



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 082009-011 Project Number: 2009-04-041

Parent Company: Leggett & Platt Incorporated

Parent Company Address: 1211 W. Harmony, Neosho, MO 64850

Installation Name: Talbot Industries - Plant #2

Installation Address: 5725 Howard Bush Drive, Neosho, MO 64850

Location Information: Newton County, S16, T24N, R32W

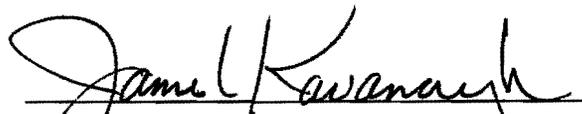
Application for Authority to Construct was made for:

The construction of a 2.4 mmbtu/hour burn-off oven, equipped with a 0.80 mmbtu/hour Incinomite incinerator, that will be used to burn off paint from paint line hooks. Plant #2 also has a support relationship with Plant #1 and these two plants will be considered one installation. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

AUG 20 2009

EFFECTIVE DATE


 DIRECTOR OR DESIGNEE
 DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

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

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

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

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

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

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Permit No.	
Project No.	2009-04-041

SPECIAL CONDITIONS:

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

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

Talbot Industries - Plant 2
Newton County, S16, T24N, R32W

1. Operational Requirements for the Burn-Off Oven
 - A. Talbot Industries shall use this burn-off oven exclusively to remove non-chlorinated/non-hazardous coatings from metal parts.
 - B. Natural Gas shall be the only fuel burned in this burn-off oven.
 - C. Talbot Industries shall use a direct flame afterburner to control emissions from the burn-off oven. The afterburner shall operate between 1,400 to 1,800 degrees Fahrenheit with more than a one-half (½) second residence time to assure a minimum combustion efficiency of 99.9%.
 - D. The burn-off oven shall be equipped with an electronic controller, with digital readout, which is able to monitor and display the temperature in the second combustion chamber to an accuracy of plus or minus two percent (2%).
 - E. The burn-off oven shall have opacity of less than ten percent (10%) at all times. Opacity shall be determined by Method 9 compliance testing.

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

Project Number: 2009-04-041
Installation ID Number: 145-0025
Permit Number:

Talbot Industries - Plant 2
5725 Howard Bush Drive
Neosho, MO 64850

Complete: April 22, 2009

Parent Company:
Leggett & Platt Incorporated
1211 W. Harmony
Neosho, MO 64850

Newton County, S16, T24N, R32W

REVIEW SUMMARY

- Talbot Industries - Plant #2 has applied for authority to construct a 2.4 mmbtu/hour burn-off oven, equipped with a 0.80 mmbtu/hour Incinomite incinerator, that will be used to burn off paint from paint line hooks.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment in insignificant amounts due to the combustion of fuel.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- A direct flame afterburner is being used to control emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The burn-off oven in this permit is classified as an incinerator. All incinerators are required to obtain a permit from the Air Pollution Control Program as mandated in 10 CSR 10-6.060. Potential emissions of criteria air pollutants are less than de minimis levels.
- This installation is located in Newton County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B),

Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- A Basic Operating Permit is required for this installation. The operating permit should include emissions from Talbot Industries – Plant #1 and Plant #2
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Talbot Industries – Plant #2 is a powder coat painting line plant that is not operating under any type of permit. The powder paint line falls under the exemption 10 CSR 10-6.061(3)(A)2.V.(II) for surface coating operations. It is located in Neosho, Missouri. The primary products painted within this facility are wired formed products. Talbot Industries – Plant #1 is a metal wire fabricating shop where all products that need painting go to Plant #2. This support relationship classifies these two facilities as one installation. The existing potential emission will include both plants emissions

No permits have been issued to Talbot Industries - Plant #2 from the Air Pollution Control Program.

PROJECT DESCRIPTION

Talbot Industries – Plant #2 wants to install a 2.4 mmbtu/hour burn-off oven, equipped with a 0.80 mmbtu/hour Incinomite incinerator. The ovens purpose is to burn off the excess paint that is left on the painting hooks during the powder painting process. This oven processes 75 pounds of dry paint per 5 hour burnt-off cycle. The oven and afterburner both use natural gas as its fuel source. The afterburner is a control device for the oven.

Talbot Industries – Plant #1 and Plant #2 will be considered one installation. For permitting purposes both plants will be tracked under the same county plant number of 145-0025. For Emission Inventory Questionnaire (EIQ) purposes Plant #1 will report under county plant number 145-0025 and Plant #2 will report under county plant number 145-0045. Talbot Industries will need a basic operating permit that includes both plants emissions. This can be accomplished by either applying for one single operating permit for both plants or by applying for two separate operating permits for each plant making sure the emissions from both plants are included in each separate operating permit.

Since the coatings from metal parts are burned off, this oven is classified as an incinerator. Therefore, a construction permit is required for this oven according to 10 CSR 10-6.060(1)(B).

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis for Particulate Matter less than ten (10) micrograms per cubic meter (PM₁₀) were obtained from the manufacturer's data provided by the applicant and approved by the compliance testing unit. The emission factors and control efficiencies used in this analysis for Carbon Monoxide (CO), Nitrous Oxides (NO_x), Sulfur Oxides (SO_x), and Volatile Organic Compounds (VOC) were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, 1.4 Natural Gas Combustion, July 1998. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	*Existing Potential Emissions	Existing Actual Emissions (EIQ)	Potential Emissions of the Application	**New Installation Potential Emissions	New Installation Conditioned Potential
PM ₁₀	15.0	0.32	N/A	0.244	0.564	N/A
SO _x	40.0	0.03	N/A	0.01	0.04	N/A
NO _x	40.0	3.83	N/A	1.37	5.20	N/A
VOC	40.0	0.21	N/A	0.08	0.29	N/A
CO	100.0	3.22	N/A	1.15	4.37	N/A
HAPs	10.0/25.0	0.04	N/A	N/A	0.04	N/A

N/A = Not Applicable

* Existing Potential Emission include both Talbot Industries – Plant #1 and Plant #2. They are based on a 0.4 MMBTU/hr dry oven and 2.4 MMBTU/hr cure/bake oven located in Plant #2 and the metal fabricating activities and space heaters in Plant #1. The actual powder paint operation has no stack or fugitive emissions associated with it because of its' complete recycle system.

** New Installation Potential Emissions are the Existing Potential Emissions plus the Potential Emissions of the Application.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The burn-off oven in this permit is classified as an incinerator. All incinerators are required to obtain a permit from the Air Pollution Control Program as mandated in 10 CSR 10-6.060. Potential emissions of criteria air pollutants are less than de minimis levels.

APPLICABLE REQUIREMENTS

Talbot Industries - Plant #2 shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been

verified at the time this application was approved.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065.* All incinerators require a basic operating permit even if their potential emissions are below de minimis. Because Talbot Industries – Plant #1 and Plant #2 are considered the same installation an operating permit is required for both plant either by one operating permit covering both plants or by two operating permits covering each plant. If an operating permit is issued to each plant separately, the emissions from both plant must be considered in each operating permit.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-3.090*

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating, 10 CSR 10-6.400*

STAFF RECOMMENDATION

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

Gerad Fox
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 27, 2009, received April 16, 2009, designating Leggett & Platt Incorporated as the owner and operator of the installation.
- Manufacturer's Data for Controlled Pyrolysis Furnace
- Previous Manufacturer's Data for Controlled Pyrolysis Furnace (Permit # 082006-001)
- Southwest Regional Office Site Survey, dated April 30, 2009.

Mr. Jeff Howrey
Branch Manager
Talbot Industries - Plant 2
5725 Howard Bush Drive
Neosho, MO 64850

RE: New Source Review Permit - Project Number: 2009-04-041

Dear Mr. Howrey:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your new operating permit is necessary for continued compliance. The new operating permit must include the emissions from both Talbot Industries – Plant #1 and Talbot Industries – Plant #2.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Gerad Fox, at the Departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:gfl

Enclosures

c: Southwest Regional Office
PAMS File: 2009-04-041
Permit Number: