

PERMIT BOOK

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **022016-009** Project Number: 2015-02-053
Installation Number: 510-2236

Parent Company: RBF Office Interiors

Parent Company Address: 5055 Natural Bridge Road, St. Louis, Missouri 63115

Installation Name: Remanufactured Business Furniture - St. Louis

Installation Address: 5055 Natural Bridge Road, St. Louis, Missouri 63115

Location Information: St. Louis City

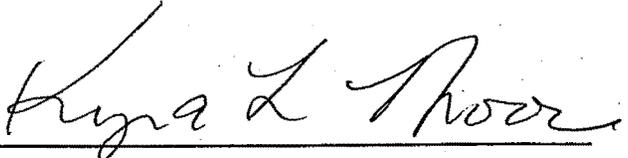
Application for Authority to Construct was made for:

The installation of a furniture re-finishing operation including solvent wipe-down, primer coating, base coating, adhesive sprays (upholstery and metal surfaces), and a wood shop. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

FEB 16 2016

EFFECTIVE DATE



DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources' regional office responsible for the area within which you are located within 15 days after the actual start up of these air contaminant sources.

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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SPECIAL CONDITIONS:

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

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

**Remanufactured Business Furniture - St. Louis
St. Louis City**

1. **Approved Classes of Coatings, Adhesives, and Solvents**
A table of coatings used in operations was submitted by Remanufactured Business Furniture – St. Louis. The SDS for each coating was reviewed, and then all coatings were classified by pollutant characteristics and densities. The coatings are classified as shown in Table 1.

Table 1: Coating Classifications & Maximum Pollutant Contents

Classification Reference No. and Name	Maximum Density of Class (lb/gal)	Maximum VOC Content of Class (lb/gal)	Maximum Solids Content (lb/gal)	**HAPs?
1) Non-metallic, Water-based Enamels	10.51	0.55	3.37	No
2) Glossy, Water-based Enamels	9.35	0.86	2.99	No
3) Metallic, Water-based Enamels	9.46	1.03	2.84	Yes
4) Primers	10.49	4.46	6.03	Yes
5) Solvents & Reducers	7.49	7.49	0.00	Yes
6) Adhesives	10.00	7.62	2.38	Yes
Special Classes*	--	--	--	--
7) Polane Product Line*	14.12	5.56	9.03	Yes
8) Edgebanding Hot Melt*	9.10	0.08	n/a	No
9) Fast-Dry, Acrylic Enamels	8.18	4.80	2.62	Yes
10) Powder Coating Base	14.61	0.00	14.61	No

*These classes may only be modified through an approved construction permit amendment.

**The complete list of HAPs for each coating is unique, so no value can be applied to the entire class; the exact values must be obtained from each SDS for all HAPs within each product.

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SPECIAL CONDITIONS:

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

2. **Alternative Coating Self-Assessment**
 - A. When considering the use of a coating material that has not been included in this permit, the alternative coating material shall be assessed prior to use in any of the spray guns. Remanufactured Business Furniture - St. Louis shall calculate the potential emissions of all individual hazardous air pollutants (individual HAPs), combined HAPs, and total PM_{2.5} content.
 - B. Remanufactured Business Furniture - St. Louis shall seek approval from the Air Pollution Control Program before use of the alternative material if the potential emissions of *any* individual HAP is greater than or equal to its respective screening model action level (SMAL), or if the potential emissions of combined HAPs is greater than or equal to 14.31 tons per year, or if the potential emissions of PM_{2.5} exceed 9.03 tons per year (after application of 65% or 95% transfer efficiency and 95% or 99% control efficiency has been applied—depending on the type of gun and filter being used).
 - C. Attachment A or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program, shall be used to demonstrate compliance with Special Condition 2.A and 2.B. SMALs are available in Appendix B, or an updated version may be found after changes have been published on the program’s online resources.

3. **Annual Emission Limit – Volatile Organic Compounds**
Remanufactured Business Furniture - St. Louis shall emit less than 40.0 tons of VOCs in any consecutive 12-month period of time from the entire installation. An electronic form, approved by the Air Pollution Control Program, shall be used to demonstrate compliance with the voluntary limit of this Special Condition. The installation is defined in Table 2.

Table 2: Installation Emission Points (to include in emissions tracking):

Emission Point Designation	Description
EP-02	Primer Station
EP-03a, -03b, -03c	Base Coating (non-powder)
EP-03d	Adhesive Spraying (metal tops)
EP-04	Base Coating (powder)
EP-05	Adhesive Spraying (upholstery)
EP-06	Wood Shop (edgebanding)

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SPECIAL CONDITIONS:

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

4. Capture Device Requirement – Spray Booths
Remanufactured Business Furniture - St. Louis shall capture emissions from surface coating using booths (EP-02, EP-03a, EP-03b, EP-03c, EP-03d) with not more than 1 inlet face opening (e.g. 3-sided or totally enclosed booth), and from powder coating operations using a booth (EP-04) that is fully enclosed.
 - A. All coatings shall be applied inside the booth and sprayed in a direction away from the inlet face opening, if present. Where a fully enclosed booth is used, all sides must be closed before operating the spray gun.
 - B. The inlet face opening, if present, shall be equipped with a visual indicator, such as streamers, that show air flow into the booth whenever surface coating is being applied. Where a fully enclosed booth is used, no indicator is necessary.
 - C. Inward air velocity shall be maintained at least 100 fpm at all points across the inlet face opening, if present.
 - 1) Air velocity shall be monitored and recorded at initial startup.
 - 2) Air velocity shall be monitored and recorded once per calendar quarter following initial startup.
 - 3) Each monitoring event shall be conducted immediately prior to filter replacement and with substrate located inside the booth.
 - D. Remanufactured Business Furniture - St. Louis shall maintain an operating and maintenance log for the booths which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
5. Control Device Requirement – Overspray & Exhaust Collection System
 - A. Remanufactured Business Furniture - St. Louis shall control emissions from each spray gun using booth exhaust filters (CD-02, CD-03, CD-04, CD-05, CD-06, CD-07). They must be rated for at least 95% particulate control efficiency as specified in the permit application.
 - B. The filters shall be operated and maintained in accordance with the manufacturer's specifications. The filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural

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SPECIAL CONDITIONS:

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

Resources' employees may easily observe them.

- C. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - D. Remanufactured Business Furniture - St. Louis shall monitor and record the operating pressure drop across the filters at least once every 24 hours, while the plant is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - E. Remanufactured Business Furniture - St. Louis shall maintain a copy of the filter manufacturer's performance warranty on site.
 - F. Remanufactured Business Furniture - St. Louis shall maintain an operating and maintenance log for the filters which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
6. Control Device Requirement – Cyclone (CD-07)
- A. Remanufactured Business Furniture - St. Louis shall control particulate emissions from EP-09 Plywood Cutting - Sawdust using cyclones as specified in the permit application.
 - B. Remanufactured Business Furniture - St. Louis shall conduct visible emissions monitoring of the cyclone at least once every 24 hours of operation. Visible emissions monitoring shall be conducted using EPA Test Method 22 procedures. If visible emissions are present, Remanufactured Business Furniture - St. Louis shall perform maintenance on the cyclone. Maintenance shall be conducted no later than eight hours of operation after the visible emissions are observed. Maintenance shall include, but is not limited to:
 - 1) Inspection of the solids discharge valve for proper operation
 - 2) Inspection of the structural components including the cyclone ductwork and hood for leaks and/or component failure.
 - 3) Inspection of the barrel and collecting tube for deposits and/or

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

excess wear and cleaning/repairing as necessary. Dents in the barrel or collecting tube shall be removed to ensure proper operation.

- 4) Cleaning of the cyclone inlet vanes.

C. Remanufactured Business Furniture - St. Louis shall maintain an operating and maintenance log for the cyclones which shall include the following:

- 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
- 2) Visible emission observations; and
- 3) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

- 7. Operational Requirement - Allowable Spray Activities in Booths
Remanufactured Business Furniture - St. Louis shall operate no more than two spray guns at a time inside each spray booth (EP-02, EP-03a, EP-03b, EP-03c, EP-03d) with the exception of the powder coating area which is done with a single electrostatic application. Remanufactured Business Furniture - St. Louis shall restrict activity in each booth as stated in Table 3.

Table 3: Spray Activities in Booths

Emission Point	Description	Activity
EP-02	Primer 3-Sided Paint Booth	2 guns applying primer
EP-03a ¹	Water-based Base-Coat 3-Sided Paint Booth	2 guns applying water-based coat
EP-03b ¹	Water-based Base-Coat 3-Sided Paint Booth	2 guns applying water-based coat
EP-03c ¹	Water-based Base-Coat 3-Sided Paint Booth	2 guns applying water-based coat
EP-03d ¹	Water-based Base-Coat 3-Sided Paint Booth	2 guns applying water-based coat
EP-04	Electrostatic Powder Coat 4-Sided Paint Booth	1 gun applying air-atomized electrostatic powder coat

¹ Remanufactured Business Furniture - St. Louis coats specific furniture types (desks, tables, file panels, etc) in each booth of the EP-03 booths. However, PTE does not distinguish between furniture types and therefore there are not any limitations on where pieces of furniture are coated within the booths.

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SPECIAL CONDITIONS:

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

8. Operational Requirement – Identification of Coatings and Cleaning Solvents
Remanufactured Business Furniture - St. Louis shall keep the coatings, and cleaning solvents in sealed containers whenever the materials are not in use. Remanufactured Business Furniture - St. Louis shall provide and maintain suitable, easily read, permanent markings on all coatings and cleaning solvent containers used in operations or stored on-site.
9. Record Keeping and Reporting Requirements
 - A. Remanufactured Business Furniture - St. Louis shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
 - B. Remanufactured Business Furniture - St. Louis shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2015-02-053
Installation ID Number: 510-2236
Permit Number:

Remanufactured Business Furniture - St. Louis Complete: July 10, 2015
5055 Natural Bridge Road
St. Louis, Missouri 63115

Parent Company:
RBF Office Interiors
5055 Natural Bridge Road
St. Louis, Missouri 63115

St. Louis City

REVIEW SUMMARY

- Remanufactured Business Furniture - St. Louis has applied for the authorized installation of a furniture re-finishing operation including solvent wipe-down, primer coating, base coating, adhesive sprays (upholstery and metal surfaces), and a wood shop.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are Toluene, Xylene, Ethyl Benzene, Methylene Chloride, Hexane, Diethylene Glycol, Methyl Isobutyl Ketone (MIBK), and Toluene Diisocyanate.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- 40 CFR 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, does not apply to this installation because there are no compounds containing target HAPs.
- 40 CFR 63, Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products*, does not apply to the application because it is not a major source of HAPs.
- An overspray collection filtering system is being used to control the particulate HAPs and particulate matter emissions from the equipment in this permit. Three-sided or fully-enclosed paint booths (EP-02, EP-03a, EP-03b, EP-03c, EP-03d, EP-04) with circulation fans and/or exhaust fans will be used for the capture of these pollutants prior to control via filtration.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs have been conditioned below de minimis levels by taking a voluntary limit, and all remaining pollutants are below de minimis levels with the use of capture and control devices.

- This installation is located in St. Louis City, a nonattainment area for the 8-hour ozone standard and the PM_{2.5} standard and an attainment area for all other criteria pollutants. The installation's major source level for NO_x and VOC is 100 tons per year.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level, for pollutants other than NO_x and VOC, is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Emissions testing is not required for the equipment.
- Approval of this permit is recommended with special conditions.
- No operating permit is required since the installation's emissions totals are below their respective de minimis levels.

INSTALLATION DESCRIPTION

Remanufactured Business Furniture – St. Louis is an existing office furniture repairing and remanufacturing facility located in St. Louis City, Missouri. RBF-StL has never received an operating permit or a construction permit from Missouri Air Pollution Control Program. Customers send in large orders of office furniture including, but not limited to, desks, chairs, tables, file cabinets, and office panels. Due to the unique nature of customer orders that are placed, an equally unique operation is required to fulfill customer needs. Remanufacturing can include some or all of the following steps: cleaning, re-surfacing, re-edging, re-sizing, re-laminating, coating with paints and primers, or upholstery repair. This project permits the use of existing equipment (1 welding torch and machine drilling stations), but these pieces of equipment do not contribute to potential emissions estimates.

PROJECT DESCRIPTION

This project pertains to all of the steps in the installation description, as well as existing equipment (welding area and machine-drilling stations). The full process begins with cleaning customer orders with a solvent rag in the wipe-down area (EP-01). The product then moves through the coating phases; coating phases begin with the application of a primer coating (EP-02) in the primer coating booth, and are then followed by the application of water-based paints in one of the three water-based coating booths (EP-03a, EP-03b, EP-03c). Some, not all, of the products may require forced drying in the electric curing/dry-off oven. After the coating process is completed, the product moves along to the adhesive spray phase in the adhesive spray booth (EP-03d). An optional powder coating station takes place in a fully-enclosed spray booth (EP-04) equipped with an inherent control device to provide safety—as electrically charged particles may accumulate on the inside of the spray booth, and therefore, the use of a filtration system is necessary even in the absence of regulatory requirements. Both adhesive spray and the upholstery repairing (EP-05) vent out of Stack 5. Upon completion of these phases, the product is transferred to the wood shop (EP-06); in the wood shop, products can undergo re-sizing, re-edging, and other

miscellaneous wood working needs. As stated in the installation description, all customer orders are unique and may not require all of the steps outlined in the project description.

MHDR DETERMINATION JUSTIFICATION

Because every order is custom with varying amounts of coatings and adhesives required and because not every order requires every step of this process, PTE was evaluated using actual usage data outlining the maximum volumetric coating usage (over a consecutive 12-month period) based on the previous five years of operation. Table 4 (below) shows the volumetric usage of each coating type used over the respective consecutive 12-month periods. Due to the unique nature of customer orders placed with RBF-StL, this estimation of PTE was based on engineering judgment and the highest actual annual usage from the previous 5 years. The MHDR is based on the highest annual usage divided by the total hours worked (one 8-hour shift per working day for 5 days a week for 52 weeks out of the year equivalent to 2,080 hours per year). Each process step was considered additive because there is a separate spray booth or production area for each step (solvent wipe-down, primer, coating, adhesive repairing, and the wood shop).

Table 4: Actual Volumetric Usage Rates

Emission Process	2010 (gal/yr)	2011 (gal/yr)	2012 (gal/yr)	2013 (gal/yr)	2014 (gal/yr)	Highest 5- Year Annual Usage (gal/yr)	MHDR (gal/hr)
Solvent Wipe-Down	600	450	560	450	510	600	0.29
Primer	140	108	176	148	220	220	0.11
Painting (Base Coat /Powder Coat)	4957	1581	3330	2275	2024	4957	2.83
Metal-Adhesive	15.2	22.1	19.7	22.2	15.2	22.2	0.011
Upholstery Adhesive	385	165	275	275	220	385	0.19
Wood Shop*	1231 sheets/yr	1271 sheets/yr	1400 sheets/yr	234 sheets/yr	260 sheets/yr	1417 sheets/yr	0.68 sheets/hr

*The wood shop emissions were calculated based on particle board emission factors (lb/ft³); the total number of sheets was converted into linear feet of wood being cut in the PTE calculations.

EMISSIONS/CONTROLS EVALUATION

The PTE for this installation was calculated using material balances based on the material SDSs included in the submitted application. All VOC and volatile HAP emissions were assumed to be unfilterable and 100% released to the atmosphere because there are no VOC-control devices in place.

The particulate matter emissions were calculated as 100% of the remaining portion of the total density (pounds per gallon) after the VOC content (pounds per gallon) was subtracted. The transfer efficiency of 65% for non-atomized spray coating applications on flat/sheet-like surfaces was taken from the APTI 482, Third Edition, *Sources and Control of Volatile Organic Air Pollutants*, Chapter 5 *Surface Coating*, Section 5.1.3.1 *Spray Coating*. For electrostatic powder coating operations, a transfer efficiency of 95% was obtained from AP-42. The use of “roll-on” or “wipe-on” coatings was assessed on an individual basis due to the

differences in transfer efficiencies associated with these application methods. To more accurately estimate particulate matter emissions; in cases where the substance was not applied by spray gun, it was assumed that there were no particulate matter or PM-based HAP emissions from those substances (VOC emissions for these compounds were still assessed and included in the PTE summary).

The control efficiency (95%) of the “Duo” fiberglass paint filters was taken from CHEMCO’s (the manufacturer’s) product specifications sheet. The particulate control efficiency of 95% is based on a clean filter with an initial pressure-drop/resistance of 0.02 inches of w.c. (equal to 59.7 Pascals)—the efficiency of a well-maintained filter can only increase as it approaches the maximum load. A control efficiency of 99% was used for the HEPA filters in the fully enclosed spray booth (EP-04) for calculating the PTE of powder coating operations. Special Condition 4 in this permit specifies some of requirements that the filters must meet in order to remain in compliance. The capture efficiency for the three-sided paint booths was assumed to be 90% based on similar paint booths and engineering judgment. The capture efficiency of the fully-enclosed spray booth (EP-04) was assumed to be 100%. There are no particle size distributions for this type of painting operation, so the particulate matter emissions are all conservatively assumed to be PM_{2.5}.

For processes that have multiple coatings/adhesives to choose from, the compound with the highest content for the specific pollutant being analyzed (individual HAP, HAP, VOC, PM_{2.5}) was chosen. Table 5 shows the contents of individual HAPs, combined HAPs, VOCs, and PM_{2.5} for each compound.

Dryer emissions are included in the mass balance calculations.

PTE for the wood shop cutting/sawing phase was determined by calculating the volume of wood lost based on a standard length of cuts and the standard “kerf” associated with the sawblade; a “kerf” is the amount of wood that is removed when a saw is used to cut the wood. The kerf width was multiplied by the standard particle board thickness, then by the length of a single cut (8 feet per cut), and then by the number of cuts per sheet of particle board (4 cuts per sheet). These values are referred to as “standard” for wood shop operations. The actual annual usage data for the total number of particle board sheets divided by total hours worked was used to determine the PTE for the wood shop operations area. The emission factor for particulate matter from the standard cutting operations in the wood shop was determined to be 2.1 pounds per sheet of particle board (standard size and cutting specifications). The “Edgebanding Hot Melt” is applied by hand with a roller rather than using spray methods; therefore, VOC emissions are accounted for in PTE calculations due to the 100% transfer efficiency of particulate matter in this compound.

The following table (Table 5) provides the values from which the PTE was calculated. The HAP and VOC emissions were calculated using the values given on the respective material SDSs; the PM_{2.5} portions of total emissions were calculated by assuming that the remaining non-VOC portion of total density comprised the PM_{2.5} emissions.

Table 5: Worst-case Potential Emissions Data and Classifications

Coating Class	Individual HAPs Contained*	Individual HAPs Density* (lb/gal)	Total HAPs Density (lb/gal)*	Total VOCs Density (lb/gal)*	Total PM _{2.5} Density (lb/gal)*
Solvents & Reducers	Toluene	1.45	1.45	7.49	--
	Toluene Diisocyanate	0.07			
Acrylic Primer Surfacer	Toluene	0.89	3.41	5.56	4.20
	Xylene	0.26			
	Ethyl Benzene	0.10			
Base Coat	Methyl Isobutyl Ketone (MIBK)	0.42	0.51	1	14.61
	Diethylene Glycol Mono Ether	0.09			
HY-12	Hexane	3.96	5.61	5.61	2.91
	Toluene	1.65			
Adfast Corp. #8916	Methylene Chloride	6.5	6.5	7.62	2.38
Edgebanding Hot Melt	--	--	--	0.08	--
Wood Cutting	--	--	--	--	2.1 lb/sheet

*-- indicates that there is no applicable value for the designated cell in the table.

The electronic tracking sheet used for this project lists the applicable screening model action levels (SMALs) for every permitted pollutant. For a complete list of HAPs with their respective SMALs, refer to the most current list of SMALs for individual HAPs. This can be obtained from Missouri Air Pollution Control Program by contacting the Construction Permits Unit, or using available online resources.

The following table (Table 6) provides an emissions summary for this project. There is no existing potential or actual emissions information available. Potential emissions of the application represent the uncontrolled potential emissions of the equipment and operations based on a normalized MHDR derived from actual values of one 8-hour shift per day, 5 days a week, 52 weeks a year. New installation conditioned emissions account for emissions based on transfer efficiency of 65% (except electrostatic powder application which is 95%), installed overspray and exhaust filter control devices (95% or 99% for non-powder or powder coatings, respectively) and a voluntary annual emission limit taken for VOCs.

Table 6: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis/SMAL Levels	Existing Potential Emissions	Existing Actual Emissions (2014 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	N/A	N/A	286.28	9.03
PM ₁₀	15.0	N/A	N/A	286.28	9.03
PM _{2.5}	10.0	N/A	N/A	286.28	9.03
SOx	40.0	N/A	N/A	N/A	N/A
NOx	40.0	N/A	N/A	N/A	N/A
VOC	40.0	N/A	N/A	75.99	<40.0
CO	100.0	N/A	N/A	N/A	N/A
GHG (CO ₂ e)	75,000 / 100,000	N/A	N/A	N/A	N/A
Individual HAPs*	10.0	N/A	N/A	5.27	5.27
<i>Toluene</i>	10.0	N/A	N/A	2.32	2.32
<i>Hexane</i>	10.0	N/A	N/A	0.19	0.19
<i>Methylene Chloride</i>	10.0	N/A	N/A	5.27	5.27
<i>Ethyl Benzene</i>	10.0	N/A	N/A	0.05	0.05
<i>Xylene (mixed isomers)</i>	10.0	N/A	N/A	0.12	0.12
<i>Methyl Isobutyl Ketone</i>	10.0	N/A	N/A	4.44	4.44
<i>Toluene Diisocyanate</i>	0.1	N/A	N/A	0.09	0.09
<i>Diethylene Glycol Monobutyl Ether</i>	5.0	N/A	N/A	0.95	0.95
Combined HAPs	25.0	N/A	N/A	14.31	14.31

N/A = Not Applicable

*Individual HAPs included in this permit application are listed in italics.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs have been conditioned below de minimis levels by taking a voluntary limit, and all remaining pollutants are below de minimis levels with the use of capture and control devices.

APPLICABLE REQUIREMENTS

Remanufactured Business Furniture - St. Louis shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-6.165*

SPECIFIC REQUIREMENTS

- *None of the operations at this installation trigger the applicability of a MACT.*

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Jordan Hindman
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 24, 2015, received February 26, 2015, designating RBF Office Interiors as the owner and operator of the installation

APPENDIX A

Abbreviations and Acronyms

%	percent	m/s	meters per second
°F	degrees Fahrenheit	Mgal	1,000 gallons
acfm	actual cubic feet per minute	MW	megawatt
BACT	Best Available Control Technology	MHDR	maximum hourly design rate
BMPs	Best Management Practices	MMBtu	Million British thermal units
Btu	British thermal unit	MMCF	million cubic feet
CAM	Compliance Assurance Monitoring	MSDS	Material Safety Data Sheet
CAS	Chemical Abstracts Service	NAAQS ...	National Ambient Air Quality Standards
CEMS	Continuous Emission Monitor System	NESHAPs	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	NO_x	nitrogen oxides
CO	carbon monoxide	NSPS	New Source Performance Standards
CO₂	carbon dioxide	NSR	New Source Review
CO_{2e}	carbon dioxide equivalent	PM	particulate matter
COMS	Continuous Opacity Monitoring System	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
CSR	Code of State Regulations	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter
dscf	dry standard cubic feet	ppm	parts per million
EQ	Emission Inventory Questionnaire	PSD	Prevention of Significant Deterioration
EP	Emission Point	PTE	potential to emit
EPA	Environmental Protection Agency	RACT	Reasonable Available Control Technology
EU	Emission Unit	RAL	Risk Assessment Level
fps	feet per second	SCC	Source Classification Code
ft	feet	scfm	standard cubic feet per minute
GACT	Generally Available Control Technology	SDS	Safety Data Sheet
GHG	Greenhouse Gas	SIC	Standard Industrial Classification
gpm	gallons per minute	SIP	State Implementation Plan
gr	grains	SMAL	Screening Model Action Levels
GWP	Global Warming Potential	SO_x	sulfur oxides
HAP	Hazardous Air Pollutant	SO₂	sulfur dioxide
hr	hour	tph	tons per hour
hp	horsepower	tpy	tons per year
lb	pound	VMT	vehicle miles traveled
lbs/hr	pounds per hour	VOC	Volatile Organic Compound
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		

Appendix B: Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CARBARYL	63-25-2	10	V	Y	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CARBON DISULFIDE	75-15-0	1		Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CARBON TETRACHLORIDE	56-23-5	1		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
ACETOPHENONE	98-86-2	1		Y	N	CARBONYL SULFIDE	463-58-1	5		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CATECHOL	120-80-9	5		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
ACROLEIN	107-02-8	0.04		Y	N	CHLORAMBEN	133-90-4	1		Y	Y	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
ACRYLAMIDE	79-06-1	0.02		Y	N	CHLORDANE	57-74-9	0.01		Y	Y	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
ACRYLIC ACID	79-10-7	0.6		Y	N	CHLORINE	7782-50-5	0.1		N	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
ACRYLONITRILE	107-13-1	0.3		Y	N	CHLOROACETIC ACID	79-11-8	0.1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
AMINOBIHENYL, [4-]	92-67-1	1	V	Y	N	CHLOROBENZENE	108-90-7	10		Y	N	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
ANILINE	62-53-3	1		Y	N	CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	DIMETHYL PHTHALATE	131-11-3	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CHLOROFORM	67-66-3	0.9		Y	N	DIMETHYL SULFATE	77-78-1	0.1		Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
ANTIMONY COMPOUNDS		5	H	N	Y	CHLOROPRENE	126-99-8	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	CHROMIUM COMPOUNDS		5	L	N	Y	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
ANTIMONY TROXIDE	1309-64-4	1	H	N	Y	CHRYSENE	218-01-9	0.01	V	Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	COBALT COMPOUNDS		0.1	M	N	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
ASBESTOS	1332-21-4	0	A	N	Y	CRESOL, [META-]	108-39-4	1	B	Y	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
BENZENE	71-43-2	2		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
BENZIDINE	92-87-5	0.0003	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	CUMENE	98-82-8	10		Y	N	ETHYL ACRYLATE	140-88-5	1		Y	N
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N	ETHYL BENZENE	100-41-4	10		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y	ETHYL CHLORIDE	75-00-3	10		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N	ETHYLENE GLYCOL	107-21-1	10		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N	ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2				
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DIAZOMETHANE	334-88-3	1		Y	N	ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N
BERYLLIUM SALTS		2E-05	J	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N	ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DIOXINS/FURANS		6E-07	D,V	Y	N	ETHYLENE OXIDE	75-21-8	0.1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DIBENZOFURAN	132-64-9	5	V	Y	N	ETHYLENE THIOUREA	96-45-7	0.6		Y	Y
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N	FORMALDEHYDE	50-00-0	2		Y	N
BROMOFORM	75-25-2	10		Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N	GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y	GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N	HEPTACHLOR	76-44-8	0.02		Y	N
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y	HEXACHLOROBENZENE	118-74-1	0.01		Y	N
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N	HEXACHLOROBUTADIENE	87-68-3	0.9		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N	HEXACHLOROCYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N
CALCIUM CYANAMIDE	156-62-7	10		Y	Y	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N	HEXACHLOROCYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N
CAPROLACTAM (Delisted)	105-60-2					DICHLOROMETHANE	75-09-2	10		N	N	HEXACHLOROCYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N
CAPTAN	133-06-2	10		Y	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y	HEXACHLOROCYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N

Appendix B: Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM	Chemical	CAS #	SMAL (tons/yr)	Group ID	VOC	PM
HEXACHLOROCYCLOPENTADIENE	77-47-4	0.1		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
HEXAMETHYLENE,-1,6-DIISOCYANATE	822-06-0	0.02		Y	N	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N	VINYL ACETATE	108-05-4	1		Y	N
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PARATHION	56-38-2	0.1		Y	Y	VINYL CHLORIDE	75-01-4	0.2		Y	N
HYDRAZINE	302-01-2	0.004		N	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y	XYLENE, [META-]	108-38-3	10	G	Y	N
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N	XYLENE, [ORTHO-]	95-47-6	10	G	Y	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N	XYLENE, [PARA-]	106-42-3	10	G	Y	N
HYDROQUINONE	123-31-9	1		Y	N	PHENOL	108-95-2	0.1		Y	N	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N						
ISOPHORONE	78-59-1	10		Y	N	PHOSGENE	75-44-5	0.1		Y	N						
LEAD COMPOUNDS		0.01	Q	N	Y	PHOSPHINE	7803-51-2	5		N	N						
LINDANE [GAMMA-HEXACHLOROCYCLOHEXANE]	58-89-9	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N	Legend					
MALEIC ANHYDRIDE	108-31-6	1		Y	N	PHTHALIC ANHYDRIDE	85-44-9	5		Y	N	Group ID	Aggregate Group Name				
MANGANESE COMPOUNDS		0.8	R	N	Y	POLYCYCLIC ORGANIC MATTER		0.01	V	Y	N	A	Asbestos				
MERCURY COMPOUNDS		0.01	S	N	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y	B	Cresols/Cresylic Acid (isomers and mixtures)				
METHANOL	67-56-1	10		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N	C	2,4 - D, Salts and Esters				
METHOXYCHLOR	72-43-5	10	V	Y	Y	PROPIONALDEHYDE	123-38-6	5		Y	N	D	Dibenzofurans, Dibenzodioxins				
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y	E	4, 6 Dinitro-o-cresol, and Salts				
METHYL CHLORIDE	74-87-3	10		Y	N	PROPYLENE OXIDE	75-56-9	5		Y	N	F	Lindane (all isomers)				
METHYL ETHYL KETONE (Delisted)	78-93-3					PROPYLENEMINE, [1,2-]	75-55-8	0.003		Y	N	G	Xylenes (all isomers and mixtures)				
METHYL HYDRAZINE	60-34-4	0.06		Y	N	QUINOLINE	91-22-5	0.006		Y	N	H	Antimony Compounds				
METHYL IODIDE	74-88-4	1		Y	N	QUINONE	106-51-4	5		Y	N	I	Arsenic Compounds				
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y	J	Beryllium Compounds				
METHYL ISOCYANATE	624-83-9	0.1		Y	N	SELENIUM COMPOUNDS		0.1	W	N	Y	K	Cadmium Compounds				
METHYL METHACRYLATE	80-62-6	10		Y	N	STYRENE	100-42-5	1		Y	N	L	Chromium Compounds				
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	STYRENE OXIDE	96-09-3	1		Y	N	M	Cobalt Compounds				
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN,[2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y	N	Coke Oven Emissions				
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N	O	Cyanide Compounds				
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N	P	Glycol Ethers				
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N	Q	Lead Compounds (except elemental Lead)				
MINERAL FIBERS		0	T	N	Y	TOLUENE	108-88-3	10		Y	N	R	Manganese Compounds				
NAPHTHALENE	91-20-3	10	V	Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N	S	Mercury Compounds				
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N	T	Fine Mineral Fibers				
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	TOXAPHENE	8001-35-2	0.01		Y	N	U	Nickel Compounds				
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N	V	Polycyclic Organic Matter				
NICKEL COMPOUNDS		1	U	N	Y	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N	W	Selenium Compounds				
NICKEL REFINERY DUST		0.08	U	N	Y	TRICHLOROETHYLENE	79-01-6	10		Y	N	X	Polychlorinated Biphenyls (Aroclors)				
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N	Y	Radionuclides				
NITROBENZENE	98-95-3	1		Y	N	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N						
NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N	TRIFLURALIN	1582-09-8	9		Y	Y						
NITROPHENOL, [4-]	100-02-7	5		Y	N												
NITROPROPANE, [2-]	79-46-9	1		Y	N												
Notes																	
												Note 1	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million				

Mr. Forrest Howard
Maintenance Manager
Remanufactured Business Furniture - St. Louis
5055 Natural Bridge Road
St. Louis, Missouri 63115

RE: New Source Review Permit - Project Number: 2015-02-053

Dear Mr. Howard:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, Truman State Office Building P.O. Box 1557, Jefferson City, MO 65102, www.ao.mo.gov/ahc.

If you have any questions regarding this permit, please contact Jordan Hindman, Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, 573-751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:jhl

Enclosures

c: Saint Louis Regional Office
PAMS File: 2015-02-053
Permit Number: