

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2018-052
Expiration Date: AUG 13 2023
Installation ID: 047-0075
Project Number: 2015-01-041

Installation Name and Address

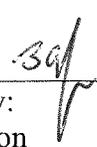
Tnemec Company, Inc.
123 West 23rd Avenue
North Kansas City, MO 64116
Clay County

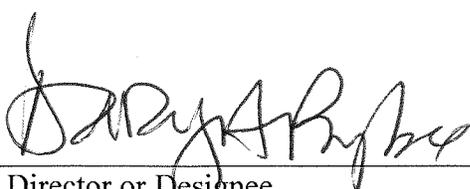
Parent Company's Name and Address

Tnemec Company, Inc.
6800 Corporate Drive
Kansas City, MO 64120

Installation Description:

Tnemec Company, Inc. manufactures specialty high performance paints and coatings in North Kansas City, Missouri. Batch process operations include raw material storage and conveying, milling, wetting in of dry raw materials, product mixing, product tinting and product packaging. Solvent is used to clean most production equipment and the installation operates a still to recover and reuse the cleaning solvents. The installation has limited volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions to remain below the major source level.


Prepared by:
Bern Johnson
Operating Permit Unit


Director or Designee
Department of Natural Resources

AUG 13 2018
Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants.

Due to the large number of individual units in the different operational areas of Tnemec Company, Inc., this document groups and names all emission units into groups of similar function and emission profiles. For example, all air make-up units and space heaters combust natural gas and have the same emission factors. All boilers combust natural gas, but have different emission factors; therefore they form a separate group. Tnemec Company, Inc. keeps a master list of all individual equipment, but tracks emissions for compliance and emission inventory using different labels and descriptions. By grouping similar units together, a simplified emission tracking system for both permit limit compliance and emission reporting can be developed using the custom tracking sheets already in use by Tnemec Company, Inc.

Also, due to the frequent changing of mixing equipment, Tnemec Company, Inc. submits numerous permit determination requests to the Air Program. All have been judged as *de minimis* and no construction permit has been required. The accumulation of very small, but possible incremental increases in emissions has raised concerns that potential-to-emit limits may be exceeded. By using a continuously updated master emission unit list (see Attachment B) for the plantwide VOC and HAP emission limit (see PW 1), these concerns are alleviated as further permit determination requests for small individual mixing equipment are made. The permittee may further resolve this issue by requesting a PAL (plantwide applicability limit) in its next construction permit.

Proposed EP label	Description
EP-BL	Boilers
EP-SP	Air Make-Up Units & Space Heaters
EP-ME	Mixing Equipment
EP-AG	Aggregate Mixing & Handling
EP-ST	Storage Tanks
EP-VE	Vapor Extraction
EP-SB	Spray Booths
EP-EG	Emergency Generator, natural gas, 60 kW

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

The following general conditions apply to all plant wide and emission unit specific conditions in this document, unless otherwise stated.

Monitoring:

The permittee shall calibrate, maintain, and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer's recommendations, or maintenance and operational history of similar units. All calibrations, maintenance, and operations shall occur according to good engineering practices. All manufacturing specifications and operational/maintenance histories shall be kept on site.

Recordkeeping:

- 1) The permittee shall record all required record keeping in an appropriate format.
- 2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations (see Attachment C).
- 3) The permittee shall keep a copy of this operating permit, copies of all issued construction permits, and copies of all Safety Data Sheets (SDS) on site.
- 4) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Reporting:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the end of the month during which the exceedance or event causing the exceedance occurs (unless otherwise specified in the specific condition).
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of any permit condition in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

PERMIT CONDITION PW 1

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitations:

- 1) The permittee shall emit less than 100 tons of VOC in any consecutive 12-month period from the entire installation.
- 2) The permittee shall emit less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of combined HAPs in any consecutive 12-month period from the entire installation.

Operational Limitations:

- 1) The permittee shall maintain master emission unit lists for storage tanks, space heaters, spray booths, and all mixing equipment. It shall submit to the Air Pollution Control Program a written notification of any proposed installation or modification to any tank, heater, spray booth, or mixing equipment at least fifteen calendar days prior to the new addition or modifications. The notification shall include a revised copy of the master list on file (see Attachment B).
- 2) The term "entire installation" in **Emission Limitations:** 1) and 2) will be defined by the contents of the master emission unit list.

PERMIT CONDITION PW 2

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart CCCCCC National Emission Standards for Hazardous Air Pollutants for
Area Sources: Paints and Allied Products Manufacturing

Note: The requirements of this permit condition will be applicable to any units that handle pigments and solids regulated by this rule.

Operational Limitations:

- 1) The permittee shall add dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process. [§63.11601(a)(1)]
 - a) *Process Vessels:* The permittee shall control particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel using one of the following methods: [§63.11601(a)(2)]
 - i) Capture particulate emissions and route them to a particulate control device meeting the visible emissions requirements of 2) below.
 - ii) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel only in paste, slurry, or liquid form.
 - b) *Grinding and Milling Process:* The permittee shall control particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process using one of the following methods:
 - i) Capture particulate emissions and route them to a particulate control device meeting the visible emissions requirements of 2) below.
 - ii) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.

- c) *Grinding and Milling of Materials*: The permittee shall control particulate emissions during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel using one of the following methods:
 - i) Capture particulate emissions and route them to a particulate control device meeting the visible emissions requirements of 2) below.
 - ii) Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
 - iii) Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
- 2) The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere.
 - a) The permittee shall ensure that all new affected emission units are in compliance at the start-up of the unit.

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall perform periodic inspections of each particulate control device as follows:
[§63.11602(a)(2)]
 - a) The permittee shall inspect and maintain each wet particulate control system according to the following requirements:
 - i) Conduct a daily inspection to verify the presence of water flow to the wet particulate control system.
 - ii) Conduct weekly visual inspections of any flexible ductwork for leaks.
 - iii) Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.
 - b) The permittee shall inspect and maintain each dry particulate control unit according to the following requirements:
 - i) Conduct weekly visual inspections of any flexible ductwork for leaks.
 - ii) Conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.
- 2) The permittee shall perform the following visible emissions observations:
 - a) Conduct a 5-minute visual determination of emissions from the particulate control device every 3 months (or upon first use of the equipment following three months of non-use) using Method 22 (40 CFR Part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment.
 - b) If visible emissions are observed for two minutes of the required 5-minute observation period, the permittee shall conduct a Method 203C (40 CFR Part 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment.
 - c) If the Method 203C test runs indicates an opacity greater than 10%, the permittee shall comply with the following requirements:

- i) The permittee shall take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. The permittee must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than 10%, above.
 - ii) The permittee shall prepare a deviation report in accordance with **Reporting Requirements 2(c)**, below, for each instance in which the Method 203C opacity results were greater than 10%, above.
 - iii) The permittee shall resume the visible determinations of emissions from the particulate control device in accordance with the requirements of this section 3 months after the previous visible determination.
- 3) The permittee shall record the results of each inspection and test and perform corrective action as necessary. The permittee shall record the following information for each activity:
 - a) The date, place, and time;
 - b) Person conducting the activity;
 - c) Technique or method used;
 - d) Operating conditions during the activity;
 - e) Results; and
 - f) Description of correction actions taken.
 - 4) The permittee shall keep copies of all reports, notifications, inspections, and tests performed and all documentation supporting any Notification of Applicability and Notification of Compliance Status submitted. The records must be in a form suitable and readily available for expeditious review.
 - 5) The permittee shall keep copies of any determination showing that the provisions of this rule are not applicable to the emission units at the installation.

Reporting Requirements:

- 1) The permittee shall submit the following notifications to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with a copy to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.: [§63.11603(a)]
 - a) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). For existing equipment which commences using, processing, or generating a HAP regulated by this rule [see §63.11599(b)(3)], the Notification of Compliance Status must be submitted within 180 days of the date that the permittee commences processing, using, or generating materials containing HAP, as defined in §63.11607. The Notification of Compliance Status must contain the following information:
 - i) The permittee's name and address;
 - ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
 - b) The permittee shall submit additional notifications specified in §63.9, as applicable.
- 2) The permittee shall prepare an Annual Compliance Certification report as applicable for the emission units subject to this rule according to the following requirements: [§63.11603(b)]
 - a) The reporting period shall be:

- i) Each Annual Compliance Certification report must cover the annual reporting period from January 1 through December 31.
 - b) Each Annual Compliance Certification report shall contain the following information:
 - i) The permittee's name and address;
 - ii) A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, 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; and
 - iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
 - c) Deviation Report. If a deviation has occurred during the reporting period, the permittee shall include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken.
- 3) If the permittee no longer processes, uses, or generates materials containing HAP after December 3, 2009, the permittee shall submit a Notification to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with a copy to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, in accordance with §63.11599(d), which must include the following information:
- a) The permittee's name and address;
 - b) A statement by a responsible official indicating that the facility no longer processes, uses, or generates materials containing HAP, as defined in §63.11607, and that there are no plans to process, use or generate such materials in the future. This statement should also include the date by which the company ceased using materials containing HAP, as defined in 63.11607, and the responsible official's name, title, phone number, e-mail address and signature.

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 1		
10 CSR 10-2.210 Control of Emissions from Solvent Metal Cleaners		
Emission Unit	Description	Manufacturer/Model #
EP-ME - EU6005 only	Mixing Equipment - Cold Solvent Parts Washer	Crystal Clean

Operational Limitation:

- 1) The permittee shall not use cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at twenty degrees Celsius (20°C) in the Cold Solvent Parts Washer.
- 2) The permittee shall ensure the cold cleaner has a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which will limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 3) The permittee shall ensure the cover on the Cold Solvent Parts Washer is closed whenever parts are not being handled in the cleaner or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
 - a) The cold cleaner shall have a drainage facility which will be internal so that parts are enclosed under the cover while draining.
 - b) If an internal drainage facility cannot fit into the cleaning system and the solvent volatility is less than six-tenth pounds per square inch (psi) measured at 100 degrees F, then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
 - c) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until the dripping ceases, whichever is longer.

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall ensure a permanent conspicuous label summarizing the operating procedures is affixed to the equipment.
- 2) The permittee shall ensure only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process are permitted to operate the equipment. The supervisor of any person who operates a solvent metal cleaning process shall receive equal or greater operational training than the operator. Refresher training shall be given to all solvent metal cleaning equipment operators at least once each twelve months.
- 3) If the cold cleaner fails to perform within the operating parameters established, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation of the unit within established parameters.
- 4) The permittee shall ensure solvent leaks are repaired immediately or the solvent parts cleaner shall be shutdown until the leaks are repaired.

- 5) The permittee shall ensure any waste material removed from a cold cleaner is disposed of by one of the following methods or an equivalent method approved by the director and EPA:
 - a) Reduction of the waste material to less than twenty percent VOC solvent by distillation and proper disposal of the still bottom waste; or
 - b) Stored in closed containers for transfer to a contract reclamation service; or a disposal facility approved by the Director and EPA.Waste solvent shall be stored in closed containers only.
- 6) The permittee shall maintain records which include for each purchase of cold cleaning solvent:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in mmHg at 20°C.
- 7) The permittee shall keep records of all types and amounts of solvent containing waste material from the cold cleaner which are transferred to either a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The Director may require additional record keeping if necessary to adequately demonstrate compliance with this rule.
- 8) A record shall be kept of solvent metal cleaning training for each employee.

PERMIT CONDITION 2	
10 CSR 10-6.060 Construction Permits Required Construction Permit 062002-014, Issued June 11, 2002	
Emission Unit	Description
EP-ST	Storage Tanks

Operational Limitations:

- 1) All tanks at the installation which store volatile organic compounds (VOC) with a vapor pressure greater than or equal to 10 kilopascals (kPa) or 1.5 pounds per square inch (psi) at 20 °C shall be equipped with pressure / vacuum conservation vents set at 0.2 kPa (0.029 psi) except where more effective air pollution control is used and has been approved by the Director.
- 2) All stationary VOC containers at the installation with a capacity greater than 250 gallons shall be equipped with a submerged fill pipe or bottom fill, except where more effective air pollution control is used and has been approved by the Director.
- 3) Covers shall be installed on all open-top tanks at the installation used for the production of non-water based coating products. These covers shall remain closed except when production, sampling, maintenance or inspection procedures require operator access.
- 4) Covers shall be installed on all tanks containing VOC used for cleaning equipment. These covers shall remain closed except when operator access is required.

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall maintain monthly records that include the composition and vapor pressure of the materials stored in the tanks at the installation and the vacuum conservation vent settings for each tank.

- 2) At least once each calendar month, the permittee shall monitor and record the setting of pressure/vacuum vent settings on each of the tanks that have been used to store VOC with a vapor pressure greater than or equal to 10 kPa or 1.5 psi within the most recent consecutive 30 day period.
- 3) The permittee shall maintain records that indicate that each open top tank used for the production of non-water base coating products and each tank containing VOC used for cleaning equipment is equipped with a cover. These records shall be maintained for the life of the equipment or a minimum of 5-years after the equipment is removed from service, whichever is longer.

PERMIT CONDITION 3	
10 CSR 10-6.060 Construction Permits Required Construction Permit 012008-003, Issued January 7, 2008	
Emission Unit	Description
EP-AG	Bulk bag unloaders (3)
	Feed Hopper
	Raw Material Conveyors
	Batch Mixer
	Product Conveyor
	Batch Hopper

Emission / Operational Limitation:

- 1) The permittee shall control emissions from the aggregate mixing and materials handling system by enclosing all transfer points with ductwork and venting emission from these transfer points to the cartridge filter.
- 2) The cartridge filter shall be operated and maintained, in accordance with the manufacturer's specifications, to obtain at least 90% control of particulate matter.

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall equip the cartridge filter with a gauge or meter which indicates the pressure drop across the control device. The gauge or meter shall be located such that it may be easily observed by Missouri Department of Natural Resources' personnel.
- 2) The permittee shall maintain the operating pressure drop within the design conditions specified by the manufacturer's performance warranty.
- 3) The permittee shall monitor and record the operating pressure drop across the cartridge filters at least once every 24 hours.
- 4) Replacement filters shall be kept on hand at all times. The filters shall be suitable to the operating conditions that are expected to occur during use.
- 5) The permittee shall maintain an operating and maintenance log (Attachment A or equivalent) for the cartridge filters which includes the following:
 - a) Incidence of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, replacements, etc.

PERMIT CONDITION 4		
10 CSR 10-6.060 Construction Permits Required Construction Permit 062009-008, Issued June 18, 2009 Construction Permit 062009-008B, Issued July 29, 2010		
Emission Unit	Description	Manufacturer/Model #
EP-VE	Dynamic Subsurface Circulation System	Accelerated Remediation Technologies

Emission Limitation:

The permittee shall emit less than 40 tons of VOC from the Accelerated Remediation Technologies' Dynamic Subsurface Circulation System in any rolling 12-month period. [Special Condition 1.A.] (note the plant wide HAP emission limit is more restrictive than the Special Condition 1.B limit, so it has not been repeated here.)

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall conduct performance tests in order to develop emission factors for VOC and HAP emissions from EP-VE. The following schedule shall be used for performance testing:
 - a) Stack testing shall be performed on EP-VE's stack semi-annually as long as the unit is in operation.
 - b) The permittee shall maintain copies of each test summary report as described in 3) below, on-site for a minimum of five years after completion of the test.
- 2) Each time a performance test is conducted, the permittee shall calculate the flow rate from EP-VE in cubic feet per hour (CFH) using the following method:
 - a) Record the vacuum reading (IWC; inches of water column) on the vacuum gauge on the Soil Vapor Extraction (SVE) blower.
 - b) Measure the flow differential (Delta P) in the 4-inch influent line to the blower using the Dwyer Digital Manometer and installed Pilot tube assembly on the 4-inch line.
 - c) Refer to the collection of graphs of Delta P v. Vapor Flow (with calibrated blower curves at 30" to 70" of water column plotted) found in Attachment D to Construction Permit 062009-008A. Find the Delta P value on the Y axis and read across to the blower curve and record the corresponding vapor flow (in SCFM) on the x axis. If the vacuum reading falls outside of the 12" to 70" range of water column plotted and additional graphs are needed Tnemec Company, Inc. shall apply for an amendment within 45 days to receive approval.
 - d) Tnemec Company, Inc. shall keep the digital manometer and the graphs of Delta P for the anticipated range of IWC in the System Controls Building so that flow can be determined as needed.
- 3) The permittee shall calculate VOC and individual HAP emission factors following each performance test.
- 4) The permittee shall calculate an average VOC and individual HAP emission factors following each performance test. The average VOC emission factor shall be calculated by adding each VOC emission factor calculated for each performance test and dividing the total by the total number of performance tests conducted. The average emission factor for each HAP which is monitored shall be calculated in a similar manner.

PERMIT CONDITION 5	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Unit	Description
EP-EG	Emergency Generator, natural gas, 60 kW

Maintenance Standards:

- 1) The permittee shall meet the following maintenance requirements for this unit [Table 2d]:
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - i) The permittee may use an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement.
 - b) Inspect air cleaner every 1,000 hours of operations or annually, whichever comes first; and
 - c) Inspect all hoses and belts every 500 hours of operations or annually, whichever comes first, and replace as necessary.

Operational Standards:

- 1) The permittee shall operate and maintain the emergency RICE and after- treatment control device (if any) according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
- 2) The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
- 3) The permittee shall operate the emergency stationary RICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. [§63.6640(f)]
 - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency stationary RICE for the purpose specified in i) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c) below count as part of the 100 hours per calendar year allowed. [§63.6640(f)(2)]
 - i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph §63.6640(f)(2). Except as provided in i) below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or

non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

[§63.6640(f)(4)(ii)(A) through (E)]

- (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.
- 4) If the permittee does not operate the engine according to the requirements in 1)a) through c) above, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]
- 5) The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Monitoring/Recordkeeping:

The permittee shall maintain an operating and maintenance log using Attachment A or an equivalent.

Reporting:

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 with a copy to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

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.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.250 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.

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
 - 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”;
 - 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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

- c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
- d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

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 10 CSR 10-6.065, §(5)(E)2.C Extension of Expired Permits
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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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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, Compliance and 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. 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)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
- a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Kyle R. Frakes, Manager Environmental, Health, and Safety. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment B

Master Equipment Lists

This is an example of the Master List to be kept by Tnemec Company, Inc, based on their current equipment list. The Master List should include the Emission Unit number used by Tnemec to identify each individual piece of equipment (i.e. EU0010), a description, and group name. This list need not contain maximum hourly design rate or emission factors; those will be in the custom tracking worksheet (see Attachment C).

Current Emission Point	Emission Unit	Description	Design Capacity	Units	New Emission Point
EP03	EU0010	Boiler #1	2.049	MM Btu/hr	EP-BL
	EU0020	Boiler #2	0.104	MM Btu/hr	
	EU0030	Boiler #3			
EP05	EU0050	AMU-1	1.9	MM Btu/hr	EP-SP
	EU0055	AMU-2	1.9	MM Btu/hr	
EP26	EU0060	HV-1	1.5	MM Btu/hr	
	EU0065	HV-2	1.5	MM Btu/hr	
	EU0070	HVAC-1	0.0924	MM Btu/hr	
	EU0075	HVAC-2	0.041	MM Btu/hr	
	EU0080	HVAC-3	0.103	MM Btu/hr	
	EU0085	HVAC-4	0.103	MM Btu/hr	
	EU0090	HVAC-5	0.103	MM Btu/hr	
	EU0095	HVAC-6	0.103	MM Btu/hr	
	EU0100	HVAC-7	0.162	MM Btu/hr	
	EU0105	HVAC-7A	0.08	MM Btu/hr	
EP24	EU0110	HV-3	1.5	MM Btu/hr	
	EU0115	HV-4	1.5	MM Btu/hr	
	EU0120	HV-5	1.5	MM Btu/hr	
EP29	EU0125	HV-6	1.5	MM Btu/hr	
	EU0130	HV-7	1.5	MM Btu/hr	
	EU0135	HV-8	1.5	MM Btu/hr	
	EU0140	HV-9	1.5	MM Btu/hr	
EP38	EU0145	HV-10	1.5	MM Btu/hr	
EP39	EU0150	HV-11	1.5	MM Btu/hr	
EP40	EU0155	HV-12	1.5	MM Btu/hr	
EP41	EU0160	HV-13	1.5	MM Btu/hr	
EP42	EU0165	HV-14	1.5	MM Btu/hr	
EP43	EU0170	HVAC-8	0.103	MM Btu/hr	
EP44	EU0175	HVAC-9	0.103	MM Btu/hr	
EP46	EU0180	HVAC-10	0.103	MM Btu/hr	
EP47	EU0185	HVAC-11	0.103	MM Btu/hr	
EP48	EU0190	HVAC-12	0.103	MM Btu/hr	

EP49	EU0195	HVAC-13	0.103	MM Btu/hr	
EP50	EU0200	HVAC-14	0.103	MM Btu/hr	
EP51	EU0205	HVAC-15	0.103	MM Btu/hr	
EP52	EU0210	HVAC-16	0.103	MM Btu/hr	
EP53	EU0215	HVAC-17	0.103	MM Btu/hr	
EP58	EU0225	HVAC-19	0.4	MM Btu/hr	
EP59	EU0230	HVAC-20	0.1	MM Btu/hr	
EP60	EU0235	HVAC-21	0.1	MM Btu/hr	
EP61	EU0240	HVAC-22	0.1	MM Btu/hr	
EP62	EU0245	HVAC-23	0.57	MM Btu/hr	
EP57	EU0220	HVAC-18	0.57	MM Btu/hr	
	EU1000	HS060	40	Gal/hr	
	EU1005	HS060	40	Gal/hr	
	EU1010	HS060	40	Gal/hr	
	EU1015	HS040	17	Gal/hr	
	EU1020	HS040	17	Gal/hr	
	EU1025	HS025	11	Gal/hr	
	EU1030	HS025	11	Gal/hr	
	EU1045	HS150	93	Gal/hr	
	EU1050	HS150	93	Gal/hr	
	EU1055	TMS25	14	Gal/hr	
	EU1060	TMS26	25	Gal/hr	
	EU1065	TMH27	12	Gal/hr	
	EU1070	TMH28	16	Gal/hr	
	EU1075	HS012	12	Gal/hr	
EP08	EU1080	HS013	12	Gal/hr	EP-ME
	EU1085	HM001	19	Gal/hr	
	EU1090	HM002	19	Gal/hr	
	EU1095	HM003	19	Gal/hr	
	EU1100	HM004	19	Gal/hr	
	EU1105	HM005	19	Gal/hr	
	EU1110	HM006	19	Gal/hr	
	EU1115	HM007	19	Gal/hr	
	EU1120	HM008	19	Gal/hr	
	EU1125	HM009	19	Gal/hr	
	EU1130	HM010	19	Gal/hr	
	EU1135	HM011	19	Gal/hr	
	EU1140	HM012	19	Gal/hr	
	EU1150	DS075	20.6	Gal/hr	
	EU1155	HS061	13.74	Gal/hr	
	EU1160	HS250	77	Gal/hr	

EU1165	DS030		12.5	Gal/hr
EU1170	DS300		70	Gal/hr
EU1175	HS075		9.7	gal/hour
EU1180			50	Gal/hr
EU1185			22	Gal/hr
EU1190			50	gal/hr
EU1195	DS150		75	Gal/hr
EU1200	HS015			
EU1205	3HP 5GL mixer	TBD		
EU1400	HS020		19	Gal/hr
EU1405	HS021		19	Gal/hr
EU1410	HS022		19	Gal/hr
EU1415	HS024		19	Gal/hr
EU1420	S2002		1	Gal/hr
EU1425	S2003		1	Gal/hr
EU1430	S2004		1	Gal/hr
EU1435	S2005		1	Gal/hr
EU1440	AM001		1	Gal/hr
EU1445	AM002		1	Gal/hr
EU1450	AM003		1	Gal/hr
EU1455	AM004		1	Gal/hr
EU1460	AM005		1	Gal/hr
EU1465	AM006		1	Gal/hr
EU1470	AM007		1	Gal/hr
EU1475	AM008		1	Gal/hr
EU1480	AM009		1	Gal/hr
EU1485	AM010		1	Gal/hr
EU1490	AM011		1	Gal/hr
EU1495	CD03			N/A
EU1500	S2006		2.5	Gal/hr
EU1505	S2007		2.5	Gal/hr
EU1510	S2008		2.5	Gal/hr
EU1900	PM001		3	Gal/hr
EU1905	PM002		10	Gal/hr
EU1910	AB001		19	Gal/hr
EU2025	SS25			
EU2030	SS32			
EU2035	SS31			
EU2040	SS30			
EU2045	SS28			
EU2050	SS29			
EU2055	SS35			

EU2060	SS34		
EU2065	SS27		
EU2070	SS26		
EU2075			
EU2080	PT34		
EU2085	PT35		
EU2090	SS33		
EU2095	PT36		
EU2100	PT37		
EU2105	SS35		
EU2560	ST47		
EU2575	ST68		
EU2580	ST55		
EU2585	ST56		
EU2590	ST57		
EU3000	BM006	15	Gal/hr
EU3100	BM001	3	Gal/hr
EU3105	BM002	3	Gal/hr
EU3110	BM003	25	Gal/hr
EU3115	BM005		
EU3120	BM008	1	gal
EU3125	BM007		
EU3130	BM004		
EU4000	RW001		N/A
EU4005	RW002		N/A
EU4010	RW003		N/A
EU4015	SS001	90	Gal/hr
EU4020	SS002	186	Gal/hr
EU4025	SS003	186	Gal/hr
EU4030	SS004	41	Gal/hr
EU4035	SS005	52	Gal/hr
EU4040	SS006	52	Gal/hr
EU4045	SS007	94	Gal/hr
EU4050	SS008	94	Gal/hr
EU4055	SS009	63	Gal/hr
EU4060	SS010	32	Gal/hr
EU4065	NA		
EU4070	SSM57		
EU4075	SSM58		
EU4080	SSM59		
EU5000		150	Gal/hr
EU5005	NPK05	625	Gal/hr

	EU5010	HFT001	80	Gal/hr	
	EU5015	NPK01	2400	Gal/hr	
	EU5100	PDP01	20	Gal/hr	
	EU5105	PDP02	20	Gal/hr	
	EU5110	FT01	200	Gal/hr	
	EU5115	FT02	200	Gal/hr	
	EU5120	FT03	200	Gal/hr	
	EU5125	FT04	200	Gal/hr	
	EU5130	FT05	200	Gal/hr	
	EU5135	FT06	200	Gal/hr	
	EU5140	FT07	200	Gal/hr	
	EU5145	FT08	200	Gal/hr	
	EU5150	FT09	200	Gal/hr	
	EU5155	FT10	200	Gal/hr	
	EU5160	FT11	200	Gal/hr	
	EU5165	IPK01	12	container/second	
	EU5170	IPK02	12	container/second	
	EU5200	PVS1	200	Gal/hr	
	EU5205	PVS2	200	Gal/hr	
	EU5210	PVS3	200	Gal/hr	
	EU5215	PVS4	200	Gal/hr	
	EU5220	PVS5	200	Gal/hr	
	EU5225	PVS6	200	Gal/hr	
	EU5230	PVS7	200	Gal/hr	
	EU6000	NA			
	EU6005	CC01			
	EU7000	SR01	850	Gal/hr	
	EU7005	SR01			
	EU7010	SR01			
	EU7015	NA			
	EU8015	BC01		Tons/hr	
	EU8020	HSD5	0.375	Gal/hr	
EP55	EU1700	AGM02	1.5	Tons/hr	EP-AG
	EU1710	AGM02	1.5	Tons/hr	
	EU1715	AGM02	1.5	Tons/hr	
	EU1720	AGM02	1.5	Tons/hr	
	EU1725	AGM02	1.5	Tons/hr	
	EU1730	AGM02	1.5	Tons/hr	
EP01	EU2000	ST36			EP-ST
	EU2005	ST37			
	EU2010	ST38			
	EU2015	ST39			

	EU2020	ST40		
	EU2500	ST41		
	EU2505	ST42		
	EU2510	ST43		
EP07	EU2515	ST44		
	EU2520	ST45		
	EU2525	ST48		
	EU2530	ST50		
	EU2535	ST51		
	EU2540	ST46		
EP06	EU2545	ST49		
	EU2550	ST52		
	EU2555	ST53		
EP56	EU2570	ST54		
EPVE	EU7100	VE001		EP-VE
EP20	EU8000	SB01		
EP21	EU8005	SB02		
EP31	EU8010	SB03		
EP45	EU8025	SB04		EP-SB
EP45	EU8030	SB05		
EP63	EU8035	SB06		
		Kohler 60 kW generator		EP-EG

Attachment C
Custom Tracking Worksheets

Plantwide PW 1 emission limit:

- Permit Condition PW 1 of this operating permit limits the emissions of volatile organic compounds (VOCs) emitted by this installation to less than 100 tons of VOCs and less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of combined HAPs in any rolling 12-month period. When calculating the total emissions, be sure to include emissions from all emissions source groups at this installation, listed on page 3 of this operating permit. Emission units are grouped by type: boilers, air make-up units, space heaters, mixing equipment, aggregate mixing & handling, storage tanks, vapor extraction, spray booths, and emergency generators. Boilers and space heaters may be combined and tracked by natural gas usage.
- Record at a minimum the following information:
 - The monthly production in tons for all mixing equipment (EP-ME); use stack test emission factor of 16.00 lbs/ton for VOC and HAP emissions (SDS values are also acceptable).
 - The coating usage for EP-SB; use VOC emission factor of 3.5 lbs/gal (highest of all components) and HAP emission factors derived from SDS (3.5 lb/gal also acceptable).
 - The fuel consumption in MMSCF for boilers, air make-up units / space heaters, and emergency generators (EP-BL, -SP, and -EG); use WebFIRE emission factor for boilers (5.5 lbs/MMSCF SCC 10200603) and make-up/space heaters (5.3 lbs/MMSCF SCC 10500106).
 - VOC and HAP emissions from vapor extraction system (EP-VE); emission factors from stack tests required by Permit Condition 4 (see below).
- Calculate monthly VOC, individual HAP, and combined HAP emissions by multiplying throughput and emission factor for each type.
- Calculate rolling 12-month VOC emissions by adding current month's emissions to previous eleven months emissions.
- Compare emission total to limit and indicate whether or not compliance was met.
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with IO CSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions*.

Permit Condition 4 emission limits:

- Per Special Condition 2 of construction permit 062009-008B, incorporated in this operating permit as Permit Condition 4, track and record the emissions of VOC, individual HAP, and combined HAPs from vapor extraction system (EP-VE) to ensure that the emissions of VOCs will not exceed 40 tons of VOC. (note – the plantwide HAP emission limit above is more restrictive than the PC 4 limit, so it has not been repeated here.)
- Record the monthly VOC and HAP emissions by EP-VE:
 - The hours of operation for EP-VE.
 - The stack test flow rate in cubic feet per hour.
 - The calculated emissions factors from stack test in pounds per hour (lb/hr).
- Calculate monthly VOC, individual HAP, and combined HAP emissions by multiplying the hours of operation each month by the emission factors.
- Calculate rolling 12-month emissions of VOCs by adding current month's emissions to previous eleven months emissions.

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.

INSTALLATION DESCRIPTION

Tnemec Company, Inc. manufactures specialty high performance paints and coatings in North Kansas City, Missouri. Batch process operations include raw material storage and conveying, milling, wetting in of dry raw materials, product mixing, product tinting and product packaging. Solvent is used to clean most production equipment and the installation operates a still to recover and reuse the cleaning solvents. The spray booths are used for product testing. The installation has limited volatile organic compound and hazardous air pollutant emissions to remain below the major source level. It is not a named source and fugitive emissions are not counted towards potential-to-emit.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹	HAP	Potential to Emit (tons/yr) ¹
CO	3.18	ethylbenzene	29.28
NO _x	13.10	xylene	64.49
PM ₁₀	4.95	methyl isobutyl ketone	57.85
PM _{2.5}	0.98	total HAP	151.91
SO _x	0.08		
VOC	206.06		

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
CO	0.00	0.00	0.00	0.00	0.00
NO _x	0.00	0.00	0.00	0.00	0.00
PM ₁₀	0.01	0.01	0.01	0.01	0.01
PM _{2.5}	0.01	0.01	0.01	0.01	0.01
SO _x	0.00	0.00	0.00	0.00	0.00
VOC	13.08	14.08	14.08	14.45	14.45
HAP	5.74	6.18	6.18	6.34	6.34

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received January 22, 2015;
- 2) 2016 Emissions Inventory Questionnaire, received March 29, 2017;
- 3) Construction Permit #0899-008, Issued May 20, 1999;
- 4) Construction Permit #0899-008a, Issued March 13, 2001;
- 5) Construction Permit #012000-003, Issued December 15, 1999;
- 6) Construction Permit #092001-001, Issued July 27, 2001;
- 7) Construction Permit 062002-014, Issued June 11, 2002;
- 8) Construction Permit #012008-003, Issued January 7, 2008;
- 9) Construction Permit Amendment #062009-008A, Issued October 28, 2009;
- 10) WebFIRE, and
- 11) U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

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 10-2.215, *Control of Emissions from Solvent Cleanup Operations* – this rule is not applicable because VOC emissions from cleaning activities do not exceed 500 pounds per day.

10 CSR 10-2.300, *Control of Emissions From the Manufacturing of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products* – this rule is not applicable because PW 1 limits VOC emissions to less than 100 tons per year.

10 CSR 10-6.100, *Alternate Emission Limits* – this rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* – does not apply because visible emissions monitoring from PW 2 is more restrictive (10% vs 20%).

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* – applies but is considered in compliance because only natural gas is combusted [10 CSR 10-6.405(1)(C)].

Construction Permit History

- 1) Construction Permit 0385-001A, Issued February 26, 1985. This construction permit was superseded by Construction Permit 0390-003. Therefore, no permit conditions were included in the operating permit for this construction permit.
- 2) Construction Permit 0390-003, Issued March 7, 1990. This equipment has been removed from service and disconnected. A new construction permit would be required to reactivate it. Therefore, no permit conditions were included in the operating permit for this construction permit.
- 3) Construction Permit 0899-008, Issued May 20, 1999 and Construction Permit #0899-008a, Issued March 13, 2001. These construction permits limit the emissions from equipment installed without a construction permit during the period between 1986 and 1997. They have not been included in this document because other permit conditions are more restrictive.
- 4) Construction Permit 062002-014, Issued June 11, 2002. This permit was issued for the installation of storage tanks.
- 5) Construction Permit 102008-003, issued January 7, 2008. This permit was issued for installation of a new paint mixer and included 100 tpy VOC and 10/25 HAP limits. Because of the constant addition of small equipment, a potential-to-emit problem arose (see Section I Installation Equipment Listing). The limits were superseded by an amendment and then by this document.
- 6) Construction Permit 062009-008A, Issued October 29, 2009. This amendment was superseded by a following amendment, 062009-008B, which was issued on July 29, 2010 (see PC 5).

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*; 40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*; 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* These rules were determined not to be applicable any of the three boilers because the rated heat capacity of each boiler is less than 10 MM Btu/hr.

40 CFR Part 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984* These rules were determined not to be applicable any of the tanks because each tank has capacity less than 75m³.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart HHHHH, *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing* This rule was determined not to be applicable to the installation because the installation is a synthetic minor source of HAPs.

40 CFR Part 63 Subpart CCCCCC, *National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing* The installation currently handles several pigments and solids which are subject to the rule. The installation does not handle any materials which contain benzene or methylene chloride. Plantwide permit condition PW 2 has been included in this permit to provide compliance requirements for emission units determined to be subject to the rule. The permittee is expected to determine whether or not there are emission units subject to the rule on an ongoing basis. Those units would then be subject to PW 2.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin – the facility has no obvious sources of particulate emissions, therefore the monitoring and recordkeeping parts of the Core Permit Condition were removed.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes* – the installation has three groups potentially subject to this rule: mixing equipment (EP-ME), aggregate handling (EP-AG), and spray booths (EP-SB).

All mixing equipment (EP-ME) is exempt under 10 CSR 10-6.400(1) (B)(12) because they have PTE less than 0.5 lb/hr at maximum capacity, as demonstrated in the following table:

Emission Unit	MHDR (per hour)	Emission Factor (lbs/ton)	Pre-Control PTE (lbs/hr)
EP-03	1.007	0.13	0.13

All aggregate handling units (EP-AG) are exempt under 10 CSR 10-6.400(1)(B)(15). These emission units are required to control emissions by enclosing all transfer points and using the cartridge filter whenever these units are operated by Permit Condition 3, which requires the filter to have a control efficiency of at least 90%. The manufacturer’s specifications indicate a 99% control efficiency. Therefore, this rule was determined not to be applicable to these units.

All spray booths (EP-SB) are exempt under (B)(8); all spray booths are used only intermittently for research into new paint formulas, which qualify them as laboratory equipment under 10 CSR 10-6.061(3)(L) – physical and chemical experimentation.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

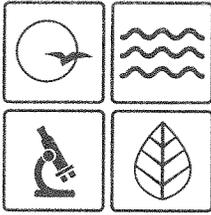
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

No comments were received.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

AUG 13 2018

Mr. Kyle R. Frakes
Tnemec Company, Inc.
123 West 23rd Avenue
North Kansas City, MO 64116

Re: Tnemec Company, Inc., 047-0075
Permit Number: OP2018-052

Dear Mr. Frakes:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:bjj

Enclosures

c: PAMS File: 2015-01-041

