



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

## DEPARTMENT OF NATURAL RESOURCES

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**JAN 11 2016**

Mr. Bjoern Meyer  
SAF-Holland, Inc.  
308 W Walton Street  
Warrenton, MO 63383

Re: SAF-Holland, Inc., 219-0013  
Permit Number: OP2015-014

Dear Mr. Meyer:

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/jrl

Enclosures

c: Robert Cheever, US EPA Region VII  
PAMS File: 2014-06-030



# 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:** OP2015-014  
**Expiration Date:** January 11, 2021  
**Installation ID:** 219-0013  
**Project Number:** 2014-06-030

**Installation Name and Address**

SAF-Holland, Inc.  
308 W Walton Street  
Warrenton, MO 63383  
Warren County

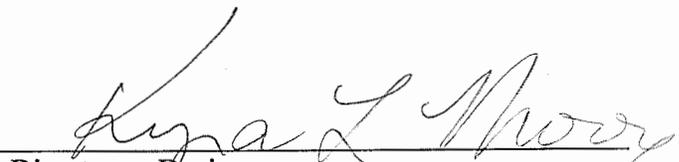
**Parent Company's Name and Address**

SAF-Holland USA, Inc.  
467 Ottawa Ave  
Holland, MI 49423-3983

**Installation Description:**

SAF-Holland, Inc. produces and finishes tractor-trailer components from steel stock. Processes include welding, parts washing, painting, and lumber sawing. The installation took a voluntary limitation on VOCs and HAPs to become an intermediate source; therefore it is not a major source for any pollutants.

  
Prepared by:  
Jacob Robinett  
Operating Permit Unit

  
Director or Designee  
Department of Natural Resources  
JAN 11 2016

Effective Date

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# I. Installation Description and Equipment Listing

## INSTALLATION DESCRIPTION

SAF-Holland, Inc. is a manufacturer of components used in over the road trailers. Support legs are produced in the south plant, located at 308 W. Walton Street. The north plant is located at 404 W. Booneslick Road. The south plant is where the main office for the two facilities is located. The north plant serves as a feeder operation to the south plant and another plant in Arkansas. The north plant also converts coil steel in a roll forming operation and includes lumber sawing, painting, sanding, and parts washing operations. For permitting purposes, the two facilities are viewed as one installation.

The installation is not a named source, and the fugitive emissions from emission units do not count towards major source applicability. The following table lists actual emissions of reported air pollutants for the past five (5) years as they appeared on the submitted Emissions Inventory Questionnaires (EIQs).

<b>Reported Air Pollutant Emissions, tons per year</b>					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	3.79	1.15	1.15	1.15	0.47
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	3.75	1.11	1.11	-	0.00
Volatile Organic Compounds(VOC)	38.61	31.22	31.22	31.22	17.93
Hazardous Air Pollutants (HAPs)	0.07	0.07	0.07	0.07	0.03

## 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. These emission sources are also subject to the plant-wide emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP 12	Paint Spray Booth
EP 31	Electrostatic Paint Spray System
EP 35	Vac-U-Paint System
EP 36	3 MMBtu/hr, Natural Gas Fired, Burn-Off Oven, installed 1996
EP 37	Metals Preparation and Coating Process (Permit 112008-010)

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### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. These emission sources are subject to the plant-wide emission limitations.

#### Description of Emission Source

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EP 05	(5) Safety Kleen Parts Washers (Coolant Management Systems) – thirty five (35) gal capacity
EP 13	(4) Parts Washers – thirty five (35) gal capacity, water-soluble cleaner
EP 14	Lumber Sawing Pallet Wood
EPA1	Electric Arc Welding
	(6) Gas Fire Furnace, < 1 MMBtu/hr total
	(14) Space Heaters, 0.01 MMBtu/hr each
	Alkaline Wash Heater, 4 MMBtu/hr, Natural Gas Fired, installed 1996
	Phosphate Wash Heater, 4 MMBtu/hr, Natural Gas Fired, installed 1996
	(2) Curing Oven, 0.5 MMBtu/hr each, Natural Gas Fired, installed 1995
	Preheat Oven, 1 MMBtu/hr, Natural Gas Fired, installed 1995
	Heat Treat Oven, 0.078 MMBtu/hr, Natural Gas Fired, installed before 1970
	Heat Treat Oven, 0.180 MMBtu/hr, Natural Gas Fired, installed before 1970
	Washer Dryer, 1.5 MMBtu/hr, Natural Gas Fired, installed 2008
	Drying Oven, 1.5 MMBtu/hr, Natural Gas Fired, installed 2008
	Cure Oven, 2.0 MMBtu/hr, Natural Gas Fired, installed 2008

## II. Plant Wide Emission Limitations

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

### PERMIT CONDITION PW001

10 CSR 10-6.065, Operating Permits  
Voluntary Permit Limitation – 10 CSR 10-6.065 (2)(C) and (5)(A)

#### **Emission Limitation:**

The permittee shall emit less than one hundred (100) tons of Volatile Organic Compounds (VOC) from the entire installation in any consecutive 12-month period.

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

1. The permittee shall calculate monthly and 12-month rolling total VOC emissions each month using Attachment D or equivalent forms approved by the Air Pollution Control Program to demonstrate compliance with the emission limit. All products containing VOC used in the entire installation shall be recorded.
2. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include a Safety Data Sheet (SDS) for all materials used.

#### **Reporting:**

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

### PERMIT CONDITION PW002

10 CSR 10-6.060, Construction Permits Required  
Construction Permit Number: 112008-010, Issued November 24, 2008

#### **Emission Limitation:**

SAF-Holland, Inc. shall emit less than ten (10) tons individually and less than twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period.

#### **Operational Limitation:**

The permittee shall keep all chemicals (i.e. solvents, cleaners, etc.) used in the metals preparation and coating process in sealed containers whenever the chemicals are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all chemical containers used with the equipment. [Construction Permit No. 112008-010]

**Monitoring/Record Keeping:**

1. The permittee shall maintain records of monthly and 12-month rolling total individual and combined HAP emissions using Attachments A and B or equivalent forms approved by the Air Pollution Control Program (APCP).
2. Records shall include each individual HAP identified on a SDS for the HAP containing products in use in the entire installation.
3. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
4. All records shall be maintained for five years.

**Reporting:**

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

### 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.

EP12 – Spray Paint Booth			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP12	Spray Paint Booth; MHDR = 0.0461 gal/hr coating mix	Binks	1996

<b>PERMIT CONDITION 1</b> 10 CSR 10-6.060, Construction Permits Required Construction Permit Number: 0893-027, Issued August 11, 1993
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**Emission Limitation:**

1. The permittee shall not exceed the usage of more than 15,000 gallons of primer in any consecutive 12-month period (Special condition #1)
2. The permittee shall now use a primer in which the volatile organic compound (VOC) content exceeds 4.62 pounds per gallon. (Special Conditions #2)
3. If the presence of toxic solvents in the ambient air is detected in quantity and duration that directly or approximately causes or contributes to injury to human, plant or animal, life or health or to property, or that unreasonably interferes with the enjoyment of life or use of property, or is a violation of a state rule, then the permittee shall immediately undertake a program that will correct the problem (taken from the Missouri Air Conservation Law, Chapter 643 RSMo.)(Special Condition #6)

**Monitoring/Record Keeping:**

1. Attachment H or equivalent forms shall be used to maintain monthly and rolling 12-month records detailing the amount (in gallons) and the VOC content (in pounds per gallon) of each primer used and the VOC emissions from the paint booth. (Special Condition #3)
2. These records shall be maintained for five (5) years and shall be made available to either the Director upon written request or Department inspection personnel upon verbal request. (Modified Special Condition #4)

**Reporting:**

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

<b>EP36 – Vac-U-Paint System</b>			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP 36	Burn-Off Oven, 3 MMBtu/hr, natural gas	-	1996

<p><b>PERMIT CONDITION 2</b> 10 CSR 10-6.060, Construction Permits Required Construction Permit No. 0296-003A</p>
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**Operational Specification:**

The permittee shall not burn Teflon<sup>®</sup>, chlorinated plastics, or trash in the heat cleaning oven. (Special Condition #1)

**Monitoring/Record Keeping:**

The permittee shall monitor and record all the materials being placed into the heat cleaning oven using Attachment J or an equivalent form.

**Reporting:**

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

<b>EP37 Metals Preparation and Coating Process</b>	
Emission Unit	Description
EP37	NEW METALS PREPARATION AND COATING PROCESS; Equipment includes a dip tank coating process and a pneumatic coating process MHDR = 11.88 gal/hr; a 2.0 MMBtu/hr natural gas-fired drying oven; a 1.5 MMBtu/hr drying oven; a 1.5 MMBtu/hr washer oven

<p><b>PERMIT CONDITION 3</b> 10 CSR 10-6.060 Construction Permits Required Construction Permit Number: 112008-010, Issued November, 24, 2008</p>
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**Operational Specifications:**

1. The permittee shall keep all chemicals (i.e. solvents, cleaners, etc.) used in the metals preparation and coating process in sealed containers whenever the chemicals are not in use. (Special Condition #1)
2. Use of Alternative Coatings/Paints for the Metals Preparation and Coating Process
  - A. When considering using an alternative material for the metals preparation and coating process that is different than a material listed in the Application for Authority to Construct, the permittee shall calculate the potential emissions of volatile organic compounds (VOCs) and each individual HAP in the alternative material. (Special condition #3.A)
  - B. The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases:
    - i) If the potential VOC emissions for the alternative material is equal to or greater than 20.86 ton per year, or
    - ii) If the potential emissions of each individual HAP for the alternative material is equal to or greater than its respective Screen Modeling Action Levels (SMAL), for any HAP with

SMAL less than ten (10) tons per year. A list of current SMAL values can be obtained at the following web address: <http://www.dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>.

**Monitoring/Record Keeping:**

Attachment C or equivalent forms shall be used to show compliance with Operational Specification 2.A through 2.B of this permit condition. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them immediately available to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all alternative material used.

**Reporting:**

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

Surface Coatings			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP-12	Manual Paint Spray Booth	Binks	1996
EP-31	Electro Static Paint Spray System	Binks	1996
EP-35 & EP-36	Vac-U-Paint Spray System	Vac-U-Paint, Inc.	-
EP-37	Materials Preparation and Coating Process	-	2008

**PERMIT CONDITION 4**

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

**Equipment and Operation Parameters:**

1. The permittee shall operate the emission units using the fabric filter systems at all times.
2. The permittee shall maintain and operate the fabric filters in accordance with the manufacturer's specifications. The manufacturer's specifications shall be retained onsite. The fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them.
3. The permittee shall maintain the pressure drop across the fabric filters within the design conditions specified by the manufacturer's performance warranty.
  - a) If the pressure drop falls out of this normal operating range, the permittee shall take corrective action to return the pressure drop to normal.
  - b) The permittee shall observe a pressure drop reading within the manufacturer's specification following the installation of a new filter.
4. The permittee shall keep replacement filters on hand at all times and be made of fibers appropriate for the operating conditions that are expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

**Monitoring**

1. The permittee shall monitor and record the operating pressure drop across the fabric filters at least once every 24 hours using Attachment I or equivalent forms approved by the Air Pollution Control

Program. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer’s performance warranty.

2. The permittee shall thoroughly inspect particle emission collection system for leaks and wear semi-annually.
3. If leaks or abnormal conditions are detected, the permittee shall implement appropriate measures for remediation within eight (8) hours.

**Record Keeping:**

1. The permittee shall maintain records of all daily pressure drop readings for each fabric filter.
2. The permittee shall maintain records of all inspections of each fabric filter.
3. The permittee shall maintain records of all fabric filter replacement and maintenance performed.
4. Attachments E and F contain logs including these record keeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
5. All records shall be made available immediately for inspection to Department of Natural Resources’ personnel upon request.

**Reporting:**

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

<b>Surface Coatings</b>			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP12	Manual Paint Spray Booth	Binks	1996
EP31	Electrostatic Paint Spray System	Binks	1996
EP35 & EP36	Vac-U-Paint Spray System	Vac-U-Paint, Inc.	-
EP37	Material Preparation and Coating Process	-	2008
EPA1	Electric Arc Welding		
EP14	Lumber Sawing Pallet Wood		20

**PERMIT CONDITION 5**  
 10 CSR 10-6.220  
 Restriction of Emissions of Visible Air Contaminants

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 40%.

**Monitoring/Record Keeping:**

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects of visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required

when the emission unit is operating and when the weather conditions allow. If no visible or other significant 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 following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
  - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
  - c) Observations must be made once per month. 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.
4. Issuance of renewal Operating Permit does not affect the monitoring schedule.
5. The permittee shall maintain records of all observation results using Attachment G (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 U.S EPA Method 9 opacity test performed.

**Reporting:**

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted annually, in the annual monitoring report and annual compliance certification, as 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.
- 3) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 4) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under 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 2014, 2017, 2020, and 2023 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 G, 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 equipment malfunctions contributed to an exceedance.
- 3) 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 Bjoern Meyer, 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 A**  
**Monthly Combined HAPs Tracking Record**

(a)	(b)	(c)	(d)	(e)
Material used (Name, HAP CAS #)	Amount of Material Used	Density (Pounds per Gallon)	Combined HAP Content (Weight %)	Combined HAP Emissions (Tons)
Electric Arc Welding (EPA1)	(f) Amount of Monthly Throughput (1000 lbs)		(g) Emission Factor (lb/1000 lbs)	(h)
			0.32	
Total Natural Gas Combustion	(i) Amount of Monthly Throughput (MMcf)		(j) Emission Factor (lb/MMcf)	(k)
			1.8885	
(l) Total HAP emissions calculated for this month in tons:				
(m) 12-month rolling total HAP emissions total from previous month's Attachment A in tons:				
(n) Monthly HAP emissions total (l) from previous year's Attachment A in tons:				
(o) Current 12-month rolling total HAP emissions in tons: [(l) + (m) - (n)]				

- (a) Record the names of all material used this month.
- (b) Record the respective gallons, pounds, or tons of material used this month.
- (c) Record the respective density of materials from their SDS used this month.
- (d) Record the respective HAP content of the materials used this month. Obtain HAP content of material from their respective MSDS. If a range is given for the HAP content, use the highest in the range. If the material contains multiple individual HAPs, the combined HAP content (wt%) shall be obtained as the sum of all individual HAP contents (wt%).
- (e) Calculate the HAP emissions.  
If material usage is in gallons-  $[b] \times [c] \times [d] \times [0.0005] = [e]$
- (f) Record the amount of monthly throughput for the Electric Arc Welder.
- (g) HAP emission factor for the Electric Arc Welder taken from SCC 30905254.
- (h) Calculate HAP emission from the Electric Arc Welder:  $(h) = [(f) \times (g)] / 2000$
- (i) Record the MMcf of natural gas used by SAF-Holland, Inc.
- (j) HAP emission factor for natural gas combustion was taken from AP-42, Section 1.4.
- (k) Calculate HAP emission from natural gas combustion:  $(k) = [(i) \times (j)] / 2000$
- (l) Sum each individual HAP emission for this month:  $(l) = [\text{sum of all HAP emission in (e)}] + (h) + (k)$
- (m) Record the 12-month rolling total HAP emission (o) from last month's Attachment A.
- (n) Record the Monthly HAP emissions total (l) from previous year's Attachment A.
- (o) Calculate the current 12-month rolling total HAPs emissions. **A value of less than 25.0 tons of combined HAPs indicates compliance.**

**ATTACHMENT B**  
Monthly Individual HAPs Tracking Record

HAP Name: \_\_\_\_\_ CAS No.: \_\_\_\_\_

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

(a)		(b)	
List materials from attachment A which emit this specific HAP (Name, Type)		Individual HAP emissions from Attachment A [e] in Tons	
Electric Arc Welding	(c) Monthly Throughput(1000 lbs)	(d) Emission Factor (lb/1000 lbs)	(e) Ind. HAP emissions (tons)
Natural Gas Combustion	(f) Monthly Throughput (mmcf)	(g) Emission Factor (lbs/mmcf)	(h) Ind. HAP emissions (tons)
(i) Total Individual HAP emissions calculated for this month, in Tons			
(j) 12-month rolling Individual HAP emissions total (l) from previous month's Attachment B, in Tons			
(k) Monthly Individual HAP emissions total (i) from previous year's Attachment B, in Tons			
(l) Current 12-month rolling total emissions this specific HAP in Tons: [(j) + (k) - (l)]			

- (a) Record all materials that emit this specific HAP from this installation;
- (b) Record the amount of HAP emissions already calculated for Attachment A in [e] in Tons;
- (c) Record the amount of monthly throughput from the Electric Arc Welder
- (d) Record the specific HAP emission factor for the Electric Arc Welder taken from SCC 30905254 if applicable.
- (e) Calculate the HAP emissions from the Electric Arc Welder: (f) = [(c) x (d)] / 2000
- (f) Record the amount of monthly throughput of natural gas used by SAF-Holland, Inc.
- (g) Record the specific HAP emission factor for Natural Gas Combustion taken from AP-42, Section 1.4 if applicable.
- (h) Calculate the HAP emissions from Natural Gas Combustion: (h) = [(g) x (h)] / 2000
- (i) Sum each HAP emission for this month: (i) = [sum of all HAP emission in (b)] + (e) + (h)
- (j) Record the 12-month HAP emission total (l) from previous month's Attachment B, in Tons
- (k) Record the Monthly HAP emissions total (i) from previous year's Attachment B, in Tons.
- (l) Calculate the current 12-month HAP emission total in Tons: [(i) + (j) - (k)]. A value less than 10.0 tons of HAPs indicates compliance.



**ATTACHMENT D**  
**Monthly VOC Emission Tracking Record**

This sheet covers \_\_\_\_\_ (Copy this sheet as needed.)  
(month, year)

(a)	(b)	(c)	(d)	(e)
Material (Name, Product #)	Amount of Material used (gallons/month)	Density (lb/gal)	VOC Content (Weight %)	VOC Emissions (MMscf/month)
Example: Cyan Blue Base/D947 (90002141/54447-116)	10	7.73	73.14%	0.0283
Total Natural Gas Combustion	(f) Amount of Natural Gas Used (MMcf/month)	(g) Emission Factor (lb/MMcf)		(h)
		5.5		
(i) Total VOC Emissions Calculated for this Month in Tons				
(j) 12-month VOC Emissions Total (l) from Previous month's Worksheet in Tons				
(k) Monthly VOC Emissions Total (i) from Previous Year's Worksheet in Tons				
(l) Current 12-month Total of VOC Emissions in Tons: (l) = [(i) + (j) - (k)]				

- (a) Record the names of each paint, coating, dilution solvent, resin, varnish, finishing product or solvent for which the SDS indicates VOC with (VOCs) used as a separate entry in the table that were used this month.
- (b) Record the respective gallons of paint, coating, dilution solvent, resin, varnish, finishing product or solvent used this month. If specific gravity is provided, Density (lb/gal) = specific gravity x 8.33.
- (c) Record the respective density of paint, coating, dilution solvent, resin, varnish, finishing product or solvent from the SDS
- (d) Record the Respective VOC content of paint, coating, dilution solvent, resin, varnish, finishing product or solvent. Obtain VOC content of paint, coating, dilution solvent, resin, varnish, finishing product or solvents from their respective SDS. If a range is given for the VOC content, use the highest in the range.
- (e) Calculate VOC emissions from paint, coating, varnish, inks, solvents, additives, etc: (e) = [(b) x (c) x (d)] / 2000.
- (f) Record the MMcf of natural gas used by SAF-Holland, Inc. during this month.
- (g) VOC emission factor for natural gas combustion taken from SCC 10200603.
- (h) Calculate VOC emissions from natural gas combustion: (h) = [(f) x (g)] / 2000
- (i) Sum each individual VOC emissions for this month: (i) = [sum of all VOC emissions in (e)] + (h)
- (j) Record the 12-month rolling total VOC emissions (l) from last month's Attachment D.
- (k) Record the monthly VOC emissions total (i) from previous year's Attachment D.

Calculate the current 12-month rolling total VOC emissions. **A value of less than 100.0 tons of VOC indicates compliance.**













# STATEMENT OF BASIS

## **Voluntary Limitations**

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

## **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received June 6, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received April 3, 2014;
- 3) 2012 Emissions Inventory Questionnaire, received April 1, 2013;
- 4) 2011 Emissions Inventory Questionnaire, received March 30, 2012;
- 5) 2010 Emissions Inventory Questionnaire, received March 30, 2011;
- 6) 2009 Emissions Inventory Questionnaire, received June 10, 2010;
- 7) Construction Permit 0893-027;
- 8) Construction Permit 0296-003;
- 9) Construction Permit 0296-003A;
- 10) Construction Permit 112008-010;
- 11) Application for Authority to Construct, Project 2008-07-088;
- 12) Permit to Operate OP2009-042;
- 13) WebFIRE; and
- 14) 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.

None.

## **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.

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

The installation is not subject to these regulations unless they undertake any projects that involve any asbestos containing materials.

**Construction Permit History**

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

Construction Permit Number 0893-027

This permit was issued on August 11, 1993 to authorize the installation of one (1) additional paint spray booth to spray primers. There are several special conditions associated with the construction permit. The installation cannot use more than 15,000 gallons of primer in any consecutive 12-month period, and the VOC content of the primer shall not exceed 4.62 pounds per gallon. Monthly records of these values shall be kept for each primer used in the paint booth. The limit on Attachment H states that a value of less than 34.5 tons of VOC indicates compliance. This value was derived based on the limits of 15,000 gallons of primer and a maximum VOC content of 4.62 pounds per gallon in the primer.

$$15,000 \text{ gal} * 4.62 \frac{\text{lb}}{\text{gal}} * \frac{1 \text{ ton}}{2000 \text{ lb}} = 34.65 \text{ tons}$$

Construction Permit 0296-003

This permit was issued on January 31, 1996 to authorize the construction of an additional paint line and associated equipment. The new line consist of heated alkaline wash system, a heated iron phosphate wash system, a seal rinse system, a drying oven, two painting systems, a preheat oven, two curing ovens, and a heat cleaning oven, with a special condition that the installation shall not burn Teflon<sup>®</sup>, chlorinated plastics, or trash in the heat cleaning oven.

Construction Permit Number 0296-003A

This permit was issued on December 29, 2006 to amend construction permit 0296-003 to add an installation wide HAP emission limit of ten (10) tons individually and twenty-five (25) tons combined in any consecutive 12-month rolling average period. The amendment was requested due to a modification to the painting operation when the facility switched coatings from a solvent based coating to an aqueous based coating.

Construction Permit Number CP112008-010

This permit was issued on November 24, 2008 to authorize the installation of equipment for a new metals preparation and coating process. Special Condition 3.C. contains a typographical error. As written in the construction permit Special Condition 3.C states, "Attachment C or equivalent forms shall be used to show compliance with Special Condition 2.A through 2.B." However, the intent of this recordkeeping attachment is to demonstrate compliance with Special Condition 3.A and 3.B. In this operating permit the type has been corrected to reflect the intent.

**New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60 Subpart Dc, *Standards of Performance for Small Industrial Steam Generating Units*

The regulation applies to steam generating units for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input of 29 megawatts (100 MMBtu/hr) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

The facility is not subject to this subpart based on §60.40c(a). From the 2013 EIQ, the maximum design heat input is less than ten (10) MMBtu/hr so this regulation does not apply.

**Maximum Achievable Control Technology (MACT) Applicability**

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

The regulation applies to individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machines that use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvent, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

This subpart does not apply to this installation since the installation does not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform as a cleaning or drying agent.

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

This subpart establishes national emission standards for hazardous air pollutants for miscellaneous metal parts and products surface coating facilities.

The subpart does not apply to the installation since it is not a major source for HAPs per §63.3881(b).

40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

This subpart establishes national emission limitations and work practice standards for HAPs emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP.

This subpart does not apply to this installation since it is not a major sources of HAPs per §63.7485.

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 establishes national emission standards for HAPs for area sources involved paint stripping and miscellaneous surface coating operations.

This subpart does not apply to this installation since the installation does not perform paint stripping using methylene chloride or perform spray application of coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium per §63.11170(a)(1) and §63.11170(a)(2). In the event that a paint stripping method is used that uses methylene chloride or perform spray application of coatings that contain the listed metal, the permittee will need to submit a permit amendment since the facility will then be subject to this regulation.

40 CFR Part 63 Subpart JJJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

This subpart applies to industrial, commercial, or institutional boilers located at, or is part of, an area source of HAPs.

This subpart does not apply to this installation since each boiler used at the installation burns only gaseous fuels not combined with any liquid or solid fuels per §63.11195(e).

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 primarily engage in operations listed in section §63.11514 (a)(1) through (a)(9).

This subpart does not apply to this installation since the installation is not primarily engaged in the operations in one of the nine source categories listed in §63.11514 (a)(1) through (a)(9).

**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.

None.

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
CO	6.95
Individual HAPs	<10.0
Total HAPs	<25.0
NO <sub>x</sub>	8.27
PM <sub>10</sub> <sup>2</sup>	14.37
PM <sub>2.5</sub> <sup>2</sup>	12.72
SO <sub>x</sub>	0.05
VOC	<100.0

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of controlled annual operation unless otherwise noted. PTE includes emission limitations of the permit.

<sup>2</sup>The emissions for EP12, EP31, and EP35-EP37 were considered both PM<sub>10</sub> and PM<sub>2.5</sub> since they were based off the MSDS values for density and MHDR. The emission units were given 99% control efficiency for PM10 and PM2.5 as they are required to operate fabric filters by Permit Condition 4.

**Other Regulatory Determinations**

10 CSR 10 – 6.220, *Restriction of Emissions of Visible Air Contaminants*

This rule establishes the maximum allowable opacity of visible air contaminant emissions.

Although the installation has emission sources that emit visible air contaminants, opacity monitoring is not required in this permit. EP-14, Lumber Sawing – Pallet Wood, has PM PTE less than 0.0004 lbs/hr. EPA1, Electric Arc Welding has PM PTE less than 0.36 lbs/hr. All combustion units are natural gas fired with potential emissions less than 0.5 lb PM/hr. Due to these potential emission rates, visible emissions are not expected. Therefore no monitoring or recordkeeping is required for these units.

The painting systems have a PM PTE of 1.3 lbs/hr, therefore monitoring is required of these emission units.

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

This rule establishes the maximum allowable concentration of sulfur compounds in source emissions and in the ambient air.

This rule does not apply to any of the combustion equipment at the installation since all are fueled by pipeline grade natural gas per 6.260(1)(A)2.

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

The rule provides conditional exemptions that can be met by operation, monitoring, and maintenance procedures. In order for the conditional exemption to be maintained, fabric filter systems must be used at all time in EP-12, EP-31, EP-35, and EP-37 which is required in Permit Condition 4. By remaining in compliance with Permit Condition 4, the permittee will remain in compliance with 10 CSR 10-6.400.

EP-14 and EPA1 meet the conditional exemption requirement of §6.400(1)(B)12 as demonstrated below. §6.400(1)(B)12 states that emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hours of particulate matter are exempt from this regulations.

EU #	Description	MHDR (MoEIS)	Emission Factor <sup>1</sup>	Potential to Emit
EP-14	Lumber Sawing – Pallet Wood	0.01 (tons/hr)	0.2 (lb PM/ton)	0.002 (lb/hr)
EPA1	Electric Arc Welding	0.07 (1000 lb/hr)	5.2 (lb PM <sub>10</sub> /1000 lb)	0.364 (lb PM <sub>10</sub> /hr)

<sup>1</sup>The EF for EP-14 was taken from AP 42 Table 10.6.4-7 and the EF for EPA1 was taken from WebFIRE using SCC 30905254.

EP-35 and EP-36 (Vac-U-Paint Spray System) meet the conditional exemption requirements of §6.400(1)(B)14 by meeting Permit Condition 4. Compliance is assured with the equipment and operating permit parameters in the permit condition. §6.400(1)(B)14 states that coating operations equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers’ specifications or comparable maintenance procedures that meet or exceed manufacturers’ specifications.

10 CSR 10 – 6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect heating*

This rule restricts the emission of particulate matter for installations in which fuel is burned for the primary purpose of producing steam, hot water, or hot air or other indirect heating of liquids, gases, or solids and the products of combustion do not come into direct contact with process materials.

This rule does not apply to any of the indirect heating units at the installation since all are fueled by natural gas per 6.405(1)(C).

**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: March 11, 2015  
TO: 2014-06-030  
FROM: Jacob Robinett, Operating Permit Unit  
SUBJECT: Response to Public Comments

Ten comments were received during the public comment period. Comments were received from Robert Cheever, Environmental Engineer for U.S. EPA Region 7, on Friday, December 5, 2014. The comments are addressed in the order in which they appear within the letter.

**Comment #1:** Plant wide Permit Condition PW001 establishes a voluntary annual limit of volatile organic compounds (VOCs) “for the entire installation” in any “consecutive 12-month rolling average period.” For long-term emission limitations to be practically enforceable, compliance must be determined, at a minimum, on a 12-month rolling total basis; not on a rolling average basis. Therefore, EPA recommends MDNR change the emission limitation to a rolling total basis. Additionally, if this limitation is being placed on the equipment on-site at the time of the 2006 operating permit application, then EPA recommends MDNR specify the emission units which make up the “entire installation” subject to the VOC emission limitation.

**Response to Comment:** The emission limitation has been changed to a “consecutive 12-month period” instead of a “consecutive 12-month rolling average period.” Sentences have been added to the list of Emission Points with Limitations and Emission Points without Limitations to explain what equipment is to be considered for plant wide limitations.

**Comment #2:** Plant wide Permit Condition PW002 establishes an annual limit of hazardous air pollutants (HAPs) “for the entire installation” in any “consecutive 12-month rolling average period.” For long-term emission limitations to be practically enforceable, compliance must be determined, at a minimum, on a 12-month rolling total basis; not on a rolling average basis. Therefore, EPA recommends MDNR change the emission limitation to a rolling total basis. Additionally, if this limitation is being placed on the equipment on-site at the time when construction permits #0296-003A and #112008-010 were issued, then EPA recommends MDNR specify the emission units which make up the “entire installation” subject to the HAP emission limitation.

**Response to Comment:** The emission limitation has been changed to a “consecutive 12-month period” instead of a “consecutive 12-month rolling average period.” Sentences have been added to the list of Emission Points with Limitations and Emission Points without Limitations to explain what equipment is to be considered for plant wide limitations.

**Comment #3:** Plant wide Permit Condition PW003 incorporates the applicable requirements associated with 10 CSR 10.6.220 and includes emission limitations and deviation reporting. However, the permittee is not required to conduct the required monitoring and record keeping applicable to 10 CSR 10-6.220. EPA is concerned as to how a permittee determines and reports deviations without performing monitoring. In many permit to operate, MDNR customarily includes the requirements associated with 10 CSR 10-6.220 in Section IV; Core Permit Requirements; which include the minimum monitoring and record keeping necessary to verify compliance. EPA suggests MDNR reconsider including the basic monitoring and record keeping normally associated with 10 CSR 10-6.220 included in most Section IVs. Also, EPA suggest that the emission limitations be worded to indicate the “permittee” is responsible and not “owner or other person.”

**Response to Comment:** The permit has been modified to indicate the “permittee” is responsible and not “owner or other person.” The permit has been modified as requested, as well as monitoring and recordkeeping have been included.

**Comment #4:** Emission limitation #2 in Permit Condition 1 requires “the applicant” to undertake a program to correct the problem. This requirement is a “permit condition” in an “operating permit” and EPA recommends MDNR revise the wording to reflect.

**Response to Comment:** “The applicant” has been changed to “the permittee.”

**Comment #5:** Monitoring and record keeping requirements in Permit Condition 1 require the permittee to maintain monthly and rolling 12-month records detailing the amount and VOC content of materials used in emission unit EP12. However, MDNR’s customary practice is to include, as an attachment, a sample data collection methodology to be used by the permittee to track compliance. Therefore, EPA recommends MDNR and SAF-Holland provide the appropriate compliance verification datasheet used to track the monthly and 12-month total VOC from EP12.

**Response to Comment:** Attachment H has been added to the permit to provide a tracking sheet for the monthly and 12-month total VOC emissions from EP12. The permit condition has been modified to reference the attachment.

**Comment #6:** Permit Condition 2 incorporates one applicable requirement from construction permit #0296-003A; while Permit Condition PW002 incorporates other applicable requirements from construction permit #0296-003A. EPA recommends MDNR move the applicable requirement in permit condition 2 to permit condition PW002. If not, then permit condition 2 should include a monitoring and or record keeping requirement to verify compliance with the operational specification.

**Response to Comment:** The HAP limitation is included in Permit Condition PW002 because it applies to all emission units with the potential to emit HAPs. The limit in Permit Condition 2 applies only to the heat cleaning oven. Permit Condition 2 has been modified by adding monitoring/record keeping and reporting requirements.

**Comment #7:** The wording of monitoring and record keeping requirement included in Permit Condition 3 does not agree with the explanation given under Construction Permit #112008-010 in the Construction Permit History portion of the Statement of Basis. EPA suggests MDNR review and coordinate the wording so that there is agreement between the Statement of Basis and Permit Condition 3.

**Response to Comment:** Statement of Basis has been revised to clarify and explain the Special Conditions of Construction Permit #112008-010.

**Comment #8:** The items listed under the equipment and operation parameters portion of Permit Condition 4 appear to be the listing of tasks and EPA would suggest to MDNR that the wording be modified to indicate that these are requirements that the permittee must undertake.

**Response to Comment:** The wording of the items listed under the equipment and operation parameters portion of Permit Condition 4 have been modified to clarify that these are requirements that the permittee must undertake.

**Comment #9:** It appears that some of the emission factors used within the attachments for compliance verification came from WebFIRE; however, WebFIRE is not shown as a permit reference document in the Statement of Basis. EPA suggests MDNR add WebFIRE to the list of permit reference documents.

**Response to Comment:** The Statement of Basis has been modified to add WebFIRE to the list of permit reference documents.

**Comment #10:** The Other Regulatory Determinations section in the Statement of Basis includes a discussion on 10 CSR 10-6.400. The sentence directly before the first tabular presentation says: "The units are in compliance as demonstrated below by having a controlled PTE less than the Emission Rate of the unit." MDNR appears to indicate this statement is included in §6.400(1)(B)14. However, §6.400(1)(B)14 says: "Coating operations equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers specification or comparable maintenance procedures that meet or exceed manufacturers' specifications." §6.400(1)(B)14 by itself would appear to exempt these two (2) emission points and EPA is unclear as to the origin of this statement. EPA suggests MDNR review the discussion under 10 CSR 10-6.400 and remove extraneous statements.

**Response to Comment:** The Statement of Basis has been modified to clearly reflect the exemptions.