



Missouri Department of Natural Resources
Air Pollution Control Program

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 here in.

Intermediate Operating Permit Number: OP2010-134
Expiration Date: JAN 04 2016
Installation ID: 071-0020
Project Number: 2009-05-024

Installation Name and Address

Steelweld Equipment Co., Inc.
235 North Service Road
St. Clair, MO 63077
Franklin County

Parent Company's Name and Address

Steelweld Equipment Co., Inc.
P.O. Box 440
St. Clair, MO 63077

Installation Description:

Steelweld Equipment Co., Inc. manufactures and paints cabinets for light duty trucks. The installation has been operating at the site in St. Clair, Missouri, for over 25 years. Their processes also include metal stamping and forming as well as welding, assembly and finishing. The installation is part of the St. Louis ozone nonattainment area. The installation is a synthetic minor source of Volatile Organic Compounds (VOC).

JAN 05 2011

Effective Date


Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Steelweld Equipment Co., Inc. manufactures and paints cabinets for light duty trucks. The installation has been operating at the site in St. Clair, Missouri for over 25 years. Their processes also include metal stamping and forming as well as welding, assembly and finishing. The installation is part of the St. Louis ozone nonattainment area. The installation is a synthetic minor source of Volatile Organic Compounds (VOC).

Reported Air Pollutant Emissions, tons per year						
Year	Particulate Matter ≤ Ten Microns (PM ₁₀)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Hazardous Air Pollutants (HAPs)
2009	0.007	0.001	0.10	11.20	0.08	0.10
2008	0.04	0.001	0.20	15.94	0.17	1.41
2007	0.007	0.001	0.18	31.43	0.15	3.61
2006	0.006	0.0009	0.16	21.22	0.13	4.69
2005	0.006	0.001	0.16	17.56	0.13	2.78

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.

Emission Unit #	Description of Emission Unit
1a	Paint Booth #1 Prime Coating
2a	Paint Booth #2 Prime Coating
3a	Paint Booth #3 Prime Coating
1A	Curing Oven
1b	Paint Booth #1 Top Coating
2b	Paint Booth #2 Top Coating
3b	Paint Booth #3 Top Coating
1d	Solvent/Thinner for Gun Cleaning
2d	Solvent/Thinner for Gun Cleaning
3d	Solvent/Thinner for Gun Cleaning
6	Rustproofing Using Wax Spray
9	Roof Coating

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source
5 Prep Room Vent – Degreasing (Manual Wipe)
7 Caulking Of Body Seams
8 Maintenance Operations

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

Construction Permit No. 072003-004, Issued June 19, 2003

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 10-6.060 Construction Permits Required
Construction Permit No. 072003-004, Issued June 19, 2003

Emission Limitations:

1. Special Condition 1.B: The permittee shall emit less than ten (10) tons individually of Hazardous Air Pollutants (HAPs) from the installation in any consecutive twelve-month period.
2. Special Condition 1.B: The permittee shall emit less than twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive twelve-month period.

Monitoring/Record Keeping:

1. The permittee shall record the amount of each HAP emitting material used each month.
2. The permittee shall calculate the monthly and rolling twelve-month HAP emissions for each individual HAP and for total combined HAP using Attachments A & B or equivalent forms generated by the permittee.
3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all material used at the installation.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 10 tons individual or 25 tons combined should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons per year of volatile organic compounds (VOCs) from the installation in any consecutive twelve-month period.

Monitoring/Record Keeping:

1. The permittee shall record the amount of each VOC emitting material used each month.
2. The permittee shall calculate the monthly and rolling twelve-month VOC emissions using Attachment C or an equivalent form generated by the permittee.

3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all material used at the installation.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001		
10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations		
Emission Unit	Description	Manufacturer/Model #
1a	Paint Booth #1 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
2a	Paint Booth #2 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
3a	Paint Booth #3 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
1b	Paint Booth #1 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
2b	Paint Booth #2 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
3b	Paint Booth #3 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
9	Roof Coating	-

Emission Limitation:

The permittee shall not emit or discharge into the atmosphere any VOCs from these emission units in excess of 3.5 pounds VOC per gallon of coating (minus water and non-VOC organic compounds) on the basis of a daily volume weighted average of all coatings, except when using compliant coatings.

Monitoring:

1. The following procedures shall be used for determining the daily volume-weighted average (DAVG_{VW}) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
 - a) Calculate the DAVG_{VW} of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i + B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

- b) The composition of the coatings shall be determined by formulation data supplied by the manufacturer or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
- c) The above daily volume-weighted calculation is not necessary if all coatings used are compliant coatings.

Record Keeping:

1. Records detailing specific VOC sources, as necessary to determine compliance, shall be kept. These may include:
 - a) The type and the quantity of coatings used daily;
 - b) The coating manufacturer's formulation data for each coating;
 - c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
 - d) Test results that determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) The type and quantity of waste solvents reclaimed or discarded daily;
 - f) The quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
2. Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the Air Pollution Control Program that such records are adequate for the purpose of this rule.
3. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' Air Pollution Control Program personnel upon request.

Reporting:

1. If at any time the 3.5 pounds VOC/gallon of coating emission limit should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit No. 072003-004, Issued June 19, 2003		
Emission Unit	Description	Manufacturer/Model #
1a	Paint Booth #1 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
2a	Paint Booth #2 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
3a	Paint Booth #3 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
1A	Curing Oven 1.6 MMBtu/h 06/19/2003	-
1b	Paint Booth #1 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
2b	Paint Booth #2 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
3b	Paint Booth #3 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
1d	Solvent/Thinner for Gun Cleaning 06/19/2003	Bleeker Brothers, Inc./Single Load
2d	Solvent/Thinner for Gun Cleaning 06/19/2003	Bleeker Brothers, Inc./Single Load
3d	Solvent/Thinner for Gun Cleaning 06/19/2003	Bleeker Brothers, Inc./Single Load
9	Roof Coating	-

Emission Limitation:

Special Condition 1.A: The permittee shall emit less than 40 tons of volatile organic compounds (VOCs) from paint booths #1 - #3 (Emission Units: 1a, 1b, 1d, 2a, 2b, 2d, 3a, 3b, 3d), curing oven (Emission Unit 1A), and roof coating (Emission Unit 9) in any consecutive twelve-month period.

Operational Requirement:

Special Condition 2: A panel filter must be in use at all times when the paint booths #1 - #3 (Emission Units: 1a, 2a, 3a) are in operation and shall be operated and maintained in accordance with the manufacturer's specifications.

Monitoring/Record Keeping:

1. The permittee shall record the amount of each VOC emitting material used each month.
2. The permittee shall calculate the monthly and rolling twelve-month VOC emissions using Attachment D or an equivalent form generated by the permittee.
3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all material used at the installation.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 40 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.

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

PERMIT CONDITION 003		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
Emission Unit	Description	Manufacturer/Model #
1a	Paint Booth #1 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
2a	Paint Booth #2 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
3a	Paint Booth #3 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
1A	Curing Oven 1.6 MMBtu/h 06/19/2003	-

Emission Limitation:

1. No owner or other person shall 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:

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) 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 weeks for a period of eight (8) 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 daily monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments E & F), 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, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources		
Emission Unit	Description	Manufacturer/Model #
1a	Paint Booth #1 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
2a	Paint Booth #2 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
3a	Paint Booth #3 Prime Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
1b	Paint Booth #1 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
2b	Paint Booth #2 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
3b	Paint Booth #3 Top Coating 06/19/2003	Bleeker Brothers, Inc./Single Load
1d	Solvent/Thinner for Gun Cleaning 06/19/2003	Bleeker Brothers, Inc./Single Load
2d	Solvent/Thinner for Gun Cleaning 06/19/2003	Bleeker Brothers, Inc./Single Load
3d	Solvent/Thinner for Gun Cleaning 06/19/2003	Bleeker Brothers, Inc./Single Load
6	Rustproofing Using Wax Spray	-
9	Roof Coating	-

For an existing affected source, the compliance date is January 10, 2011. [§63.11172(b)]

General Requirements:

1. Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in Paragraphs (e)(1) through (e)(5) of this section. [§63.11173(e)]
 - a) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in Paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in Paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. [§63.11173(e)(1)]
 - b) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of Paragraph (e)(2)(i) of this section and either Paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section. [§63.11173(e)(2)]

- i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see §63.14 of Subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
[§63.11173(e)(2)(i)]
- ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure. [§63.11173(e)(2)(ii)]
- iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process. [§63.11173(e)(2)(iii)]
- iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.
[§63.11173(e)(2)(iv)]
- c) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see §63.14 of Subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles

that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

[§63.11173(e)(3)]

- d) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [§63.11173(e)(4)]
 - e) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2). [§63.11173(e)(5)]
2. Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by Paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in Paragraphs (f)(1) through (f)(3) of this section. [§63.11173(f)]
- a) A list of all current personnel by name and job description who are required to be trained; [§63.11173(f)(1)]
 - b) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in Paragraphs (f)(2)(i) through (2)(iv) of this section. [§63.11173(f)(2)]
 - i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate. [§63.11173(f)(2)(i)]
 - ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. [§63.11173(f)(2)(ii)]
 - iii) Routine spray booth and filter maintenance, including filter selection and installation. [§63.11173(f)(2)(iii)]
 - iv) Environmental compliance with the requirements of this subpart. [§63.11173(f)(2)(iv)]
 - c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters. [§63.11173(f)(3)]
3. As required by Paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in Paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. [§63.11173(g)]
- a) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in Paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed. [§63.11173(g)(2)]

- b) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years. [§63.11173(g)(3)]

Notifications:

1. Notification of Compliance Status. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in Paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in Paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status: [§63.11175(b)]
 - a) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. [§63.11175(b)(1)]
 - b) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g). [§63.11175(b)(2)]
 - c) The date of the Notification of Compliance Status. [§63.11175(b)(3)]

Recordkeeping:

If you are the owner or operator of a surface coating operation, you must keep the records specified in Paragraphs (a) through (d) and (g) of this section.

1. Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed. [§63.11177(a)]
2. Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i). [§63.11177(b)]
3. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4). [§63.11177(c)]
4. Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176. [§63.11177(d)]
5. Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. [§63.11177(g)]
6. Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report. [§63.11177(h)]
7. If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. [§63.11178(a)]

Reporting:

1. Annual Notification of Changes Report. If you are the owner or operator of a motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in Paragraphs (a)(1) through (2) of this section. [§63.11176(a)]
 - a) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different. [§63.11176(a)(1)]
 - b) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. [§63.11176(a)(2)]
2. The permittee shall report any deviations from the general requirements, notifications, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 005		
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)		
Emission Unit	Description	Manufacturer/Model #
6	Rustproofing Using Wax Spray	-

Emission Limitation:

The permittee shall not emit or discharge into the atmosphere any VOCs from this emission unit in excess of 5.4 pounds VOC per gallon of coating (minus water and non-VOC organic compounds) on the basis of a daily volume weighted average of all coatings, except when using compliant coatings.

Monitoring:

1. The following procedures shall be used for determining the daily volume-weighted average (DAVG_{VW}) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
 - a) Calculate the DAVG_{VW} of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i + B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

- b) The composition of the coatings shall be determined by formulation data supplied by the manufacturer or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
- c) The above daily volume-weighted calculation is not necessary if all coatings used are compliant coatings.

Record Keeping:

1. Records detailing specific VOC sources, as necessary to determine compliance, shall be kept. These may include:
 - a) The type and the quantity of coatings used daily;
 - b) The coating manufacturer's formulation data for each coating;
 - c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
 - d) Test results that determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) The type and quantity of waste solvents reclaimed or discarded daily;
 - f) The quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
2. Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the Air Pollution Control Program that such records are adequate for the purpose of this rule.
3. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' Air Pollution Control Program personnel upon request.

Reporting:

1. If at any time the 5.4 pounds VOC/gallon of coating emission limit should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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

- 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.

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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:

1. St. Louis metropolitan area. The open burning of household refuse is prohibited;
- (B) Yard waste, with the following exceptions:
 1. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) 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.
- (4) Steelweld Equipment Co., Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Steelweld Equipment Co., Inc. fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or 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.
- (6) 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 10-5.160 Control of Odors in the Ambient Air

This requirement is not federally enforceable.

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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 10-6.080 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 10-6.250 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.

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
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- 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)(C)1 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's 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 semi-annually (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's 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. 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 Ms. Elaine B. Hunter, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Missouri Department of Natural Resources 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 E
 Method 9 Opacity Emissions Observations

Company						Observer		
Location						Observer Certification Date		
Date						Emission Unit		
Time						Control Device		
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End	Sum	Average				

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation?

 YES NO Signature of Observer

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, May 11, 2009;
- 2) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 3) 2009 Missouri Emissions Inventory Questionnaire.

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

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

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable because the primer and curing oven both emit particulate matter.

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 10-5.030 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used For Indirect Heating* is applicable but was not included because the curing oven only emits 0.002942 lb/MMBtu while burning natural gas which is far below the emission limit of 0.6 lb/MMBtu for emission units of less than 10 MMBtu/hr MHDR.

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* is not applicable to the installation. The following PM emission units are exempted under 10 CSR 10-6.400(1)(B)12 as they have the potential to emit less than 0.5 lbs PM/hr:

Emission Unit	Potential PM Emission Rate (lb/hr)
1a Paint Booth #1 Primer	0.09
2a Paint Booth #2 Primer	0.09
3a Paint Booth #3 Primer	0.09

Construction Permit Revisions

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

Construction Permit No. 072003-004, Issued June 19, 2003:

- As written within the construction permit, Special Condition No. 2 applies to paint booths EP-1, EP-2, and EP-3. Since the writing of the permit the emission point numbering at the installation has changed. EP-1 was split into 1a prime coating, 1b top coating, 1c roof coating, 1d solvent/thinner, and 1A curing oven. EP-2 was split into 2a prime coating, 2b top coating, and 2d solvent/thinner. EP-3 was split into 3a prime coating, 3b top coating, and 3d solvent/thinner. Since 1c roof coating does not actually occur within the paint booth, the installation relabeled the roof coating 9; however, since the roof coating was evaluated and permitted within the de minimis construction permit, the roof coating emissions now reported under 9 must be included within the 40 ton/yr VOC cap within Special Condition No. 2.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart MM, *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations* is not applicable because the regulation only applies to automobile or light-duty truck assembly plants.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 60 Subpart IIII, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks* is not applicable because the regulation only applies to major HAP sources. This installation is minor for HAPs.

40 CFR Part 60 Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* is not applicable because the regulation only applies to major HAP sources. This installation is minor for HAPs.

40 CFR Part 60 Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is applicable to the installation and has been applied within this permit (see Permit Condition 004).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Other Regulatory Determinations

10 CSR 10-5.330 *Control of Emissions From Industrial Surface Coating Operations* is applicable to the installation and has been applied within this permit (see Permit Condition 001). Emission Units 1a, 2a, and 3a for prime coating; 1b, 2b, and 3b for top coating; and 9 for roof coating are considered “air dried” extreme performance coatings – despite prime coatings and top coatings curing within an oven (the roof coating is not placed cured within an oven), as the curing oven operates at approximately 165°F (a baked coating is a coating cured at temperature above 194°F). This regulation is not applicable to:

- 1d, 2d, and 3d Solvent/Thinner for Gun Cleaning as these emission points only report gun cleaning VOC emissions and do not include any emissions from surface coating operations.
- 1A Curing Oven as this emission point only accounts for VOC emissions from combustion products. The installation assumes no VOC emissions from flashoff as they report 100% of their VOC as being emitted within the paint booths, rather than in this oven.
- 8 Maintenance Operations as this emission point does not involve surface coating operations covered under the rule. 8 was previously known as Maintenance and Touchup Operations, but discussions with the installation’s consultants have clarified that touchup operations do not occur under this emission point.
- It is unclear if 6 Rustproofing Using Wax Spray is currently subject to this regulation; however, a proposed revision of this regulation would be applicable to the emission unit. The proposed revision would apply a 5.4 lbs VOC per gallon limitation to the emission unit. As it is unclear if the emission unit is subject to the regulation as currently worded (i.e. unclear which emission limitation is applicable); the installation has accepted to voluntarily comply with the proposed emission limitation prior to the promulgation of the final revision (see Permit Condition 005).

An updated Potential To Emit for the installation is shown below:

Pollutant	Potential To Emit ¹ (tons/yr)
CO	0.56
NO _x	0.67
PM ₁₀	1.23
SO _x	0.004
VOC	129.84 ²
Hexamethylene-1,6-diisocyanate	0.03
Cumene	0.26
Hexane	0.31
Napthalene	0.74
Ethylbenzene	0.80
Methanol	1.17
Toluene	1.41
Xylene	3.12
Glycol Ethers	9.37 ³
Combined HAP	17.21 ⁴

¹Potential Emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted. VOC Emissions were calculated based upon the usage assumptions made within Construction Permit No. 072003-004. Each of the paint booths was given a 12.25% overall PM control efficiency (35% capture and 35% control) for the panel filters required by Construction Permit No. 072003-004. VOC and HAP emissions from this installation are highly dependent upon the type of coating currently being used.

²In order to obtain this intermediate operating permit, the installation has agreed to a voluntary condition (see Permit Condition PW002) which limits their emissions of VOC to less than the major source threshold of 100 tons/yr.

³Construction Permit No. 072003-0004 Special Condition No. 1.B limits the installation's emission of individual HAPs to 10 tons/yr.

⁴Construction Permit No. 072003-0004 Special Condition No. 1.B limits the installation's emission of combined HAPs to 25 tons/yr.

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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
Environmental Engineer