 * 0.0005 tons/lb = 0.001 tons combined HAPs/month
⁵ Total installation emissions are the sum of the total monthly emissions for each emission point.
⁶ 12-Month Rolling HAP Emissions = Sum of twelve most recent Combined HAPs Compliance Worksheets.

12-Month Rolling Total Combined HAP Emissions less than 25 tons/yr indicates compliance.

Attachment G
 Individual HAP Compliance Worksheet

HAP Name: _____ CAS No.: _____

This worksheet covers the period from _____ to _____
 (month/year) (month/year)

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsHAP/ unit)	³ Total Monthly Emissions (tons/month)
EP-6.1	natural gas usage	1.13 (max)	mmft ³	1.8885 lbs HAP	0.001
⁵Total Monthly Installation-Wide HAP Emissions (tons)					
⁶Total 12-Month Rolling Installation-Wide HAP Emissions (tons)					

¹ Enter total amount of material (indicated in the next column) used in month. Note: emission point, description, unit, and emission factors are found in Attachment F.

² Emission factor sources are MSDS for paint booths, using the highest HAP content if different coatings are used; and WebFIRE for all others.

³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

⁴ Potential natural gas emissions are 1152 mmBTU/month / 1020 mmft³/mmBTU * 1.8885 lbs HAP/mmft³ * 0.0005 tons/lb = 0.001 tons HAPs/month

⁵ Total installation emissions are the sum of the total monthly emissions for each emission point.

⁶ 12-Month Rolling HAP Emissions = Sum of twelve most recent Individual HAP Compliance Worksheets.

12-Month Rolling Total Individual HAP Emissions less than 10 tons/yr indicates compliance.

Attachment H
PM10 – 032008-001 Compliance Worksheet

This worksheet covers the period from _____ to _____
(month/year) (month/year)

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbsPM10/unit)	Capture & Control Efficiencies	³ Total Monthly Emissions (tons/month)
EP-1.1	Varnish Oven		tons	10.09	89%	
EP-18.1	Aluminum Melt Furnace		tons	2.60	0%	
EP-23.1	Aluminum Melt Furnace		tons	2.60	0%	
EP-24.1	Aluminum Melt Furnace		tons	2.60	0%	
EP-28.1	Aluminum Melt Furnace		tons	2.60	0%	
EP-32.1	Can Spray Paint Booths		gal	6.37	89%	
EP-33.1	Paint Booth		gal	3.97	89%	
EP-34.1	Paint Booth		gal	4.07	89%	
⁴ EP-6.1	natural gas usage	1.13	mmft ³	8.7	0%	0.002
⁴ EPs-1.1, 10.1, 17.1, 18.1, 23.1, 24.1, 28.1, & 30.1	natural gas usage	5.72	mmft ³	3.0	0%	0.009
⁵Total Monthly PM10 032008-001 Emissions (tons)						
⁶Total 12-Month Rolling PM10 032008-001 Emissions (tons)						

¹ Enter total amount of material (indicated in the next column) used in month.

² Emission factor sources are MSDS for paint booths, using the highest solids content if different coatings are used; and WebFIRE for all others.

³ Total monthly emissions = Monthly Usage * Emission Factor * (1-Control Efficiency) * 0.0005. The transfer efficiency of spray booths is included in the emission factor.

⁴ Potential natural gas emissions are 1152 mmBTU/month / 1020 mmft³/mmBTU * 8.7 lbs PM10/mmft³ * 0.0005 tons/lb = 0.002 tons PM10/month for EP-6.1; and 5832 mmBTU/month / 1020 mmft³/mmBTU * 8.7 lbs PM10/mmft³ * 0.0005 tons/lb = 0.009 tons PM10/month for all other emission points.

⁵ Total installation emissions are the sum of the total monthly emissions for each emission point.

⁶ Total 12-Month Rolling PM10 032008-001 Emissions = Sum of twelve most recent PM10 – 032008-001 Compliance Worksheets.

12-Month Rolling Total Individual PM10 Emissions less than 15 tons/yr indicates compliance

ATTACHMENT I
Welding Rod Usage Worksheet

Month/Year _____

Emission Point	Description	¹ Welding Rod type	² Monthly Usage (tons)
EP13.1	Steel Welding Booth		
EP14.1	Steel Welding Booth		
³ Total Welding Rod Usage			
⁴ Total welding rod usage for 12-month rolling			

¹List welding rods that contain “compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead.” [63.11514(b)]

²Monthly Usage may be calculated by purchase invoices.

³Total Welding Rod Usage is the sum of the total monthly emissions for each emission point.

⁴Total 12-Month Rolling Welding Rod Usage = sum of twelve most recent Welding Rod Usage Worksheets.

12-Month Rolling Total Welding Rod Usage more than 2,000 tons/yr results in additional requirements in 63.11516(f)(3)-(8).

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.

On March 17, 2014, the installation's name was formally changed from RBC Manufacturing Corporation to Regal Beloit America, Inc. The facility ID remains the same (105-0033) and all applicable permits and actions remain in effect.

Since the permit renewal process started, two emission units were removed: EP4.1h die casting machine #8 and EP19.1 electric mold repair oven. EP19.1 was the largest source of VOC emissions at over 1500 tpy. Potential-to-emit calculations were double-checked after this decrease to verify that the installation was still a major source for VOCs.

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 January 24, 2014;
- 2) Intermediate Operating Permit OP2009-022, Issued August 7, 2009;
- 3) Construction Permit 1192-007, Issued November 9, 1992;
- 4) Construction Permit 1095-019, Issued October 11, 1995;
- 5) Construction Permit 1098-009, Issued September 11, 1998;
- 6) Construction Permit 0199-028, Issued November 4, 1998;
- 7) Construction Permit 122001-002, Issued November 19, 2001;
- 8) Construction Permit 092002-001, Issued April 15, 2002,
- 9) Construction Permit 062004-018, Issued June 29, 2004;
- 10) Construction Permit 032008-001, Issued March 5, 2008;
- 11) 2013 Emissions Inventory from MOEIS, received March 28, 2014;
- 12) WebFIRE; and
- 13) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes* – the installation indicated in the application that 6.400 did not apply. There are four units that are subject to 6.400; however, they have been given a conditional exemption (see Permit Condition 10) since their controlled PTEs are less than the calculated emission limit (see Other Regulatory Determinations for calculations).

40 CFR Part 63 Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* – the installation indicated in the application that EP13.1, 14.1, and 20.1 were subject to this Subpart. During the permit writing process, the Air Program determined that EP32.1 was also subject to this Subpart (see MACT Applicability section for more information).

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.

Construction Permit History

The following revisions were made to construction permits for this installation:

Construction Permits 1192-007 and 0199-028 – these permits were issued for the installation of three paint booths and two die casting machines. All special conditions for these two permits were superseded by CP 032008-001.

Construction Permit 1098-009 – this permit was issued for the installation of an incinerator. The incinerator was never installed. Therefore the special conditions of this permit do not apply.

Construction Permits 122001-002, 092002-001, and 062004-018 – the only condition in these three permits is that the installation shall only melt or process clean metal, i.e. that contains no visible oil. This condition is repeated in CP 032008-018. Due to these overlapping requirements, the three permits listed are not incorporated by reference into this operating permit.

Construction Permit 032008-001 – this permit was issued for the installation of four paint booths and a shot blaster, and a fuel switch from propane to natural gas. Four emission points listed in this permit have been permanently removed and are not listed in this table: EP-21.1, -26.1, -31.1, and -35.1 [Special Condition 3].

New Source Performance Standards (NSPS) Applicability

None

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart RRR — *National Emission Standards for Hazardous Air Pollutants Secondary Aluminum Production* – this subpart applies to some secondary aluminum production processes. The requirements of this subpart do not apply to manufacturers of aluminum die castings, aluminum foundries, or aluminum extruders that melt no materials other than clean charge and materials generated

within the installation; and that also do not operate a thermal chip dryer, sweat furnace or scrap dryer/delacquering kiln/decoating kiln. Regal Beloit America uses only equipment specifically exempted. Therefore, Subpart RRR does not apply to this installation.

40 CFR Part 63 Subpart MMMM — *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* – this subpart applies to the surface coating of a wide variety of metal products at major sources of HAPs. Regal Beloit America is a synthetic minor source due to a plantwide limit on HAP emissions. Therefore, Subpart MMMM does not apply to this installation.

40 CFR Part 63 Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* – this subpart applies to various spray booth operations at area sources of HAPs. The only emission unit that would be subject to Subpart HHHHHH is EP32.1. EP32.1 is also subject to Subpart XXXXXX, which exempts affected sources from Subpart HHHHHH. Therefore, Subpart HHHHHH does not apply to this installation.

40 CFR Part 63 Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* – this subpart applies to area sources that are primarily engaged in any of nine source categories. Regal Beloit America manufactures electric motors and components, which qualify under §63.11514(a)(2) Fabricated Metal Products. This subpart applies to three areas of Regal Beloit America's Lebanon installation: two steel welding units (EP13.1 & 14.1), shot blasting (EP20.1), and two paint booths (EP32.1). All three areas use materials that contain one or more metal fabrication HAPs in percentages greater than those specified in the Subpart.

- steel welding units – annual throughput is less than 2,000 lbs/year. If throughput ever exceeds 2,000 lbs/year, there are significant additional requirements such as visible emissions monitoring.
- visible determination of fugitive emissions [63.11517] – these requirements are the same as those required by 10 CSR 10.6.220. Therefore, they are not repeated in Permit Conditions 4,5, & 6.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Other Regulatory Determinations

- 1) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* – this rule applies to sources of visible emissions. Historically, the electric motors manufacturing plant in Lebanon has not emitted visible emissions while under normal operation. Though this rule applies to emission units

EP-1.1, -6.1, -10.1, -17.1, and -30.1, their only emissions are from combustion of natural gas. However, monitoring and recordkeeping are not applied to these natural gas-fired units because visible emissions are not expected when these units are properly maintained and operated.

- 2) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* – this rule establishes a maximum allowable concentration of sulfur compounds of 500 ppmv SO₂ and 35 mg/m³ of SO₃/sulfuric acid. It applies to the die casting machines (EP4.1e, f, g, and m). The following calculations demonstrate that these units are incapable of exceeding these limits.

EP4.1e, f, and g:

Maximum hourly design rate = 0.125 ton/hr
 SO₂ emission factor = 0.02 lbs/ton (WebFIRE – SCC: 3-04-001-14)
 Stack gas flow rate = 55,000 cf/min
 Stack gas temperature = 90°F
 Atmospheric Pressure = 14.7 lbs/in²
 SO₂ emission = 0.125 tons/hr x 0.02 lb/ton = 0.0025 lbs/hr

PPMv SO₂ = [lbs SO₂/hr x Specific volume SO₂(ft³/lb) x 10⁶] ÷ [flow rate(acfm) x 60 min/hr]

$$SO_{2(ppmv)} = \frac{\left(0.0025 \frac{lbs}{hr}\right) \times \left(1545 \frac{ft \cdot lb}{mole \cdot R}\right) \times \left((460 + 90^\circ F)^\circ R\right) \times 10^6}{\left(64 \frac{lbs}{mol}\right) \times \left(14.7 \frac{lbs}{in^2}\right) \times \left(144 \frac{in^2}{ft^2}\right) \times \left(55,000 \frac{ft^3}{min}\right) \times \left(60 \frac{min}{hr}\right)} = 0.00475 ppmv$$

and

mg/m³ = ppm * MW / 24.45; MW SO₃ = 80; 1 mole SO₂ = 1 mole SO₃

$$SO_3 \text{ Concentration} = 0.02 \frac{mg}{m^3} \text{ (assuming all SO}_2 \text{ is converted to SO}_3\text{/sulfuric acid)}$$

EP4.1m:

Maximum hourly design rate = 0.15 ton/hr
 SO₂ emission factor = 0.02 lbs/ton (FIRE – SCC: 3-04-001-14)
 Stack gas flow rate = 200,000 cf/min
 Stack gas temperature = 90°F
 Atmospheric Pressure = 14.7 lbs/in²
 SO₂ emission = 0.15 tons/hr x 0.02 lb/ton = 0.003 lbs/hr

PPMv SO₂ = [lbs SO₂/hr x Specific volume SO₂(ft³/lb) x 10⁶] ÷ [flow rate(acfm) x 60 min/hr]

$$SO_{2(ppmv)} = \frac{\left(0.003 \frac{lbs}{hr}\right) \times \left(1545 \frac{ft \cdot lb}{mole \cdot R}\right) \times \left((460 + 90^\circ F)^\circ R\right) \times 10^6}{\left(64 \frac{lbs}{mol}\right) \times \left(14.7 \frac{lbs}{in^2}\right) \times \left(144 \frac{in^2}{ft^2}\right) \times \left(200,000 \frac{ft^3}{min}\right) \times \left(60 \frac{min}{hr}\right)} = 0.00157 ppmv$$

and

$\text{mg/m}^3 = \text{ppm} * \text{MW} / 24.45$; MW $\text{SO}_3 = 80$; 1 mole $\text{SO}_2 = 1$ mole SO_3

$$\text{SO}_3 \text{ Concentration} = 0.01 \frac{\text{mg}}{\text{m}^3} \text{ (assuming all SO}_2 \text{ is converted to SO}_3\text{/sulfuric acid)}$$

The limits in the rule are 500 ppm SO_2 and 35 mg/m^3 sulfuric acid or sulfur trioxide, or any combination of these gases. The PTE for each unit is well below these limits. Therefore, each of these emission units is in compliance.

Natural gas combustion is exempt under 10 CSR 10-6.260(1)(A)(2).

- 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes* – this rule limits the amount of particulate matter that is allowed from an emission unit. There are sixteen specific exemptions in the rule. Most of REGAL BELOIT AMERICA’s emission units fall under one or more of these exemptions (see table below). The definition of process weight rate excludes liquids and gases used solely as fuels.

Table 1 – 10 CSR 10-6.400(12) Exempt Units

Emission Unit No.	MHDR	Emission Factor	Source	PTE
EP13.1	0.0017 1000 lbs	5.20 lbs/1000 lbs	WebFIRE	0.001 lbs/hr
EP14.1	0.009 1000 lbs	5.20 lbs/1000 lbs	WebFIRE	0.05 lbs/hr
EP32.1	0.041 gal	6.37 lbs/gal	MSDS	0.26 lbs/hr

Three emission units (EP2.1, 3.1, and 34.1) are conditionally exempt under the conditions stated in Permit Condition 10, i.e. to operate these units with a control device. If operated with properly maintained fabric filters, these two units would be exempt under (1)(B)(15).

Emission points EP-1.1, 6.1, 10.1, 17.1, 21.1, and 30.1 are exempt under (1)(B)(16) because they use only natural gas.

Particulate Emissions Calculations

All four units listed in Table 2 are below 60,000 lbs/hr process weight each. The following equation from 10 CSR 10-6.400(3)(A)1 is used to calculate maximum allowable particulate emissions:

Maximum Allowable PM Emissions $E = 4.1(P)^{0.67}$

P = Process weight rate (tons/hr i.e. MHDR)
 E = Allowable emission rate limit (lb/hr)

Table 2 – Determination of 10 CSR 10-6.400 PM limit

Emission Unit	MHDR (per hour)	Allowable Emission Rate (lbs/hr)	Emission Factor (lbs/ton)	PTE (lbs/hr)
EP18.1	0.175 tons	1.28	4.3	0.75
EP23.1	0.25 tons	1.62	4.3	1.08
EP24.1	0.25 tons	1.62	4.3	1.08
EP28.1	0.165 tons	1.23	4.3	0.71

These calculations demonstrate that these four units are always in compliance with 10 CSR 10-6.400. Emission factor from WebFIRE for SCC 30400103 - PM

4. Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹	HAP	Potential to Emit (tons/yr) ¹
CO	0.14	Ethylbenzene	2.48
HAP	35.12	Glycol Ethers	16.15
NO _x	0.73	Isopropylbenzene	0.32
PM ₁₀	55.81	Naphthalene	0.66
PM _{2.5}	55.81	Toluene	0.38
SO _x	0.10	Triethylamine	5.84
VOC	131.52	Xylene	9.28

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. PTE does not include emission limits in any Permit Condition from this document.

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).

MEMORANDUM

DATE:

TO: 2014-01-047

FROM: Michael J. Stansfield, Operating Permit Unit

SUBJECT: Response to Public Comments

A draft of the Intermediate Operating Permit for Regal Beloit America, Inc was placed on public notice on February 13, 2015, by the Missouri Department of Natural Resources (MDNR). Comments were received from Robert Cheever of Region VII of the Environmental Protection Agency. The five 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 PW001 also establishes voluntary emission limitations of less than 10 tons of any individual hazardous air pollutant (HAP) in any 12-month consecutive period and less than 25 tons of any combination of hazardous air pollutants (HAPs) in any 12-month consecutive period. Permit Conditions PW001 approves the use of Attachment E, F, G, and H to accurately demonstrate compliance with the VOC and HAP voluntary limits. While the draft operating permit intends to restrict VOC and HAP below the individual voluntary limits, these limits are not enforceable as a practical matter.

To effectively limit Regal Beloit -- Lebanon VOC, individual HAP and total HAP emissions to less than 100, 10 and 25 tpy, respectively, as specified, the VOC, individual and total HAP emission limits of Permit Condition PW001 must apply at all times to all actual emission units, and all actual VOC, individual and total HAP emission units must be considered in determining compliance with the respective limits. However, the draft permit is unclear whether all actual VOC; individual HAP; and total HAP emissions must be considered in determining compliance with these limits.

For purposes of determining the potential-to-emit (PTE) of a stationary source of VOCs and HAPs, the PTE shall encompass the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Thus, emission 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 and HAP

voluntary 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.

EPA recommends MDNR revise Permit Condition PW001 in the Intermediate State Permit to Operate for Regal Beloit -- Lebanon to ensure the source-wide VOCs; the source-wide total HAPs and individual HAP emission limits of 100 tons per 12-month period; 25 tons per 12-month period and 10 tons per 12-month period, respectively, 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 to all actual source-wide VOC; total HAP and individual HAP emissions and that all actual VOC; total HAP and individual HAP emission units must be considered in determining compliance with those limits.

Response to Comment:

Section II – Plantwide Emission Limitations applies to all emission points at the installation, including all those listed in the Emission Units with Limitations and Emission Units without Limitations tables in Section I. To clarify the intent of Section II, the following sentence was added to the section heading – “This condition applies to all emission points at the entire installation, including all those listed in Section I of this permit.”

Comment #: 2

Permit Condition 8 includes a monitoring / record keeping requirement that says “As required in Section IV. Core Permit Requirements.” This requirement is not practically enforceable, as written, as it fails to answer the “who,” “what,” “where,” “when,” “how,” and “how often.” EPA recommends MDNR consider modifying the monitoring / record keeping requirement 1, in Permit Condition 8, to say “The permittee shall conduct monitoring and maintain records in accordance with 10 CSR 10-6.220 as detailed in Section IV; Core Permit Requirements.”

Response to Comment:

The suggested text was added to Monitoring requirement 1.

Comment #: 3

Permit Conditions 3, 4, 5, and 6 require the permittee to monitor, record and maintain operating, maintenance and inspection logs. MDNR’s customary practice is to include examples of the various data collection records used by the permittee to verify compliance as attachments to the operating permit. However, there are no attachments included for the record keeping requirements of Permit Conditions 3, 4, 5, and 6. Therefore EPA recommends MDNR modify these permit conditions to include appropriate record keeping examples as attachments.

Response to Comment:

An additional attachment (I) was added as an example to record welding rod usage. The Monitoring/Reporting paragraphs were updated to include references to existing forms in the attachments as appropriate.

Comment #: 4

Permit Condition 6 requires the permittee to conduct training to individuals in the proper application of paints in their paint spray booths. The standards are well detailed and include the requirement to certify that all workers have completed the initial and refresher training. However, there is no requirement in the draft operating permit for the permittee to maintain any training records. MDNR's customary practice is to include examples of the various data collection records used by the permittee to verify compliance as attachments to the operating permit. Therefore EPA recommends MDNR modify Permit Condition 6 to include appropriate training record keeping and an example of the record as an attachment.

Response to Comment:

A requirement to maintain training records was added to the Monitoring/Reporting paragraph.

Comment #: 5

Regal Beloit – Lebanon is shown as subject to 40 CFR Part 63, Subpart XXXXXX; Area Source Standards for Nine Metal Fabrication and Finishing Source Subcategories. According to the MDNR Area Source Standards website, the EPA is the regulating agency for 40 CFR Part 63, Subpart XXXXXX. However, the compliance notification and reporting included in **Permit Condition 4, 5, and 6** requires the permittee to submit compliance reports to MDNR. EPA contends that if the EPA is responsible for compliance, then the EPA should be the primary recipient of the compliance notifications and reports; with MDNR receiving duplicate copies. Therefore, EPA recommends MDNR add specific clarifying language into these permit condition to show EPA as the primary compliance information recipient and MDNR as secondary related to Permit Conditions 4, 5, and 6.

Response to Comment:

The Reporting paragraphs for these three conditions was modified to identify EPA Region VII as the primary recipient of compliance notification reports, with a copy sent to MDNR.