

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

PERMIT BOOK

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: 102007-012 Project Number: 2006-02-027

Parent Company: ROM Corporation

Parent Company Address: 6800 E. 163rd Street

Installation Name: ROM Corporation

Installation Address: 6800 E. 163rd Street

Location Information: Cass County, T469, R33W

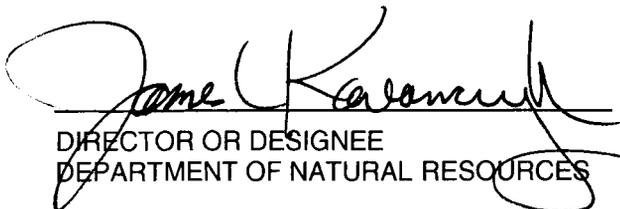
Application for Authority to Construct was made for:
Expansion of the spray painting area and the addition of a pre-treat system. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

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

OCT 23 2007

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 this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

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 source(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.

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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Permit Number: Project Number: 2006-02-027

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Parent Company Address: 6800 E. 163rd Street

Installation Name: ROM Corporation

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Location Information: Cass County, T469, R33W

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Permit No.	
Project No.	2006-02-027

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."

ROM Corporation
Cass County, T46N, R33W

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 032004-011) from the Air Pollution Control Program.
2. **Emission Limitation**
 - A. ROM Corporation shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from installation in any consecutive 12-month period.
 - B. Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A), 1(B), and 1(C). ROM Corporation shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
 - C. ROM Corporation shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(C) indicate that the source exceeds the limitation of Special Conditions Number 1(A) and 1(B).
3. **Control Device – Paper Filter**
Paper filters must be in use at all times when metal finishing paint booth (EP02) is in operation. The paper filters shall be operated and maintained in accordance with the manufacturer's specifications.
4. **Operational Requirements**
ROM Corporation shall keep the paint solvents and cleaning solutions in sealed containers whenever the materials are not in use. ROM Corporation shall

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SPECIAL CONDITIONS:

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

provide and maintain suitable easily read permanent markings on all paint solvent and cleaning solution containers used with this equipment.

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

Project Number: 2006-02-027
Installation ID Number: 037-0061
Permit Number:

ROM Corporation
6800 E. 163rd Street
Belton, MO 64012

Complete: 3/01/2006

Parent Company:
ROM Corporation
6800 E. 163rd Street
Belton, MO 64012

Cass County, T46N, R33W

REVIEW SUMMARY

- ROM Corporation has applied for authority to expand the existing spray painting area and add a pre-treat system.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are xylene.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- Paper filters are being used to control the PM₁₀ emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of HAPs are below de minimis levels.
- This installation is located in Cass County, a maintenance area for ozone (O₃) and an attainment area for all other criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the source.
- A Basic Operating Permit application is required for this installation within 30 days of

equipment startup.

- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

ROM Corporation owns and operates a bulkhead manufacturing plant in Belton, Missouri. The bulkheads produced are used in the food distribution, fire service, and build security industries.

The following permits have been issued to ROM Corporation from the Air Pollution Control Program.

Permit Number	Description
112003-006	Metal finishing
032004-011	Spray Painting

PROJECT DESCRIPTION

ROM Corporation has applied for authority to expand their existing spray booth to allow for more room to paint and cure doors. The spray equipment used for paint application will not be modified. Expanding the spray booth will increase production by reducing the amount of rework do to cross contamination. In addition to expanding the existing paint booth ROM Corporation will install a pre-treat system. The applicant submitted a maximum application rate of 0.34 gallons per hour. This rate is based on maximum historical usage and hours of operation.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, section 1.5 Liquefied Petroleum Gas Combustion, October 1996. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	1.8	N/D	0.05	N/A
SO _x	40.0	N/A	N/D	N/A	N/A
NO _x	40.0	N/A	N/D	0.62	N/A
VOC	40.0	39.4	16.97	7.66	N/A
CO	100.0	N/A	N/D	0.52	N/A
Total HAPs	25.0	35.7**	N/D	6.51	< 25
Ethyl Benzene	10.0	N/D	N/D	0.71	< 10
Styrene	10.0	N/D	N/D	0.14	< 10
Methyl Isobutyl	10.0	N/D	N/D	0.71	< 10
Toluene	10.0	N/D	N/D	0.71	< 10
Xylene	10.0	N/D	N/D	4.24	< 10

*N/A = Not Applicable; N/D = Not Determined

**Combined HAPs were limited to less the 25 tons under permit 032004-011

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 HAPs are below de minimis levels.

APPLICABLE REQUIREMENTS

ROM Corporation 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *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 10-3.090

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Control of Emissions from Industrial Surface Coating Operations*, 10 CSR 10-2.230

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.

Michael Mittermeyer
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated 1/26/2006, received 2/07/2006, designating ROM Corporation as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey, dated 3/8/2006.

less than ten tons indicates compliance.

Mr. Tom Paget
Plant Manager
ROM Corporation
6800 E. 163rd Street
Belton, MO 64012

RE: New Source Review Permit - Project Number: 2006-02-027

Dear Mr. Paget:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, 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 amended 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 have any questions regarding this permit, please do not hesitate to contact me at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817. Thank you for attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:mml

Enclosures

c: Kansas City Regional Office
PAMS File 2006-02-027
Permit Number: